

Gap Assessment Framework — Full Workbook

5 domains · Maturity L1–L5 · Weighted scoring

5 modules · Expand matching sections on [DPOCertification.Org/resources](#)

Domain 1 — Governance (weight 20%)

Criterion	L1 Ad hoc	L3 Defined	L5 Optimised	Current	Target	Gap
Board oversight	No privacy reporting	Quarterly DPO report	Real-time dashboard	—	4	—
Policy lifecycle	Stale PDF on website	Version-controlled	Automated attestation	—	4	—
DPO resourcing	Part-time legal	Dedicated DPO + team	DPO + privacy engineering	—	5	—

Domain 2 — Notice & consent (weight 25%)

Criterion	L1	L3	L5	Current	Target	Gap
Notice quality	Generic privacy policy	Itemised Rule 3 notice	Dynamic notice API	—	4	—
Consent granularity	Bundle accept	Purpose-level CMP	Real-time sync to ROPA	—	5	—

Domain 3 — Data principal rights (weight 20%)

Criterion	L1	L3	L5	Current	Target	Gap
Grievance handling	Email inbox	Ticketing + SLA	Self-serve portal	—	4	—
Erasure workflow	Manual spreadsheets	Orchestrated deletion	Cross-system purge	—	5	—

Domain 4 — Technology (weight 20%)

Criterion	L1	L3	L5	Current	Target	Gap
Discovery	Unknown data stores	Quarterly scan	Continuous classification	—	5	—
DLP	Email DLP only	Endpoint + cloud	ML classification + block	—	4	—

Domain 5 — Vendors & transfers (weight 15%)

Criterion	L1	L3	L5	Current	Target	Gap
TPRM	Spreadsheet	Tiered assessments	Integrated GRC platform	—	4	—
Transfer governance	Ad hoc legal review	TIA template library	Automated transfer register	—	5	—