

Data Protection Impact Assessment



Managed Services – Payroll & Pensions Bureau

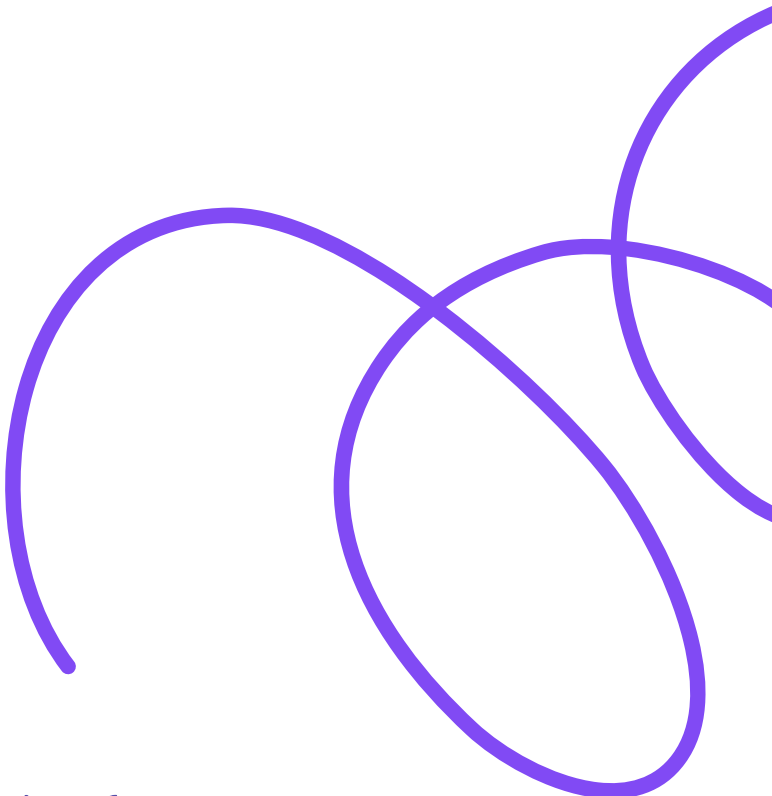
Date: 24/11/2025



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.

Catalyst/Kanban

This is our payroll system that is used to produce the monthly payroll. We process contract and payroll information here.

Zendesk

This is a secure portal for clients to contact us, this is where clients can submit payroll information and payroll changes, ask questions or raise queries relating to their monthly payroll processing.

Online Portal

This is a portal to the Catalyst system where clients can make their own payroll changes view employee records and view their monthly reports.

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

Date of DPIA Screening	24/11/2024
Result of DPIA Screening	Full DPIA required / Full DPIA not required*

*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 – addresses and work locations
- 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.

We are responsible for processing data relating to clients, their employees and third parties (such as HMRC, Unions, Pension Providers and DWP).

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, to process their salary and related activities.

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?

For employees'/clients the aim of processing this data is to ensure that their monthly salaries are processed each month ahead of their regular pay dates.

For third parties the aim of providing data is to confirm that contributions taken from the employees' salaries are reported and paid over dependant on the deduction made.

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?

We have a Payroll and Pension team responsible for the processing of payroll that is overseen by two Payroll Managers, one Pension Manager, one Payroll Operations Manager and one Payroll Director.

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.

The processing undertaken is to fulfil the requirements of a contract between Juniper (data processor) and a customer (data controller).

All data is provided by or through the customer then processed by Juniper using secure platforms (see below: IT Systems).

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.

Payroll Processing: Kanban (Internal), Catalyst (Internal), Zendesk Secure Portal (Internal), Microsoft Outlook (Internal), Microsoft Excel (Internal), Microsoft SharePoint (Internal).

Pensions: LPPA Portals (External), Teachers Pension Portal (External), NEST Portal(External), Standard Life Portal (External), Local Authority Portals (External)

Payments (inclusive of third-party payments): BACS Active (Internal), Microsoft Excel (Internal).

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.

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Name	Purpose of processing	Country	Privacy Notice Link
Teachers Pension	Contribution details	UK	Privacy Teachers' Pensions
Local Government Pension Providers	Contribution details	UK	Refer to relevant local authority websites.
DWP	Court Orders, Attachment of Earning Orders, Child Maintenance Orders etc.	UK	Personal information charter - Department for Work and Pensions - GOV.UK
HMRC	FPS and EPS submissions as per payroll legislations	UK	HMRC Privacy Notice - GOV.UK
BACS Active	Processing BACS payments	UK	Privacy Policy Finastra
Unions	Contribution details	UK	Privacy policy - UNISON National Legal & Privacy GMB Union Refer to other relevant Trade Union websites.
Clerical Medical	Contribution details	UK	Privacy Notice Legal Clerical Medical
London Mutual Credit Union	Contribution details	Uk	Privacy policy London Mutual Credit Union
Crown Savers	Contribution details	UK	Lewisham + Bromley Credit Union

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.

We seek the views of our customers to streamline the processes involved in processing their salary payments each month.

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

*Data Protection Officer
Infrastructure Team
Chief Executive Officer (where applicable)
Chief Financial Officer (where applicable)*

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

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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?

Data subject' rights requests are directed to and handled by the controller (customer).

As a data processor, Juniper will assist the controller where required to fulfil requests.

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

<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?

We safeguard the information by ensuring that all payroll information is submitted to us via a secure portal only which is access controlled. Secure login credentials can only be obtained once request forms have been completed and signed by the client.

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?

We have contract change templates with specific fields that need to be filled in dependant on what is being processed, we do this to ensure we collect the right information required but also to ensure we are not given information that we do not need.

The Catalyst system only requires relevant information to complete the task.

We process the bare minimum data require for the purpose of fulfilling the payroll/pension requirements.

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?

Clients can update information like bank details/contact details directly via the secure Catalyst portal.

Clients can also provide us with any updated information via the secure Zendesk portal, such as personal details, bank details, salary/contract details etc.

We have a requirement for email addresses to be kept up to date to ensure employees can receive their monthly payslips.

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?

We hold the information for the duration of the contract after of which it is returned to customer and/or deleted.

We align with the specific retention periods for the relevant authorities.

Security

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

We have a secure portal (Zendesk) which we control access for to receive information for payroll processing. Secure login credentials can only be obtained once request forms have been completed and signed by the client.

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~~We also have secure Catalyst portal access which we control access to for clients to access their Catalyst portal to update personal details, input temporary data and access reports. Secure login credentials can only be obtained once request forms have been completed and signed by the client.~~

Confidentiality – Access to all servers that hold data are limited to those that work directly with the school and product.

Integrity – The inputting of data is limited to the school through the secure portal and the payroll administration team who access this data. All servers are backed up so should data be compromised; we are able to access the last back up which will contain the correct information.

Availability – We safeguard the information by ensuring payroll information is only submitted to us via a secure portal which is access controlled. Secure login credentials can only be obtained once request forms have been completed and signed by the client



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