

GOVERNANCE DOCS

UK GDPR and the Data Protection Act 2018

Gap Assessment Report

UK GDPR, the Data Protection Act 2018 and PECR, as amended by the Data (Use and Access) Act 2025

Thameside Lettings (sample)

Personal data of landlords, tenants, applicants and staff across 14 UK branch offices and the lettings platform.

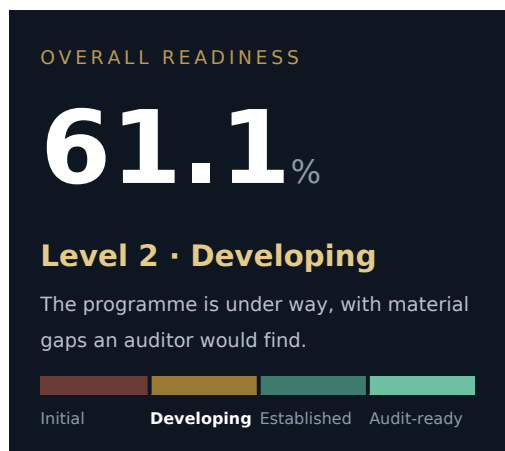
ASSESSED	25 September 2026
EDITION	UK GDPR and DPA 2018 as amended by the Data (Use and Access) Act 2025
IN SCOPE	54 requirements, 54 applicable
PROFILE	Professional services · 50 to 249 people · Information Commission
PREPARED BY	Governance Docs

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Confidential. Prepared for Thameside Lettings (sample) from its own self-assessment; not independently verified by Governance Docs (see section A). Share on a need-to-know basis.

Where Thameside Lettings (sample) stands against UK GDPR



APPLICABLE	EVIDENCED	OPEN GAPS	HIGH PRIORITY
54	14	40	12

STATUS OF EVERY REQUIREMENT



GAPS WITH AN OWNER	WITH A TARGET DATE	NOT ANSWERED
19 of 40	7 of 40	0

WHAT THIS ASSESSMENT TELLS YOU

- Overall readiness is 61.1% against UK GDPR across 54 applicable controls. 14 of them are implemented and evidenced.
- Most open gaps: Lawful basis and principles, with 10 at 35%. Strongest area: Governance and assurance at 92%.
- 13 controls are operating but not evidenced. Collecting their records alone lifts the score to 67.1% (+6.0 points), the cheapest gain available.
- 12 gaps are high priority (not started or only planned); 5 of them are in Lawful basis and principles.

DO THESE FIRST

	PRIORITY	ACTION	OWNER	START FROM
1	HIGH	Put an owner and date against the 5 high-priority gaps in Lawful basis and principles	HR Manager	Lawful Basis Assessment Procedure
2	MEDIUM	Adopt and tailor the Legal Crosswalk Workbook (Excel), which closes 3 open gaps	To assign	Legal Crosswalk Workbook (Excel)
3	LOW	Evidence the 13 controls that already operate (+6.0 points)	To assign	Records the controls already produce

Analysis and priorities

IN ONE SENTENCE

Your compliance programme sits at level 2 with 40 open gaps, requiring immediate evidence collection for existing controls.

AI-assisted analysis, generated from the information the organization provided and checked automatically against the scores and findings in this report. It supports planning and is not an audit opinion; see "Basis of this report and limitation of liability".

FOR SENIOR MANAGEMENT AND THE BOARD

Our data protection readiness score currently stands at 61.1%, placing our programme in the Developing stage with 40 open gaps. While we have operational safeguards in place, we lack the formal evidence and documentation required to satisfy the Information Commission. To protect our business from regulatory exposure and reputational harm, we must invest time and resources into formalising our controls, assigning clear ownership for compliance tasks, and closing our 12 high-priority gaps over the coming quarter.

WHERE YOU STAND

Your organisation completed a self-assessment against the UK GDPR and the Data Protection Act 2018, achieving an overall score of 61.1%. You currently sit at readiness level 2, which is named Developing. This means your data protection programme is underway, but an auditor would find material gaps. Out of 54 applicable requirements, you have 40 open gaps, of which 12 are high priority. Only 19 gaps currently have an owner assigned, and just 7 have a target date set.

WHAT IT MEANS FOR THE ORGANIZATION

The status distribution shows that 13 items are implemented but not evidenced, 15 are partially implemented, 7 are planned, and 5 have not started. This pattern indicates that while foundational intent exists within the business, documentation and formal verification lag behind daily operations. For a professional services organisation of 50 to 249 people, this creates direct exposure to the Information Commission. Without documented evidence and fully realised procedures, you cannot prove accountability during a regulatory inquiry or data subject challenge.

WHERE TO FOCUS FIRST

Your immediate focus must be on evidencing what already runs, which will lift your score to 67.1%. Following that, you need to finish what is partly in place to reach an 81% score. Areas such as lawful basis, international transfers, and processor due diligence require urgent attention because they represent high-priority exposures. By establishing clear ownership and target dates for your remaining gaps, you will build a defensible and structured compliance posture.

1 · EXECUTIVE SUMMARY

PRIORITIES

	PRIORITY	WHY IT MATTERS	FIRST STEP	START FROM	WITHIN
1	Establish lawful basis and special category policies Art 6(1) Lawful basis for each purpose · DPA Sch 1 Pt 4 Appropriate policy document · Art 8 Children's data	Operating without documented lawful bases or appropriate policy documents exposes the organisation to direct regulatory enforcement and fines from the Information Commission.	Draft the lawful basis assessment procedure and assign an owner to review processing activities.	Lawful Basis Assessment Procedure UK GDPR Toolkit – 90 UK Data Protection Templates (DUAA 2025)	30 DAYS
2	Strengthen processor and joint controller due diligence Art 26 Joint controllers · Art 28(1) Processor due diligence	Inadequate oversight of external processors and joint controllers creates legal exposure and increases the risk of unmanaged third-party data breaches.	Review current supplier contracts against article 28 requirements and list active processors.	Processor Due Diligence Checklist UK GDPR Toolkit – 90 UK Data Protection Templates (DUAA 2025)	60 DAYS
3	Map international transfers and transfer mechanisms Art 46(1A) Transfer mechanisms and the data protection test · Art 44 Mapping transfers	Unmapped international data flows violate cross-border transfer rules and fail the data protection test mandated by the regulations.	Initiate an internal audit of all data flows exiting the United Kingdom to identify international destinations.	International Transfers Procedure UK GDPR Toolkit – 90 UK Data Protection Templates (DUAA 2025)	90 DAYS

30 / 60 / 90-DAY ROADMAP

FIRST 30 DAYS - Assign owners to all 40 open gaps and set target completion dates. - Gather evidence for the 13 items that are currently implemented but not evidenced. - Begin drafting procedures for high-priority lawful basis and consent gaps.	DAYS 31 TO 60 - Finish implementing items that are currently partially in place across the business. - Deploy processor due diligence checklists for all active third-party vendors. - Establish a formal personal data breach register and testing schedule.	DAYS 61 TO 90 - Implement planned items relating to international transfer risk assessments. - Review the 2025 act change register and update legal crosswalk documents. - Conduct a follow-up assessment to measure progress toward full compliance.
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Maturity across the standard

Each bar shows how the requirements in one area break down by status, weakest on the left. The score is the average across applicable requirements; the chips count open gaps by priority.

AREAS	STATUS MIX	SCORE	GAPS H · M · L
Scope and accountability	1 2 2	55%	1 2 2
Lawful basis and principles	3 2 3 2	35%	5 3 2
Transparency and notices	1 1 2	81%	0 1 1
Data subject rights	1 1 2 2	71%	1 1 2
Automated decisions and complaints	2 1	58%	0 2 1
Records and DPIA	3 1	56%	0 3 1
Processors and data sharing	1 1 1 1	50%	2 0 1
Security and breaches	1 4	85%	1 0 0
International transfers	1 2	33%	1 2 0
Marketing, cookies and PECR	1 3	63%	1 0 3
Governance and assurance	1 5	92%	0 1 0

■ Not started ■ Planned ■ Partially implemented ■ Implemented, not evidenced ■ Implemented and evidenced

WHERE THE NEXT POINTS COME FROM

The score after each kind of work, cheapest first. Gold is what that step adds.

Today		61.1%
Evidence what already runs 13 requirements		67.1% +6.0
Finish what is partly in place 15 requirements		81.0% +13.9
Implement what is planned 7 requirements		90.7% +9.7
Start what has not begun 5 requirements		100.0% +9.3

DOCUMENTS THAT CLOSE THE MOST GAPS

Each bar counts the open gaps that name the document as the way to close them.

Legal Crosswalk Workbook (Excel)		3
UK Data Protection Policy		3
Lawful Basis Register (Excel)		3
Lawful Basis Assessment Procedure		2
Special Category and Criminal Offence Data Policy		2
Consent Management Procedure and Consent Form		2

All of these are in the UK GDPR Toolkit (90 documents).

Every open gap, grouped by what has to happen next

Work from the top. Requirements not yet started or only planned are the ones a certification auditor reaches first; the last group already operates and needs only its records.

HIGH Not started · 5

Start from a documented baseline: adopt and tailor the document named below, then put it into operation.

Ref	Requirement	Area	Owner · target	Closes it
Art 6(1)	Lawful basis for each purpose	Lawful basis and principles	HR Manager	Lawful Basis Assessment Procedure · Lawful Basis Register (Excel)
DPA Sch 1 Pt 4	Appropriate policy document	Lawful basis and principles	Compliance Lead 29 Oct 2026	Appropriate Policy Document · Special Category and Criminal Offence Data Policy
Art 8	Children's data	Lawful basis and principles	Operations Manager	Children's Data Procedure · Consent Management Procedure and Consent Form
Art 26	Joint controllers	Processors and data sharing	Compliance Lead 24 Dec 2026	Joint Controller Arrangement
Art 46(1A)	Transfer mechanisms and the data protection test	International transfers	Operations Manager	Transfer Risk Assessment Template · IDTA Completion Guide +1 more

HIGH Planned · 7

Move from plan to implementation. Assign an owner and a date, then put the control into operation.

Ref	Requirement	Area	Owner · target	Closes it
DUAA 2025	The 2025 Act changes	Scope and accountability	Operations Manager	DUAA 2025 Change Register (Excel) · Legal Crosswalk Workbook (Excel)
Art 6(1)(f)	Legitimate interests assessments	Lawful basis and principles	Risk Manager 24 Dec 2026	Legitimate Interests Assessment Template · Lawful Basis Assessment Procedure
Art 7	Consent	Lawful basis and principles	HR Manager	Consent Management Procedure and Consent Form
Arts 16-18	Rectification, erasure and restriction	Data subject rights	To assign	Rectification, Erasure and Restriction Procedure · Rights Request Register (Excel)
Art 28(1)	Processor due diligence	Processors and data sharing	IT Manager	Processor Due Diligence Checklist · Sub-Processor Register (Excel)

Art 33(5)	Breach register	Security and breaches	Risk Manager 7 Jan 2027	Personal Data Breach Register (Excel)
PECR r21	Marketing calls	Marketing, cookies and PECR	Operations Manager 21 Jan 2027	TPS and CTPS Screening Procedure

MEDIUM Partially implemented · 15

Extend the existing approach to the whole scope and apply it consistently, then evidence it.

Ref	Requirement	Area	Owner · target	Closes it
Art 27	UK representative	Scope and accountability	To assign	Data Protection Roles and RACI Matrix · UK Data Protection Policy
Art 5(2)	Accountability	Scope and accountability	To assign	Accountability Framework and Compliance Calendar · UK Data Protection Policy
Art 5(1)	Data protection principles	Lawful basis and principles	HR Manager	UK Data Protection Policy · Legal Crosswalk Workbook (Excel)
Art 8A	Purpose compatibility	Lawful basis and principles	HR Manager 21 Jan 2027	Purpose Compatibility Assessment Template
Art 5(1)(e)	Retention	Lawful basis and principles	Operations Manager	Records Retention Schedule (Excel) · HR Data Retention Schedule (Excel)
Art 13	Privacy notices at collection	Transparency and notices	HR Manager	Privacy Notice Procedure · Customer Privacy Notice +3 more
Art 12A	Time limits for rights requests	Data subject rights	Operations Manager 10 Dec 2026	Data Subject Access Request Procedure · DSAR Log (Excel) +1 more
Arts 22B-22C	Automated decision safeguards	Automated decisions and complaints	To assign	Automated Decision-Making Procedure
DPA s164A	Complaints procedure	Automated decisions and complaints	To assign	Data Protection Complaints Procedure · Complaints Log (Excel) +1 more
Art 30	Records of processing	Records and DPIA	HR Manager	Records of Processing Procedure · Records of Processing Register (Excel)
Art 36	Prior consultation	Records and DPIA	HR Manager	Prior Consultation Procedure · DPIA Template
Art 25	Data protection by design and default	Records and DPIA	To assign	Data Protection by Design and Default Procedure
Art 44	Mapping transfers	International transfers	To assign	International Transfers Procedure · Transfer Register (Excel)

Art 45A	Adequate destinations	International transfers	To assign	Adequacy and Transfer Mechanisms Reference (Excel) · Transfer Register (Excel)
REG	Dealing with the regulator	Governance and assurance	Compliance Lead	ICO Engagement and Regulatory Notices Procedure

LOW Implemented, not evidenced · 13

Collect and file evidence an auditor can sample. The control is operating; what is missing is the record of it.

Ref	Requirement	Area	Owner · target	Closes it
Art 3	Territorial scope	Scope and accountability	To assign	UK GDPR Toolkit Implementation Guide · Legal Crosswalk Workbook (Excel)
DP Charges Regs	Data protection fee	Scope and accountability	To assign	ICO Fee Registration Procedure
Art 6(1)(ea)	Recognised legitimate interests	Lawful basis and principles	To assign	Recognised Legitimate Interests Procedure · Lawful Basis Register (Excel)
Art 9	Special category data	Lawful basis and principles	To assign	Special Category and Criminal Offence Data Policy · Lawful Basis Register (Excel)
Art 14	Data obtained from others	Transparency and notices	To assign	Privacy Notice Procedure · Supplier and Business Contact Privacy Notice
Art 15(1A)	Reasonable and proportionate searches	Data subject rights	To assign	Data Subject Access Request Procedure · DSAR Log (Excel)
DPA Sch 2	Exemptions	Data subject rights	To assign	Schedule 2 Exemptions Guide · Rights Request Register (Excel)
Art 22A	Identifying automated decisions	Automated decisions and complaints	To assign	Automated Decision-Making Procedure · Records of Processing Register (Excel)
Art 35	Data protection impact assessments	Records and DPIA	To assign	DPIA Procedure · DPIA Screening Questionnaire +2 more
Art 28	Processor contracts	Processors and data sharing	To assign	Data Processing Agreement (UK GDPR Article 28) · Processor Clause Guide
PECR r22	Electronic marketing consent	Marketing, cookies and PECR	To assign	Direct Marketing Policy · PECR Compliance Procedure +1 more

PECR r6	Cookies and similar technologies	Marketing, cookies and PECR	To assign	Cookie Policy and Consent Procedure · PECR Compliance Procedure
PECR r5A	PECR breaches for service providers	Marketing, cookies and PECR	To assign	PECR Breach Notification Note for Service Providers

How it was scored

STATUS WEIGHTS

Status	Weight	Meaning
■ Not started	0.00	No policy, process or activity exists for this requirement.
■ Planned	0.25	Approach agreed and scheduled, but nothing is in place yet.
■ Partially implemented	0.50	In place for part of the scope, or inconsistently applied.
■ Implemented, not evidenced	0.75	Operating as intended, but you could not prove it to an auditor today.
■ Implemented and evidenced	1.00	Operating as intended, with records an auditor can sample.
■ Not applicable	—	A justified exclusion. Removed from the score - record why in your notes.

READINESS LEVELS

1 • Initial (0%+)

Most requirements are not yet in place. Build the foundations before thinking about an audit.

2 • Developing (40%+)

The programme is under way, with material gaps an auditor would find.

3 • Established (65%+)

Most controls operate. Remaining work is closing specific gaps and evidencing what runs.

4 • Audit-ready (85%+)

Controls operate and are evidenced. Ready for an internal audit and a certification body.

WHAT THIS REPORT IS

BASIS OF THIS REPORT AND LIMITATION OF LIABILITY

This report is the output of a self-assessment. The scores, readiness levels, gaps, analysis and recommendations in this report are derived solely from the information entered by the organization, and have not been independently reviewed, verified, tested or audited by Governance Docs. Governance Docs did not conduct an independent assessment of the organization, its controls or its operations.

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A control that is running but cannot be evidenced scores 0.75, not 1.00. Auditors sample records, not intentions. Closing that distance is usually the fastest route to a higher score.

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YOUR WORKBOOK

The Excel workbook that comes with this report follows the same sections and colours. Dashboard: sections 1 and 2, recalculated live. Assessment: every requirement; change a status and every score, chart and level updates. Remediation Plan: section 3, with owners, dates and progress since this report. How it was scored: this page.

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