Data Protection Impact Assessment

Awards & Activities

Date: 16/10/2026

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.

Awards & Activities is a product in the Juniper eco-system that enables school/MAT customers to celebrate the moments that matter; Recognise achievement, attendance, behaviour and effort in real time, keeping pupils motivated, parents informed and the whole school connected. Awards & Activities supports both the Behaviour & Wellbeing and Parental Engagement SIP areas. Recognising achievement, effort and positive behaviour motivates pupils, while sharing those moments with families in real time strengthens home-school relationships and keeps parents engaged in their child's learning journey. Awards & Activities works seamlessly with the wider JoinUp platform, connecting recognition, parental engagement and pupil information in one place. Whether you're using Sonar Tracker, the Juniper Education App, Comms Hub or Juniper MIS, achievements are shared with the right people at the right time, creating a more connected experience for schools and families.

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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

Date of DPIA Screening	16/10/2026
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.

The people whose data is processed are related to specific Juniper customers, e.g. pupils, parents and school/MAT staff.

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 data controller is a Juniper customer and the subjects would expect their data to be processed in the ways described in order for Juniper to fulfil the contract with the school/MAT.

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 sent content or communications to recipient to keep them informed about their individual child, group or whole class/school.

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. Customers will benefit from the processing as it will allow them to engage and communicate parents, monitor recognition trends across their school/MAT with clear reporting, understand what's being celebrated, identify patterns and use insights to support behaviour and wellbeing. Parents benefit from being kept informed and engaged in their child's learning journey, which improves outcomes for children. Pupils benefit from increased motivation from having their achievement, effort and positive behaviour recognised.

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.

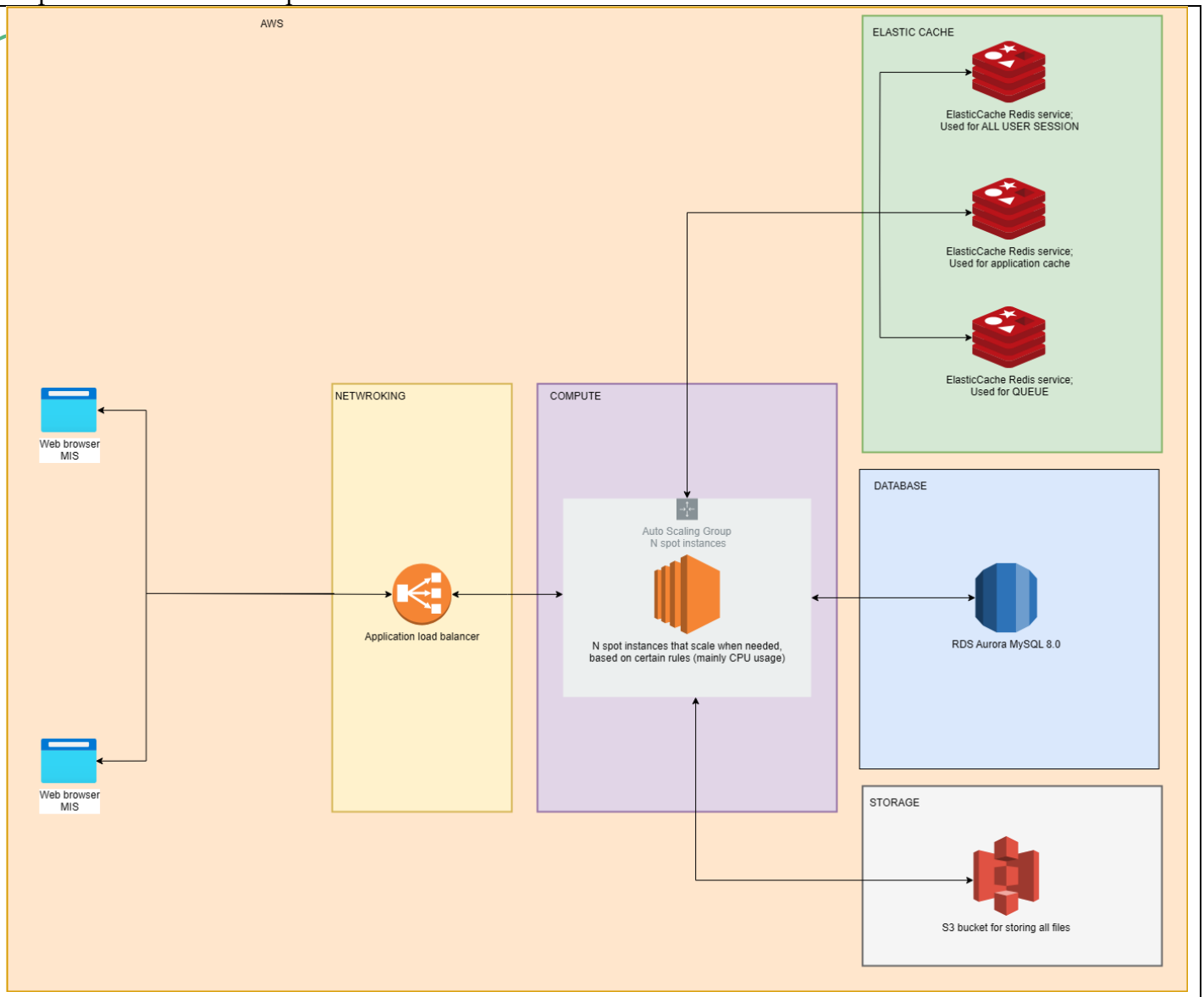
School/MAT users can recognise individuals, groups or whole classes in seconds with points and certificates in order to celebrate the behaviours and achievements that matter, and capture moments in the classroom without adding to teacher workload. They can create custom badges that match their school/MAT's values, learning powers and priorities, add personalised comments and supporting links to give parents meaningful context, share achievements instantly through the Juniper Education App. Parents can respond with emojis and predefined comments, helping schools see engagement without adding to staff workload. Schools/MATs can monitor recognition trends with clear reporting, understand what's being celebrated, identify patterns and use insights to support behaviour and wellbeing.

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.

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Juniper Comms Hub is based on the AWS cloud computing stack. The structures and related products are outlined below.



Comms hub

The Comms hub 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

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	Link
Wonde	Data Share, Statutory	UK	Link
AWS	Hosting	UK	Link
Apache	Hosting	UK	Link
Twilio	Sending SMS	Ireland, EU	Link
AWS Email service	Sending Emails	UK	Link

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, customers 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?

Technical, operational and security/compliance 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 are the Data Controllers and are responsible for subject 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

☐ 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 is only shared with the organisation or listed 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?

Data in Awards & Activities is provided by the customer manually, via APIs or direct from other Juniper products. It is the customer's responsibility to ensure it is kept up to date.

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 processed for the duration of the contract up to a maximum of 8 years. On termination of the contract, data is destroyed 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?

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. 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 platform 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. 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. All API requests are authenticated using OAuth 2.0 client-credentials JWT bearer tokens, issued and scoped by the organisation's identity provider (FusionAuth), with each token limited to a specific audience and read-only scope appropriate to the data being retrieved. Access tokens are short-lived, cached, and automatically refreshed/rotated on expiry or on receipt of a 401/403 response, minimising the exposure window of any individual credential. All API traffic is transmitted over TLS-encrypted HTTPS. Integration with Teacher App • End users authenticate to the Teacher App via the organisation's identity provider (FusionAuth), with single sign-on (SSO) issuing individually-scoped access tokens authentication failures are handled through dedicated exception handling to avoid ambiguous or leaking error responses. • Each API request from the Teacher App is authenticated using a per-user JWT bearer token bound to that user's identity and permissions; the API enforces the same establishment-level and role-based access controls as the Comms Hub web application, ensuring a mobile user can only retrieve data they are authorised to see. • All traffic between the Teacher App and the API is transmitted over TLS-encrypted HTTPS. • Authentication tokens are persisted and tracked (auth token records linked to the underlying identity provider user) to support token lifecycle management, including

revocation, expiry, and refresh, reducing the risk associated with a lost or compromised device.

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