

STEER Data Protection Complaints Policy and Procedure 2026 [April 2026]

Your Right to Raise a Concern

If you have concerns about how personal data is handled within our services, you have the right to make a complaint.

We take all data protection concerns seriously and handle them in line with the Data (Use and Access) Act 2025 (DUAA), the Information Commissioner's Office guidance, the UK GDPR, and the Data Protection Act 2018.

Who Handles Your Data

- Your organisation (our customer) is usually the **Data Controller, and determines the data processed and how data is used.**
- We [STEER] act as a **Data Processor**, handling data on documented instructions from the Customer/Controller and provide appropriate technical and organisational safeguards and support Customers in meeting their legal obligations.
- For account and billing data, and for some other limited aspects of our services as described in our Privacy Notices we act as a **Data Controller.**

How to Make a Complaint

You can contact us using:

- **Email:** dpo@steer.global
- **Phone:** 01225 667232
- **Post:** STEER Education, Jasmine House, 7 St Margaret's Street, Bradford on Avon, Wiltshire, BA15 1DA

Please include:

- Your name and organisation
- Contact details
- A description of your concern
- Any relevant account or user details and supporting evidence

What Happens Next

1. Acknowledgement and identity verification

- We will acknowledge your complaint **without undue delay** and always within **30 days**
- Where a parent raises a concern about their child's data, we may request ID verification if STEER is the Controller; we may also seek consent from the child if they are 13 years or older.

2. Investigation

We will:

- Review the issue and relevant system records
- Work with your organisation (if they control the data)
- Involve our data protection and security teams where needed

3. Updates

- We will keep you informed of progress, including any delays in the investigation
- We may contact you if we need more information

4. Outcome

Usually within 60 days, you will receive:

- A clear explanation of our findings
- Details of any actions taken

Possible Outcomes

Depending on the issue, we may:

- Provide findings and explanations
- Not override Controller authority concerning the data
- Direct you to the relevant Data Controller point of contact, where relevant
- Correct or delete data, where authorised
- Restrict or suspend processing
- Improve security or access controls
- Support your organisation in resolving the issue
- Update internal processes or controls

Security Concerns

If your complaint relates to a potential data breach:

- It will be escalated immediately
- We will follow formal incident response procedures
- Notifications will be made where legally required

Working with Your Organisation

Because we provide services to schools and businesses:

- We may need to work with your employer or organisation
- In some cases, they will respond directly to you as the **Data Controller**

STEER Contacts

Data Protection Officer (DPO)

- Email: dpo@steer.global
- Address: Data Privacy and Data Security Services Limited, 45 Albermarle Street, London, WS1 4JL

Escalation to the Regulator

If you are not satisfied with the outcome, you may contact the Information Commissioner's Office (ICO):

- <https://www.ico.org.uk>
- 0303 123 1113

Our Commitment

We will:

- Handle your complaint **fairly and transparently**
- Respond **without undue delay**
- Keep your information secure and confidential
- Use feedback to improve our services