

# Data Protection Impact Assessment



Education HR Services

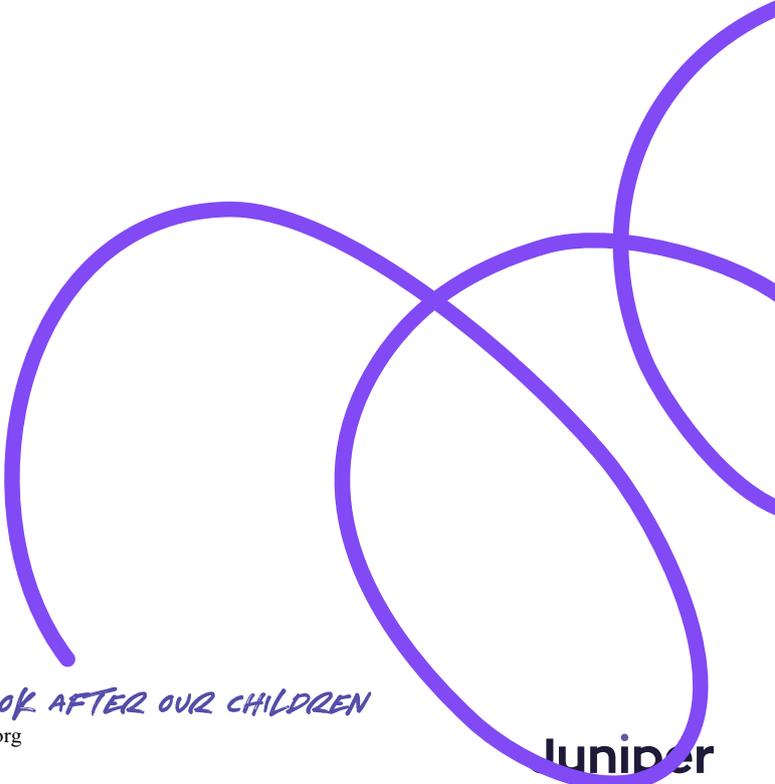
Date: 22/5/2025



Juniper

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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.

Juniper Education HR provides a range of services to customer schools and Academy Trusts including Advice Line, Consultancy, Investigations, Mediation and Audits.

Data is processed for the performance of this service contract including:

- Providing practical advice and guidance on how to manage HR issues in line with best practice and legal requirements
- Assessing and making recommendations in relation to compliance
- Carrying out investigation on a commissioned basis

## 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 innovate 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](mailto:DPO@junipereducation.org)

Date of DPIA Screening	22/5/2025
Result of DPIA Screening	Full DPIA required

\*Delete one option

## Part 2

### About the Processing

#### What data is being processed?

Tick all that apply

- Name and titles/job titles
- Other identifiers e.g. ID, username, etc.
- Personal address/postcode
- Business address/postcode
- Personal contact details, phone, email, etc.
- Business contact details, phone, email, etc.
- Bank details/financial information
- Employment details including salaries and benefits
- Absence data
- Performance data
- Next of kin
- Special Category data (race, religion, trade unions, health, disability, political opinion, sexual orientation, biometrics etc.)
- Criminal offences/convictions
- Information about behaviour
- Audio or video recordings (e.g. CCTV images) or photographs
- Location or ip data
- 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

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~~organisation's relationship~~ with data subjects and whether the processing might include children or other vulnerable groups.

Data subjects consist of:

- Current staff of our customer schools (teaching, administrative, support).
- Past staff of our customer schools
- All data subjects are over 18.
- There is no processing of children's or pupil data other than on an anonymous basis e.g. "pupil A".
- Special Category data relates only to health/disability, criminal matters (or union membership provided recorded voluntarily).

The relationship is contractual for delivery of a service contract (employees/schools).

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.

Employees reasonably expect Juniper and their employer to process HR data in order to fulfil their employment contract. All data categories and third-party sharing are disclosed in the staff privacy notice and contract terms provided by their employer. No unexpected uses (e.g. marketing) are envisaged.

## 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?

To meet the requirements of the contracted services and improve HR functions within customer schools and Academy Trusts including Advice Line, Consultancy, Investigations, Mediation and Audits.

## 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?

HR leadership and staff  
Processing is essential for the performance of the contract  
Managers benefit from oversight and reporting tools.

## 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.

Processing activities include:

- ~~Recording of phone calls~~ and retained records of emails on Zen – this rarely involves the recording of personal details related to named individuals
  - Case work records - electronic files and Case Log on Sugar – this includes e.g. Disciplinary, grievance, sickness records of customers current employees and ex-employees to enable us to undertake our HR consultancy service.
  - When customers call or email the HR consultancy service we will record their ER cases, this enables us to undertake our roles efficiently and effectively.
- The purpose is to:
- Enable HR to have one place to store customer case work records e.g. records of ER case work, meetings, calls, advice given.
  - Enable Juniper SLT/management and HR staff to log, review and analyse case log with ease and accuracy to support the HR consultancy function.
  - The Juniper HR Consultants main role and purpose is to support customers with case work on a daily basis.

## 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.

**SugarCRM** (hosted on AWS UK region, AES-256 at-rest encryption, daily backups);  
**Microsoft Outlook** (Exchange Online via Juniper’s tenant, TLS in transit).  
 Data flows: emails and calendar items sync via Sugar Connect; all case-log entries are saved directly into SugarCRM.  
**Zendesk** – calls and emails recorded  
**Shared OneDrive folders**- case files

## 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
SugarCRM Inc.	Provision of CRM platform	UK	<a href="#">Privacy Policy   SugarCRM</a>
Sugar Connect	Integration between CRM platform and Outlook to enable email and meetings to be easily recorded in CRM.	EU	<a href="#">Privacy Policy   SugarCRM</a>
Amazon Web Services Inc.	Cloud infrastructure for SugarCloud Service	UK	<a href="#">AWS Privacy (amazon.com)</a>
Microsoft O365	Emails and file management	UK	<a href="#">Data Privacy in the Trusted Cloud   Microsoft Azure</a>

## Consultation Process

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

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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.

Processing of data is an established, industry-standard that does not introduce novel functionality or alter employee entitlements. No new data categories are introduced and no automated decision-making with legal effect is being implemented.

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

The Data Protection Officer, IT Manager, Information Security Officer and HR Team will be consulted. No further stakeholder consultation will be conducted.

## 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?

The customer organisation is the Data Controller and handles all rights requests. Juniper acts as Data Processor and will respond only on the Controller's instructions.

## 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](mailto:DPO@junipereducation.org) to have it added.

Yes  No

## Lawful Basis

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

<input type="checkbox"/> Consent	<input type="checkbox"/> Vital interests	<input type="checkbox"/> Task by a public authority
<input checked="" type="checkbox"/> Performance of a contract	<input checked="" type="checkbox"/> Legal obligation	<input type="checkbox"/> 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?

<input type="checkbox"/> Explicit consent	<input type="checkbox"/> Social security/protection law	<input checked="" type="checkbox"/> Legal defence or claim
<input checked="" type="checkbox"/> Employment law	<input type="checkbox"/> Vital interests	<input type="checkbox"/> Substantial public interest
<input type="checkbox"/> Public health interests	<input type="checkbox"/> Preventative/occupational medicine	<input type="checkbox"/> Archiving in public interest
<input type="checkbox"/> Data manifestly made public by data subject	<input type="checkbox"/> 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?

Security settings have been set to ensure only HR education staff have access to case files. See DPIA for Sugar Case Log

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?

Only relevant data is collected as is necessary for the performance of the contract. Data is retained in accordance with Juniper's data retention policies and schedules. Recording system records only necessary data (see Case Log DPIA).

## 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?

Data is mainly stored in real time, reviewed and updated regularly and input directly from HR staff with the information customers provide us alongside our own records of data. Data will be spot checked at intervals by Managers/SLT.

## 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?

Records will be retained in SugarCRM in accordance with Juniper's HR retention policy:

- Active casework: retained until case closure.
- Closed cases: retained for 6 years post-closure, then permanently deleted via SugarCRM's data purge schedule and HR staff for case files.

## Security

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

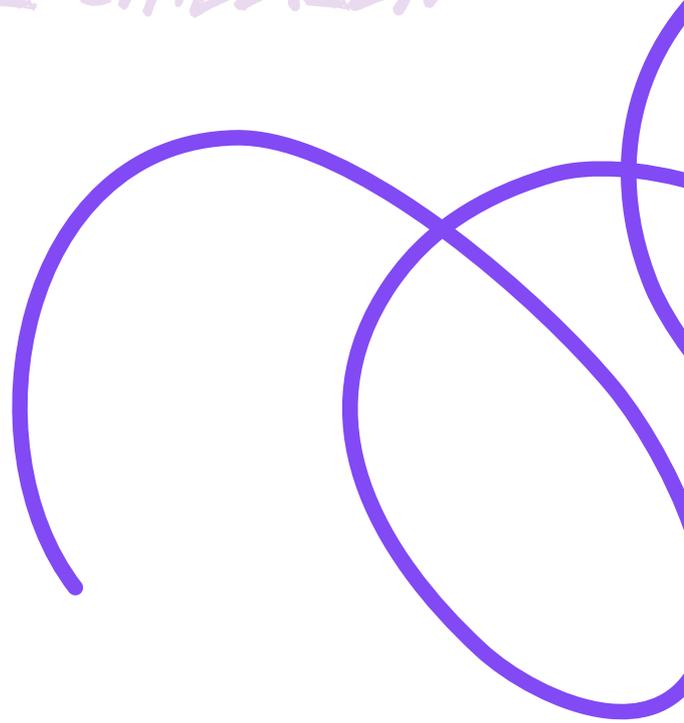
File access is restricted to HR staff.  
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**Client:**



# Juniper

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