

# Data Protection Healthcheck for Yateley Town Council



**Healthcheck Date: April 2026**



**BREAKTHROUGH**  
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# Introduction to your council's Data Protection Healthcheck

This Data Protection Healthcheck provides a structured overview of how the council currently approaches key aspects of data protection and information handling.

It is designed to help the council understand where its arrangements are well established, and where there may be opportunities to strengthen clarity, consistency, or confidence.

The Healthcheck is not a data protection audit and therefore it does not provide a formal determination of compliance.

Instead, it brings together responses across a set of practical questions that reflect the day-to-day realities of council work, including governance, record-keeping, decision-making, and how information is handled in practice.

The focus is on identifying patterns rather than judging individual actions or documents.

The resulting ratings offer a high-level view across the UK GDPR principles and individual rights. The ratings are set out as in the table below:

## Results Rating Indicators

**Red** - weakest indication of compliance

Light Red

Amber

Light Green

**Green** - strongest indication of compliance

These ratings are intended to support informed discussion, prioritisation, and proportionate improvement, rather than to highlight fault or risk in isolation.

The Data Protection Healthcheck is designed to provide a helpful baseline for understanding current practice and for planning next steps in a way that is realistic, constructive, and appropriate to the council's time and resources.

# Part 1: Adherence to Data Protection Principles

## Lawfulness Principle

**Rating:** *Green*

### What the Lawfulness Principle Means

The lawfulness principle requires the council to have a valid legal basis for every activity that involves processing personal data. This means being able to clearly explain why personal data is used, which lawful basis applies to each activity, and ensuring this information is documented and communicated appropriately. It also includes understanding when consent is appropriate, how it should be obtained, and what happens if consent is withdrawn. This principle underpins transparency, public trust, and the council's ability to demonstrate compliance if challenged.

### What the Council's Responses Mean

A green rating means the council clearly identifies lawful bases for all processing, consistently maps them to defined purposes, and documents these decisions. Where consent is used, it is managed in a structured and transparent way. Lawfulness is clearly evidenced across council operations.

## Purpose Limitation Principle

**Rating:** *Green*

### What the Purpose Limitation Principle Means

The purpose limitation principle requires the council to collect and use personal data only for specific, explicit, and legitimate purposes. Personal data should not be reused for new or unrelated purposes without proper justification or legal basis. Clearly defining and documenting purposes helps ensure personal data is used appropriately and supports transparency for individuals.

### What the Council's Responses Mean

A green rating means the council clearly defines, documents, and applies processing purposes consistently, ensuring personal data is only used for specific and limited purposes.

# Data Minimisation Principle

**Rating:** *Green*

## What the Data Minimisation Principle Means

The data minimisation principle requires the council to ensure that personal data collected, used, and shared is adequate, relevant, and limited to what is necessary for the stated purpose. This involves considering what information is genuinely required and avoiding the collection or disclosure of excessive personal data. Applying this principle helps reduce risk and supports responsible information handling.

## What the Council's Responses Mean

A green rating means the council consistently assess whether the personal data it collects, uses, or shares is necessary for the intended purpose.

# Accuracy Principle

**Rating:** *Green*

## What the Accuracy Principle Means

The accuracy principle requires the council to take reasonable steps to ensure that personal data is accurate and, where necessary, kept up to date. Inaccurate personal data should be corrected or deleted without delay, particularly where it could affect individuals. This principle supports fairness and good decision-making.

## What the Council's Responses Mean

A green rating means the council consistently maintains accurate personal data and corrects inaccuracies promptly when identified.

# Storage Limitation (Data Retention) Principle

**Rating:** *Green*

## What the Storage Limitation Principle Means

The storage limitation principle requires the council to keep personal data only for as long as it is needed for the purpose for which it was collected. Retention periods should be defined, documented, and applied consistently, with appropriate review and deletion arrangements in place. This helps reduce unnecessary risk and supports accountability.

## What the Council's Responses Mean

A green rating means the council clearly defines, documents, and applies retention periods, with regular review and deletion where appropriate.

# Security Principle

**Rating:** *Green*

## What the Security Principle Means

The security principle requires the council to protect personal data against unauthorised access, loss, misuse, or disclosure. This includes appropriate technical measures, such as secure systems and access controls, and organisational measures, such as policies, procedures, and awareness. Effective security arrangements help maintain public confidence and reduce the risk of data breaches.

## What the Council's Responses Mean

A green rating means the council has comprehensive, well-understood security measures in place to protect personal data.

# Accountability Principle

**Rating:** *Green*

## What the Accountability Principle Means

The accountability principle requires the council to be able to demonstrate compliance with data protection law. This includes having appropriate policies, records, training, and governance arrangements in place. Accountability is about evidence and oversight, not intention, and underpins the council's overall approach to data protection.

## What the Council's Responses Mean

A green rating means the council has documentation and governance arrangements to demonstrate compliance with data protection law.

# Part 2: Adherence to Individual Rights

## Right to be Informed

**Rating:** *Green*

### What the Right to be Informed Means

Individuals have the right to be informed about how their personal data is used. This includes information about the purposes for processing, the lawful basis relied upon, how long data is kept, and the rights available to individuals. This information is usually provided through privacy notices and other transparent communications.

### What the Council's Responses Mean

A green rating means the council consistently provides clear, accessible, and complete information about how personal data is used.

## Right of Access

**Rating:** *Green*

### What the Right of Access Means

Individuals have the right to access their personal data and to receive confirmation of how it is being processed. This includes the right to receive a copy of their data and relevant supplementary information. Councils must be able to recognise and respond to subject access requests within statutory timescales.

### What the Council's Responses Mean

A green rating means the council consistently recognises and handles access requests in line with statutory requirements.

# Right to Erasure

**Rating:** *Green*

## What the Right to Erasure Means

Individuals have the right, in certain circumstances, to have their personal data deleted. This right is not absolute and must be considered alongside legal obligations to retain information. Councils must understand when erasure applies and how to handle requests appropriately.

## What the Council's Responses Mean

A green rating means the council consistently handles erasure requests appropriately and lawfully.

# Right to Rectification

**Rating:** *Green*

## What the Right to Rectification Means

Individuals have the right to have inaccurate personal data corrected and incomplete personal data completed. Councils must understand how to recognise rectification requests and how to update records appropriately.

## What the Council's Responses Mean

A green rating means the council consistently corrects inaccurate personal data when required.

# Right to Object

**Rating:** *Green*

## What the Right to Object Means

Individuals have the right to object to certain types of processing, particularly where processing is based on legitimate interests or public task. Councils must be able to recognise objections and assess them appropriately.

## What the Council's Responses Mean

A green rating means the council consistently recognises and handles objections appropriately.

# Right to Restriction of Processing

**Rating:** *Green*

## What the Right to Restriction of Processing Means

Individuals have the right, in certain circumstances, to request that the processing of their personal data is restricted. This may involve limiting how data is used while an issue is resolved. Councils must understand when this right applies and how to implement restrictions where required.

## What the Council's Responses Mean

A green rating means the council consistently applies restrictions when required.

# Right to Data Portability

**Rating:** *Green*

## What the Right to Data Portability Means

In limited circumstances, individuals have the right to receive their personal data in a structured, commonly used, and machine-readable format, and to transmit that data to another organisation. This right applies only to certain types of processing.

## What the Council's Responses Mean

A green rating means the council clearly understands and applies data portability where applicable.

# Rights Related to Automated Decision-Making

**Rating:** *Green*

## What Rights Related to Automated Decision-Making Mean

Individuals have rights relating to decisions made solely by automated means, including profiling, where those decisions have legal or similarly significant effects. Councils must understand whether automated decision-making takes place and how related rights apply.

## What the Council's Responses Mean

A green rating means the council clearly understands automated decision-making and applies related rights appropriately.

# Part 3: Suggested Next Steps for Yateley Town Council

## Priority Areas to Focus On

### Priority Area - Privacy Notice

A privacy notice has been supplied but this appears to be based on the 2018 template that was supplied to councils. This needs to be updated, as it does not identify specific purposes that the council has, as well as lawful bases for each, and if required an additional condition to process special category data.

**The council should continue to build on the data map that has been created, and use that information to populate a privacy notice that identifies specific purposes that the council has and for each of those purposes specifies what lawful basis is relied upon, an additional condition to process any special category data if used in that purpose, what types of data are processed etc.**

*We recommend the council reviews our bitesize training videos on the Council Hive Hub covering data mapping, lawful bases and special category data.*

## How Breakthrough Communications will support you

### On-demand data protection training

Whether you're a Council Hive or Data Protection Toolkit customer, the Council Hive Hub contains a growing library of council-focused data protection training. By working through these bitesize training videos, officers will be able to determine how to take results of the healthcheck and improve the council's overall approach to data protection training.

This also includes access to a guided pathway of training focused on data protection fundamentals, which makes it easier to work through each stage of the council's data protection journey.

### Live masterclasses and best practice workshops

We run regular deep-dive masterclasses and best practice workshops on Zoom. Our masterclass events are a great opportunity to gain useful insights into specific areas of data protection compliance.

Our best practice workshops are a valuable opportunity to access refresher training and to ask questions of our experts.

### 1-2-1 advice and support for your council

Council Hive Premium customers benefit from unlimited 1-2-1 advice and support calls, whenever you need us. Data Protection Toolkit customers are entitled to two inclusive support calls per calendar year.