

Data Protection Impact Assessment



Pupil Progress

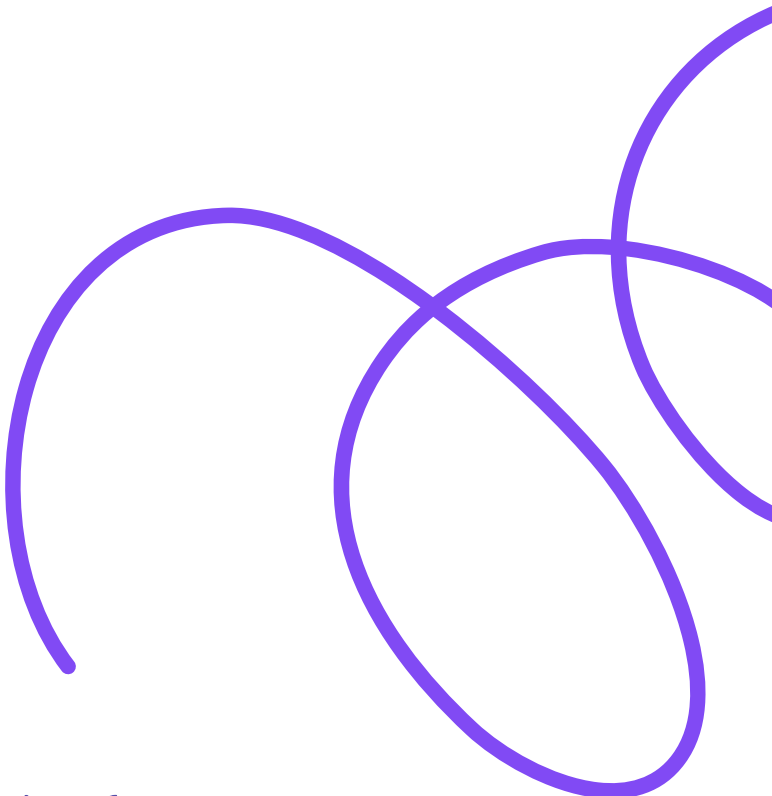
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Juniper

Contents

Data Protection Impact Assessment (DPIA)	3
How to complete a DPIA	3
Screening.....	3
Full DPIA Assessment	3
Part 1.....	3
DPIA Screening	3
Part 2.....	5
About the Processing.....	5



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 will resell Pupil Progress to new and existing secondary school customers. Pupil Progress is an application which provides real-time tracking and monitoring of secondary education students for schools and trusts across all subjects and qualifications.

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

Result of DPIA Screening	Full DPIA required

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~~ 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 customer data will be processed to provide access to the application, which will contain data relating to students.

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, customers will expect data to be processed in the ways envisaged to meet the requirements of the contract in place with Juniper for use of the application.

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 aim is to meet the requirements of the contract in place with Juniper and its customers for use of the Pupil Progress application.

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 commercial and operations teams will process data within Juniper in order to onboard and support customers. Juniper will benefit commercially and financially. Customers will benefit from real-time tracking and monitoring of students across all subjects and qualifications.

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 data within the application will be provided by the customer via their MIS. They will use the application to monitor, analyse and report on student performance.

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.

Data will be fed into the Pupil Progress cloud application from customers' MIS application using Groupcall Exporter.

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
Pupil Progress	To provide student performance tracking application	UK	Privacy & Policy Hub - Pupil Progress
Groupcall Exporter	Facilitates transfer of data from MIS to Pupil Progress	UK	Xporter on Demand For Schools
AWS	Hosts Pupil Progress app	UK	https://docs.aws.amazon.com/whitepapers/latest/navigating-gdpr-compliance/aws-data-processing-addendum-dpa.html
FRAM	Development and support of Pupil Progress	EU	Privacy Policy FRAM
Google	Transfer and handle comms in Pupil Progress app	EU	https://policies.google.com/privacy?hl=en
HubSpot	Records Pupil Progress	EU	https://legal.hubspot.com/

Juniper Data Protection Impact Assessment

	customer info		
Product Fruits	Support for Pupil Progress	EU	https://productfruits.com/docs/
Intercom	Support for Pupil Progress	EU	https://www.intercom.com/legal/data-processing-agreement
Loom	Support for Pupil Progress	US	https://support.loom.com/hc/en-us/articles/360002228758-GDPR-compliance
Typeform	Support for Pupil Progress	EU	Security & privacy standards at Typeform – Help Center
Thinkific	Hosts the Pupil Progress Academy for support	CA	https://www.thinkific.com/dpa/

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.

Internal consultation will take place within Juniper.

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

Group Data Protection Officer (GDPO).

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 are the data controllers and are responsible for data subjects' rights 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 type="checkbox"/> Performance of a contract	<input 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 type="checkbox"/> Legal defence or claim
<input type="checkbox"/> Employment law	<input type="checkbox"/> Vital interests	<input checked="" 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?

Standard contractual clauses.

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?

Customers are entirely responsible for the data uploaded to the application.

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 are entirely responsible for maintaining the data within the application.

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?

Juniper processes existing customer data for 8 years and will delete all terminating customer data within 90 days. Pupil Progress processes all 'active' data (data that has been provided and is linked to active accounts on a verified licence) until the following:

- If your subscription or trial subscription licence has run out, access to the live platform is revoked for all users after a 90 day period.
- Subsequently, platform data is retained until one of the following conditions has been met;
 - If the subscription expiry date is between the 1st of September and the 31st of March, the live platform data will be securely deleted in the following August.
 - If the subscription expiry date is between the 1st of April and the 31st of August, the live platform data will be securely deleted in the following January.
- We also operate a rolling backup that retains information for 90 further days following live platform deletion.

For example, if a subscription expired on the 22nd of February 2027, the live platform data would be deleted on a date within August such as 31st August 2027. The rolling backup would then retain the information for 90 further days until the 29th of November 2027.

We provide a way for you to download a complete copy of all Personal Data held on Pupil Progress before termination.

If you request it, we will provide written certification that all Personal Data has been completely deleted in line with the guidance within the right to erasure. If required and requested, we will erase the data without undue delay, which is generally considered to be about a month in line with Articles 17 & 19 of the GDPR.

Security

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

Please refer to [APupil Progress App: How we keep your data safe](#)



Juniper

*WE LOOK AFTER YOU, SO THAT YOU
CAN LOOK AFTER OUR CHILDREN*

[Junipereducation.org](https://www.junipereducation.org)

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