



Data Protection Impact Assessment



People & Payroll

Date: 18/08/2026



Juniper

Contents

Data Protection Impact Assessment (DPIA) 3

 How to complete a DPIA 3

 Screening..... 3

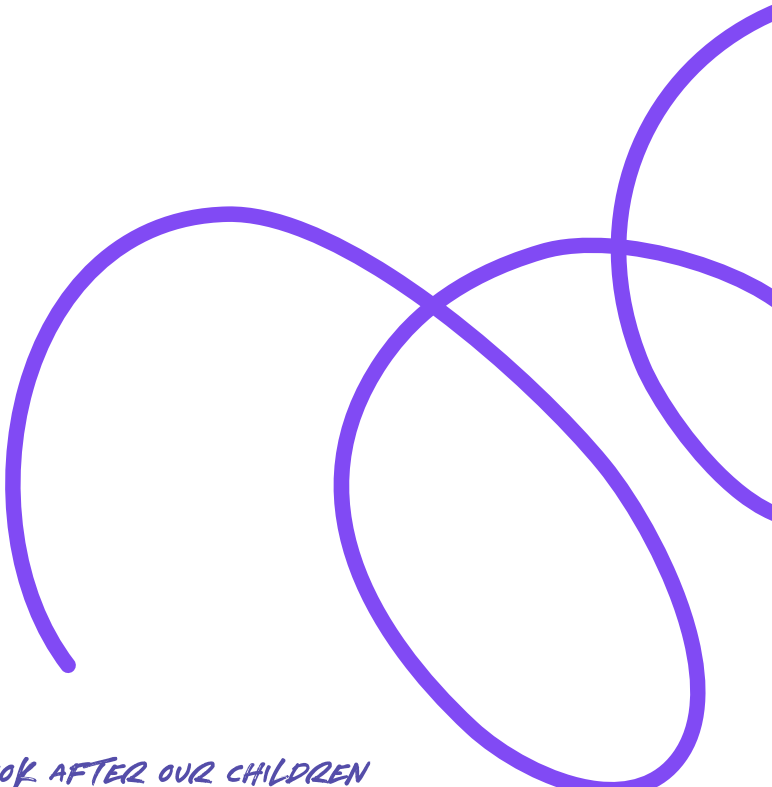
 Full DPIA Assessment 3

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.

This DPIA covers People & Payroll, which is a new (2026) product offering from Juniper Education, which will be used internally by Juniper and available commercially to customers.

Juniper People & Payroll is a new HR and payroll platform being developed by Juniper Education for UK schools and Multi-Academy Trusts. It will replace Juniper's existing payroll/HR product, Catalyst, which is being retired.

The platform is delivered as a Bureau Managed service, where Juniper's own bureau staff carry out payroll and HR processing on the customer's behalf. The system supports multiple user personas: employers and employees, who access the platform via a customer-facing Juniper Portal, and Juniper's own bureau staff, who access a separate internal URL to deliver the managed service. This separation keeps customer self-service access distinct from Juniper's internal processing environment.

The system covers core HR and payroll functions for the employment lifecycle, together with additional modules for Workforce Management, Case Management, and Onboarding and Recruitment. (Not yet live)

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

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	12/10/2026
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.

The subjects are employees of Juniper or employees of Juniper customers.

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.

It is reasonably expected that Juniper employee and Payroll customers would expect their personal data to be used in the ways envisaged to process payroll and manage related functions.

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 purpose of processing the data is to manage all people (HR) and payroll functions.

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 internal and customer-facing Juniper HR and Payroll teams take responsibility for the respective processing. Juniper benefits from cost savings and improved efficiency in relation to its own HR and payroll functions and commercially through the sale of the product to customers. Juniper customers benefit from the use of AI-driven cutting edge payroll technology.

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.

Existing customer HR and payroll data will be migrated into the system using secure tools. The data will then be managed and updated within the system by relevant Payroll staff. Data subjects will have access to their own payroll data.

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.

People & Payroll is hosted in Laravel cloud and supported by Amazon Web Servers (AWS).

Transfer files will be received into People & Payroll securely from existing payroll systems using Python scripts.

Customers will access the system via Juniper Portal.

Mail merge documents will be created securely in a secured version of Libre Office for mail merging and is hosted as a secure instance on fly.io and where a signature is required, Pandadoc (customer's own account). Documents will be presented to data subjects in Juniper Portal or sent securely and password-protected via email using SendGrid.

The system uses AI capabilities from Anthropic to create insights for users. All personal data is removed from any requests sent to external AI services.

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
Laravel Cloud	Hosting, no data processing	EU	N/A
AWS	Storage of data	EU	Cloud.laravel.com
HMRC	FPS Staff information for registering salary payments with HMRC. EPS Organisation information for lodging employer payments with HMRC	UK	
TPS	We provide pension contribution information, there is no automated link this information is submitted manually through the TPS portal	EU	
LGPS	We provide pension contribution information to local authority pension schemes individually by school covering the contributions of their members.	EU	
UNIONS	We provide basic information regarding the membership fees taken from employees for the union subscriptions UNISON, GMBU	EU	
TPAVC / Other Pension Providers	We pass membership contribution data on a monthly basis to	EU	

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

	supplementary pension providers.		
--	----------------------------------	--	--

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 have sought the views from staff within the existing bureau.

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

The Head of Data Security & Compliance will be consulted to ensure all risks from the envisaged processing are understood and properly mitigated.

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?

Where the subjects are employees of Juniper, Juniper is the Data Controller responsible for rights requests. Where the subjects are employees of Juniper customers, the relevant customer is the Data Controllers and responsible for rights' requests from their employees.

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

☐ Consent	☐ Vital interests	☒ Task by a public authority
☒ Performance of a contract	☐ Legal obligation	☐ 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?

☐ Explicit consent	☐ Social security/protection law	☐ Legal defence or claim
☒ Employment law	☐ Vital interests	☐ Substantial public interest
☐ Public health interests	☐ Preventative/occupational medicine	☐ Archiving in public interest
☐ Data manifestly made public by data subject	☐ 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 will not be shared or processed further than described in this DPIA and the contract between Juniper and the customer.

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?

Data will be limited to only what is required to successfully provide payroll services.

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?

The accuracy of the data is the responsibility of the relevant Data Controller. If data is not kept up-to-date it may have a detrimental impact on data accuracy, payroll runs and salary/other payments.

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

Data will be processed for a maximum of 8 years. On termination of a commercial contract, Juniper will return/delete all customer data within 90 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?

No plain text passwords are held anywhere in the system.

It will be 2FA once integrated to the Portal / the bureau side is already this with integration to Microsoft Entra.

All api keys held on behalf of customers or ourselves are encrypted both in transit and rest.

All data in encrypted in transit, with key critical information encrypted at rest as well.

Info on SSL, SSO, other controls in place for third party apps

We connect to all internal services such as the MIS and Portal using Fusion Auth machine to machine authentication.

All processed that utilised external AI models, are both validated in the code reviews.

Data is transferred between systems using HTTPS with machine to machine authentication.



Juniper

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

Junipereducation.org

© 2023 Juniper Education Services Ltd. All rights reserved. This publication is the intellectual property of Juniper Education and no part of it may be reproduced, stored or transmitted by any means without prior permission of Juniper Education. Any unauthorised use for commercial gain will constitute an infringement of copyright.

