



# Data Protection Impact Assessment



Education Finance Services

Date: 16/09/2026



Juniper

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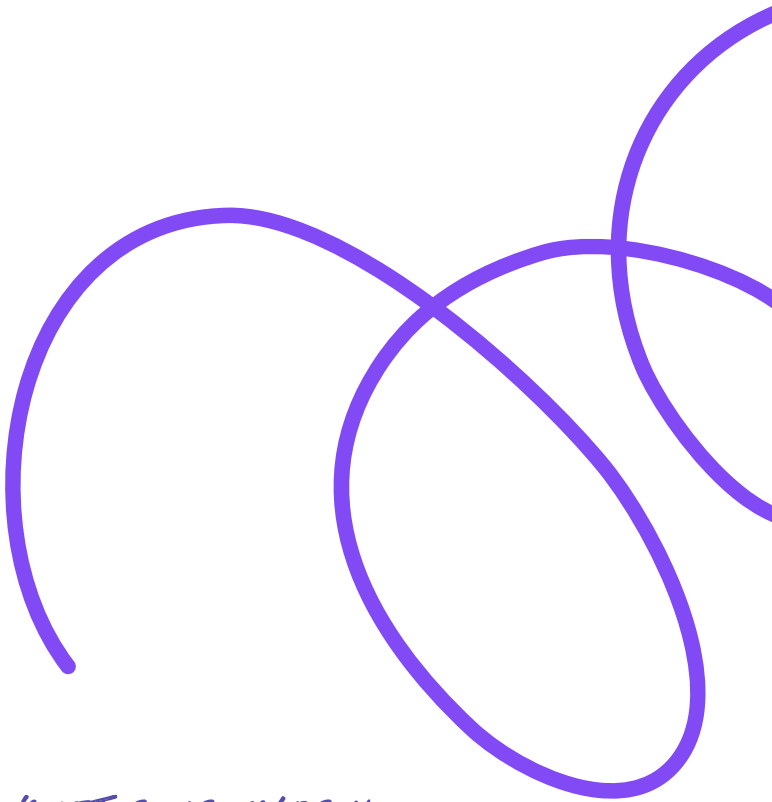
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# Data Protection Impact Assessment (DPIA)

## 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.

Juniper Education Finance (Managed Service) provides schools and academy trusts with specialist finance support to help them meet their statutory and financial management responsibilities.

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

- Budget setting and monitoring
- Financial reporting
- Payroll and accounting support
- Compliance with Department for Education (DfE) and Local Authority (LA) requirements
- Strategic financial advice to support effective decision-making

## 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   | 16/09/2026         |
| 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 the 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/trusts (teaching, administrative, support, business/finance staff).

Past staff of our customer schools/trusts, where historic payroll or finance records are retained. Pupil-level budget data (e.g. SEN/EHC plan-type categories) is referenced using pupil initials only – no further identifying or medical detail is held.

Special category data (e.g. health/absence) and criminal offence (DBS) data is processed only where Education Finance is providing a bursar service that includes HR responsibilities, or covering HR capacity gaps for a customer – not as part of core Finance processing.

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

Members of the public (next of kin 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.

Yes. School and Trust staff reasonably expect their finance/payroll/ HR data to be processed by Juniper as part of the outsourced finance service commissioned by their employer. This is disclosed via the customer contract and staff privacy notices. No new or unexpected uses (e.g. marketing) are introduced.

## 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 Finance Managed Service provides schools and academy trusts with specialist finance support to help them meet their statutory and financial management responsibilities. This includes budget setting and monitoring, financial reporting, payroll, HR and accounting support, compliance with the Department for Education (DfE) and Local Authority (LA) requirements, and strategic financial advice to support effective decision-making.

## 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?

Education Finance Team.

Processing is essential for the performance of the contract.

Schools/Trusts benefit from specialist, compliant financial management support; 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:

Budget setting, monitoring and reporting for schools/trusts, including SEN/EHC-related budget lines (recorded by pupil initials only, no medical detail).

Payroll and accounting support, including access to bank statements and payroll records (via Catalyst, and in future via Juniper People and Payroll).

HR support, including creating and sending staff contracts, absence/sickness records and DBS/criminal record check administration – carried out when providing a bursar service that includes HR responsibilities, or a managed HR service where the customer's own HR team has no capacity.

Handling customer finance enquiries by phone and email (Zendesk), which may include budget planners or staffing calculators containing school and staff names.

Recording sales handover information (contact details, what has been purchased) and Education Finance visit reports in Sugar CRM.

Providing remote support sessions to customers (NinjaOne), which may involve sharing files such as budget planners or staffing calculators, and which are only screen-recorded with the customer's explicit consent given at the start of the session; recording is turned off immediately if the customer declines.

Supporting schools' own finance systems under individual consultant logins, and in a small number of cases assisting with day-to-day banking administration (file upload/statement download only – no payment or approval capability).

The purpose is to:

Enable schools/trusts to meet statutory financial management and compliance requirements.

Provide accurate, timely payroll and financial reporting.

Support schools with specialist finance expertise they may not hold in-house.

## 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 Outlook (Exchange Online via Juniper's tenant, TLS in transit). Data flows: emails and calendar items.

Shared network drives / Excel – budget, payroll and reporting files.

SugarCRM – contact details and record of what the customer has purchased; Education Finance visit reports.

Zendesk – customer finance enquiries by call and email; emails may include budget planners or staffing calculators containing school/staff names.

NinjaOne – remote support tool used for customer support sessions; may involve sharing files (e.g. budget planners or staffing calculators containing school/staff names). Sessions are only screen-recorded with the customer's explicit consent, obtained at the start of the session; recording is turned off immediately if declined. Recordings are saved locally to the consultant's

~~device~~; the Education Finance Manager has put a process in place requiring any recording older than 30 days to be deleted.

Juniper People and Payroll – Juniper-owned payroll system, now live. Processing activity includes entering overtime, expenses and contract changes; using the month-end payroll reports to process payroll; and reviewing the prepay report before payroll is finalised.

School-owned finance/MIS systems – customer-owned systems that Education Finance consultants are given individual login access to, in order to provide support under the service contract.

Banking systems (where applicable) – a small number of consultants hold individually-named login/card-reader access to a school's bank account, restricted to file upload and statement download only (no payment or approval capability).

## 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      | Privacy Policy   SugarCRM ( <a href="https://sugarcrm.com/legal/privacy-policy">sugarcrm.com/legal/privacy-policy</a> )                                       |
| Microsoft O365 | Emails and file management                                               | UK      | Data Privacy in the Trusted Cloud   Microsoft Azure                                                                                                           |
| Zendesk Inc.   | Provision of customer support / ticketing platform for finance enquiries | UK      | Zendesk Privacy Notice: <a href="https://zendesk.com/company/agreements-and-terms/privacy-notice">zendesk.com/company/agreements-and-terms/privacy-notice</a> |
| NinjaOne, LLC  | Provision of remote support/screen-sharing platform                      | UK      | NinjaOne Privacy Notice: <a href="https://ninjaone.com/privacy-notice">ninjaone.com/privacy-notice</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 as processing of data is an established, industry-standard activity that does not introduce novel functionality. 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 Education Finance 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 (school/trust) is the Data Controller and handles all rights requests. Juniper acts as Data Processor and will respond only on the Controller's instructions. Customer contracts require schools and trusts to provide privacy information to employees explaining how their personal data may be shared with and processed by Juniper Education Finance in the delivery of contracted services.

## 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 checked="" 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 type="checkbox"/> Legal defence or claim                 |
| <input checked="" 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?

Security settings are set to ensure only Education Finance staff have access to finance/payroll files and systems.

Access to customer-owned finance systems is via individually assigned consultant logins. Where banking access is used, it is restricted to file upload/statement download only, with no payment or approval capability, and is individually named, audited by the bank, and revoked (with the card returned) at the end of the consultant's engagement.

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.

## 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 provided by schools/trusts and updated by Education Finance staff, with sales handover information recorded in Sugar by the Sales team.

Budget and payroll data is reviewed at each budget/payroll cycle.

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 (payroll data, bank statements, SEN budget data, Sugar/Zendesk records) are retained on a rolling basis for up to 6 years while the school/trust remains an active customer, in line with the position confirmed by the Education Finance Manager.

No records are retained after the customer relationship ends – all data is securely deleted/destroyed within 90 days of end of contract.

## Security

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

Access is controlled through Microsoft 365 role-based permissions and restricted access groups.

Multi-factor authentication (MFA) is enforced across corporate systems.

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Endpoint protection, anti-malware monitoring, email security filtering and device management controls are implemented by Group IT.

Access to customer-owned systems (including any banking access) is individually assigned, restricted to file upload/download with no payment capability, and revoked at the end of the consultant's engagement.

Staff receive mandatory annual Data Protection and Information Security training.

Audit logs are available for investigation of inappropriate access (including bank-side audit trails for banking access).

Banking login/ card reader access is revoked and the card returned to the school when the consultant's engagement ends.



# Juniper

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**Client:** Name Here

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