



# Data Protection Impact Assessment

Juniper MIS / Pupil Asset

Date: 04/06/24



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 MIS is cloud-based MIS system, designed for school and MATs, intended to be the product evolution for existing Pupil Asset/Horizon customers. It is a records management system that a school or MAT can use to store information about Staff, Pupils and Parent/Carers and the School.

It is a brand new product, that Juniper will look to move customers from our existing MIS offering onto.

Juniper MIS sits at the heart of the new Juniper operating system proposition, allowing for better decentralised and more specific functionality for our customers.

As part of this migration – new ETL tooling has also been created to move data seamlessly between Pupil Asset/Horizons and Juniper MIS.

## 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:

- This a major project involving the use of personal data;
- 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	04/06/24
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
- 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.

Juniper MIS holds information who has any relation to a school or MAT, this includes subjects professionally linked with the school. The processing will definitely include pupils and vulnerable groups data.

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.

The subjects would expect this, it is common.

### 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?

The processing allows users to effectively record data and run processes from it. This allows the users to ensure that their policies are met in a satisfactory fashion.

## 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?

Juniper will benefit commercially and in relation to product development through feedback. The user will benefit from the processing as it will allow them to execute their policies effectively. By running these processes, they can ensure a safe environment for children and a positive learning environment. Subjects will benefit from the application of these policies.

## 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.

Subjects will have their data collected and organised into relevant data storage. This will encompass everything that allows the user to work with the subject, such as identity and contact details, medical data, assessment, behaviour and attendance data. This data is collected via a local authority, the user themselves or a combination of both.

Data is stored in secure cloud storage services. Processing occurs on a real time or scheduled basis. Data that is processed will then be available in the system to view so that users can make any interventions required.

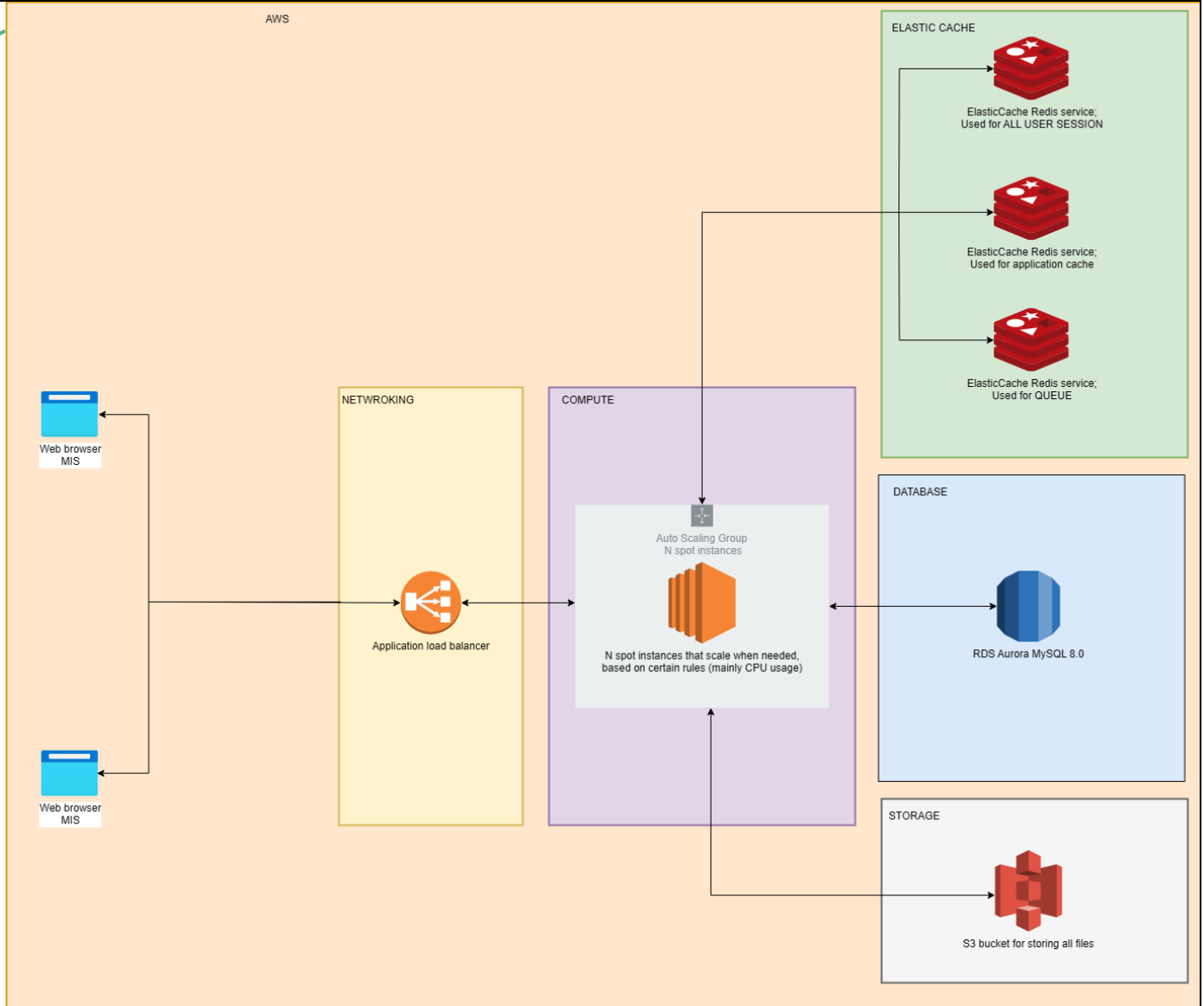
Data will be processed in conjunction with machine learning services in order to highlight trends or suggest interventions that may benefit the effective teaching to the subject or reduce barriers to learning.

## 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.

Juniper MIS and Pupil Asset is based on the AWS cloud computing stack. The structures and related products are outlined below.

# Juniper Data Protection Impact Assessment



## MIS

The MIS is hosted within AWS and can be split into the following structures:

Networking - Amazon Elastic Load Balancing

Compute - Amazon EC2 Spot Instances

Cache - ElastiCache Redis

Database - RDS Aurora

Storage - S3

## ETL Tooling

The ETL tooling is hosted within AWS. It takes data from an input source and outputs it to Juniper MIS. This process uses the following systems:

Database - MySQL

Web Server - Apache

Files - S3 / NFS

## Pupil Asset

The Pupil Asset is hosted within AWS and can be split into the following structures:

Networking - Application load balancer

Compute - EKS

Cache - ElastiCache Redis

Database - AWS RDS

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~~Storage S3 and encrypted network file storage~~

## 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
DfE	Statutory	UK	<a href="#">Link</a>
Wonde	Data Share, Statutory	UK	<a href="#">Link</a>
AWS	Hosting	UK	<a href="#">Link</a>
Apache	Hosting	UK	<a href="#">Link</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.

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.

No, the organisation have a similar product with customers and they expect this level of processing.

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

All technical and operational colleagues will be consulted.

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 customers act as the Controller and they are responsible for subject access 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](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 checked="" type="checkbox"/> Consent	<input checked="" type="checkbox"/> Vital interests	<input checked="" 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 checked="" type="checkbox"/> Explicit consent	<input type="checkbox"/> Social security/protection law	<input type="checkbox"/> Legal defence or claim
<input 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?

The data is only shared with the organisation or 3rd parties on their behalf, any related technical products have agreements in place to ensure GDPR requirements are met.

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?

There is a limited data set that can be processed and this is all viewable in the product.

## 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?

There is no requirement to keep data accurate but there is negative consequence, such as emergency subject contact, to not having an accurate dataset.

## 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?

Data is retained for the contract length. On termination of the contract, data is destroyed after 30 days.

## Security

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

Juniper implements a layered security model incorporating technical, organisational and procedural controls, all of which operate under our ISO 27001-certified Information Security Management System (ISMS). These controls, together with our Secure Development Policy and wider internal security framework, ensure the confidentiality, integrity, availability and restorability of personal data processed across the Juniper MIS and Pupil Asset platforms.

Our ISMS provides the governance structure for continuous risk assessment, policy enforcement, security monitoring, supplier management, incident response, and ongoing control improvement. All security activities including development, infrastructure management, auditing and vulnerability management are conducted in alignment with ISO 27001 control requirements

AWS hosting environment is secured using a default-deny approach. Firewalls and Security Groups block all traffic unless explicitly permitted. AWS native detection and prevention services (such as GuardDuty and baseline monitoring) provide additional protection. Configuration of network infrastructure is managed by a qualified third-party provider under least-privilege principles.

Monitoring is carried out through New Relic, with a planned transition to AWS CloudWatch for unified cloud-native observability. Logging of application behaviour, warnings, errors and user related changes is maintained within AWS CloudWatch. AWS alarms support detection of anomalous activity, service failures or performance issues, with further improvements planned.

Juniper adheres to secure coding practices governed by the organisation's Secure Development Policy. Source code is protected through controlled GitHub access, encryption of secrets/keys, and RBAC. All material changes follow a formal change-control process using Bitbucket and Jira, with hot-fix workflows for urgent corrective actions. Framework patching is carried out through a combination of automated and manual updates to ensure vulnerabilities are addressed promptly.

User access to the MIS and Pupil Asset platforms is controlled through FusionAuth MFA and role-based access controls. Least-privilege principles ensure users only access data relevant to their functions. Administrative access is tightly restricted and monitored, and internal access management processes ensure appropriate approval, review and revocation cycles.

All data is encrypted in transit and at rest within AWS. Automated point-in-time backups are maintained to allow restoration of data if needed. Backup processes follow AWS best-practice retention and integrity validation, with rapid PIT (Point-In-Time) restoration available to support continuity.

## Juniper Data Protection Impact Assessment

An external security provider performs regular vulnerability assessments across Juniper's network to identify risks and ensure continuous security hardening. Juniper operates SIEM/SOC monitoring capabilities to detect suspicious activity, escalate anomalies and manage incident response. These practices complement the organisation's broader security governance requirements, ensuring ongoing protection against emerging threats.

Automated AWS backups and PIT restoration procedures ensure data can be restored following an incident. These processes support Juniper's business continuity commitments and help ensure service availability and data restorability.



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