Data Protection Impact Assessment

Sisra Analytics

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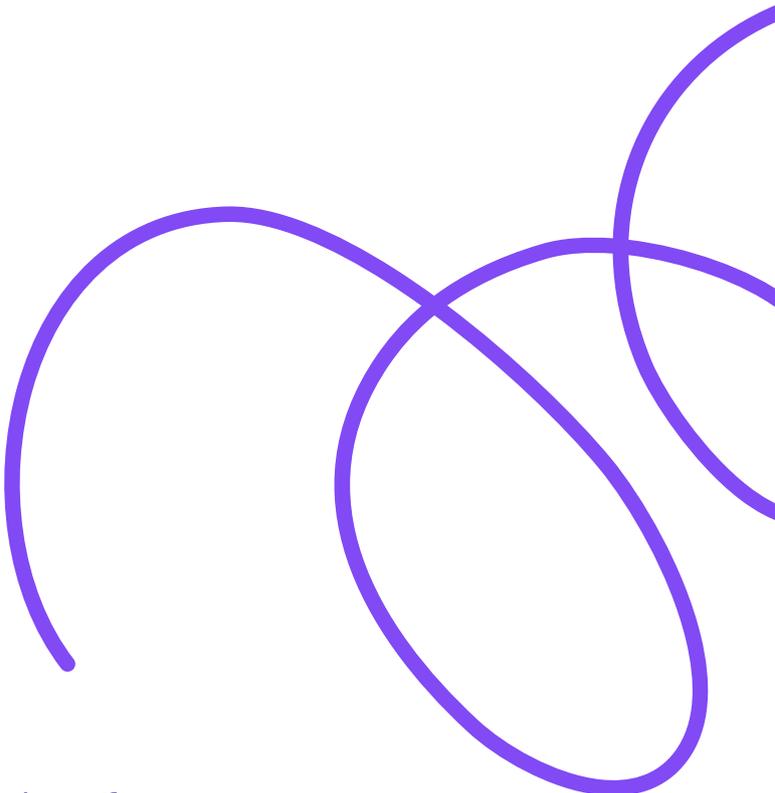
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Data Protection Impact Assessment (DPIA)

How to complete a DPIA

A DPIA must be carried out if new technology is being deployed or there is a change to the nature, scope, context or purposes of existing processing activities which meets any of the criteria below.

There are guidance notes in Appendix A to assist you in completing the form.

Screening

The DPIA comes in two parts: the first part is a short screening questionnaire, which requires you to answer a set of questions to establish whether certain data processing operations, activities or processes will impact upon the rights and freedoms of data subjects.

Full DPIA Assessment

Where you have answered yes to one or more of the screening questions in Part 1, you must complete Part 2 to document the assessment of the impact of the processing activities.

Part 1

DPIA Screening

Describe the project/processing/system etc. and, if it is new or a variation to existing, explain why it is being introduced. Include the objectives of the processing.

Sisra Analytics is a Juniper product. It makes the complex task of analysing pupil progress and attainment data a lot simpler. Analysis is done for you. We keep up to date with DfE changes so you don't have to worry about updating formulae and navigating complex spreadsheets.
Sisra Analytics puts the data in the hands of school staff, from class teacher to Governor, providing them with the information and insight they need to make informed decisions surrounding support, intervention and facilitate improvement. Spend more time working with students, rather than analysing data.

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DPIA Screening Questions

Complete this section to help determine whether the processing is likely to result in a risk to the rights and freedoms of data subjects. Use the guidance in Appendix A to assist you. Where the answer is yes/true, indicate this in the relevant checkbox.

You should **consider** carrying out a DPIA if you plan to carry out any of the following:
- ☐ A major project involving the use of personal data;
- ☐ Deploy new software/application/technology;
- ☐ Evaluation or scoring;
- ☐ Systematic monitoring;
- ☒ Processing sensitive data or data of a highly personal nature;
- ☒ Large scale processing activities;

You **must always** carry out a DPIA if you plan to:
- ☐ Process special-category data or criminal-offence data on a large scale;
- ☐ Process personal data that could result in a risk of physical harm in the event of a security breach;
- ☐ Process personal data concerning vulnerable data subjects;
- ☒ Process children's personal data for profiling or automated decision-making or for marketing purposes, or to offer online services directly to them;
- ☐ Process biometric or genetic data;
- ☐ Systematically monitor a publicly accessible place on a large scale;
- ☐ Process personal data without providing a privacy notice directly to those affected;
- ☐ Process personal data in a way that involves tracking individuals' online or offline location or behaviour;
- ☐ Use systematic and extensive profiling or automated decision-making or special category data to make significant decisions about people including decisions on someone's access to a service, opportunity or benefit;
- ☒ Combine, compare or match data from multiple sources;
- ☒ Use innovative technology or technology in innovative ways;
- ☐ Processing that involves preventing data subjects from exercising a right or using a service or contract.

If **any** of the boxes above are ticked, a DPIA **must** be carried out. Complete and sign below then complete Part 2 of this form.

If none of the boxes above are ticked a DPIA is not required. Complete and sign below then forward this form to the DPO@junipereducation.org

*Delete one option

Part 2

About the Processing

What data is being processed?

Tick all that apply

- ☒ Name
- ☒ Other identifiers e.g. ID, username, etc.
- ☐ Financial information
- ☐ Religious Beliefs, Trades Union Membership or Political Opinions
- ☐ Medical/Health information or information about disabilities
- ☐ Criminal offences/convictions
- ☐ Information about behaviour
- ☐ Audio or video recordings (e.g. CCTV images) or photographs
- ☐ Location data
- ☐ Biometric or genetic information
- ☒ Profiling
- ☐ Other (please state below):

Who is the data about?

Tick all that apply

- ☐ Employees, former employees, or prospective employees incl. volunteers etc.
- ☒ Customers, former customers, or prospective customers
- ☐ Suppliers, former suppliers or prospective suppliers
- ☒ Members of the public

Describe the people whose data is being processed below. Include a description of the nature of the organisation's relationship with data subjects and whether the processing might include children or other vulnerable groups.

School/MAT staff and students (including children).

Would the people whose data is being processed expect their personal data to be used in the ways envisaged? Include a justification if it is within their reasonable expectations.

Yes, the processing is in line with the provision of contracted services and would be expected as part of the monitoring of student progress and attainment.

Purpose of the processing

What are the aims of the processing? What does the organisation want to achieve from it? If the data is pre-existing, how will the new use/processing differ from the current use/processing?

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Responsibility/Beneficiaries

Who in our organisation is taking responsibility for the processing? Who stands to benefit from the processing and how? What are the intended effects on individuals? How will they benefit?

The Product team, Development team and DevOps team are responsible for the processing.

The processing benefits schools and school staff in allowing them to analyse the performance of their students.

Nature and context of the processing

Describe the processing activities and their purpose. Provide sufficient context to enable the reader to understand how and why the processing occurs. Include information about how data will be collected, used and stored; the scale size and frequency of processing as well as who will use the information and for what purpose(s). If the processing is novel in any way, please describe how.

Importing student information from MIS. Information will relate to student classes, name, year group and any information such as Pupil premium, SEND, Free school meals etc.

Importing student assessment data at regular intervals.

Uploading KS4 and KS5 exam results

Ability to import Attitude to Learning data

IT Systems

What IT systems including hardware and software will be used for the processing?
Include data flows where possible that explain and visualise the processing activities and flow of data.

Microsoft Azure
Database and web servers

Disclosure and Sharing

Will the data be shared with any other people/organisations such as government agencies, data processors or sub-processors e.g. third party suppliers, application/website hosting companies, etc?   ☒Yes ☐No
If yes, please list them below and include the purposes of the processing, their country and a link to their privacy notice.

Name	Purpose of processing	Country	Privacy Notice Link
Microsoft Azure	Hosting	UK	

Consultation Process

The purpose of a consultation process is to understand the concerns and expectations of the individuals, test appropriate solutions and improve transparency.

Will the organisation be seeking the views of staff/customers/residents/other stakeholders regarding this processing? If not, why is this not necessary? If yes, describe the consultation process.

> User groups will be created to discuss development and feedback with customers.
>
> Stakeholders across the company and occasionally user groups and working groups.

Who else within the organisation will be consulted to ensure that all risks from the envisaged data processing are understood and properly mitigated?

> Cross collaboration of teams – Product, Development, DevOps and DPO.

Assessing the processing's necessity and proportionality

Are there alternative solutions which meet the goals without creating the same data processing risks? For example, a high-risk data processing activity which carries minimal benefit for individuals or significantly affects their data protection rights may not be proportionate. Further, if there is a feasible alternative which is of lower risk (e.g. one that makes less use of personal data), such activity may also not be necessary.
☐Yes   ☒No

If there are no alternative solutions, consider whether the data processing complies with the data protection principles.

Rights

Where Juniper is the Data Controller, they are responsible for all data subjects' rights request. Where Juniper is processing customer data e.g. to provide software or services, they are the Data Processor.

Who is responsible for responding to data subjects' rights requests?

> Juniper Customer

Privacy Information

Does the Juniper Privacy notice provide sufficient information about how the data will be obtained and processed? If not, please contact DPO@junipereducation.org to have it added.
☒Yes   ☐No

Lawful Basis

What is the lawful basis for processing the data? Tick all that apply

☐ Consent	☐ Vital interests	☐ Task by a public authority
☒ Performance of a contract	☐ Legal obligation	☐ Legitimate Interests

Is special category data processed? Special category data reveals racial or ethnic origin; political opinions; religious or philosophical beliefs; trade union membership; genetic data; biometric data (where used for identification purposes); health; sex life; and sexual orientation.

☐Yes   ☒No

If yes, what is the lawful basis for processing the special category data?

☐ Explicit consent	☐ Social security/protection law	☐ Legal defence or claim
☐ Employment law	☐ Vital interests	☐ Substantial public interest
☐ Public health interests	☐ Preventative/occupational medicine	☐ Archiving in public interest
☐ Data manifestly made public by data subject	☐ Scientific/historical research or statistical purposes	

Purpose Limitation and Minimisation

What measures have been taken to ensure that any personal data collected or created in this processing is not used for any purpose other than that documented in this DPIA?

> If the data is to be used for any other purpose, for example, the Sisra Data Collaboration, schools are informed of this and the system administrator must opt-in to agree to their school grades contributing to the exercise. Only the raw data is collected.

What measures have been taken to ensure that only adequate and relevant information is used in the processing and that it is limited to only that which is necessary to achieve the processing aims?

> Minimum mandatory fields. Data uploads controlled by customer.

Accuracy

What measures have been taken to ensure that personal data is accurate? Is there a requirement to keep any personal data up-to-date? Could there be any negative consequences if the personal data is not kept up-to-date?

> Customers upload data into Analytics that has been recorded elsewhere, therefore, it is the responsibility of the customer to ensure that all data is kept up-to date.

Storage Limitation (Retention)

What is the retention period for the various types of personal data? If you cannot specify a specific retention period, what are the criteria that determine if the information is no longer needed, e.g. fulfilment of contract? How will the information be treated, e.g. returned/destroyed when it reaches the end of its retention period?

> Once a school has cancelled, we delete their information from the database 90 days after the cancellation date.
>
> Juniper retains current customer data for 8 years.

Security

Describe the security measures that will be implemented to ensure the confidentiality, integrity, availability and restorability of the data, data systems and processes?

Passwords encrypted
SSL certificates

Internal access directly to servers is restricted using VPN with Azure AD RBAC policy. Log-in is secured behind Active Directory under a least privilege schema. Backups of data occur daily.

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Client: Name Here

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