

# Consultation on proposed revisions to ISI's Inspection Complaints Policy for Association School Inspections

Consultation opens: 30 April 2026

Consultation closes: 11 June 2026

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## Introduction

1. ISI is appointed by the Department for Education 'the DfE' to inspect association independent schools in England. ISI is also approved by the DfE to inspect British schools overseas, and by the Home Office to inspect private further education colleges.
2. This consultation is in relation to proposed revisions to ISI's Inspection Complaints Policy for Association School Inspections.
3. In line with the terms of ISI's appointment by the DfE, any changes to our complaints policy must be approved by the DfE.

**The consultation will run from 30 April 2026 to 17:00 on 11 June 2026.**

4. We will comply with **Gunning Principles** in conducting this consultation:

**Formative stage:** These proposals are not final. ISI is consulting before making decisions.

**Sufficient information:** This document provides the proposed revisions to ISI's Inspection Complaints Policy for Association School Inspections and explains what revisions are proposed within each of the three stages of the complaint handling process.

**Adequate time:** Stakeholders have six weeks to respond.

**Conscientious consideration:** ISI will publish a summary of responses and set out what changes will be made, with the reasons why. All responses will be read and considered by decision-makers.

5. This consultation provides a formal feedback mechanism for stakeholders to share views and inform our processes for handling complaints for association school inspections.
6. The consultation is open to all individuals and organisations who may be impacted by ISI's inspection complaints procedure. ISI would in particular like to receive views and responses to the consultation from headteachers, governors, proprietors and school associations.
7. The proposed revisions to our current ISI inspection complaints policy have been informed by:
  - 1) a mid-point review during the year 2025-2026 of the ISI Inspection Framework and the current ISI Inspection Complaints Policy
  - 2) an internal review of the current three-stage complaint procedures, complaints received and complaint outcomes since ISI launched the Inspection Complaints Policy in September 2024 with subsequent revisions in February and November 2025
  - 3) feedback we have received from school associations and nominated representatives on ISI's association inspection meeting (AIM)
  - 4) feedback that ISI and the ISI Board has received from ISI's independent adjudicators.

## Scope of the consultation

8. The scope of the consultation relates to complaints made by association schools about association school inspections.

9. The process for complaints about ISI's non-inspection work is considered outside of scope for this consultation. ISI's Non Inspection Complaints Policy can be found on our ISI website: [ISI Non-Inspection Complaints Policy](#)
10. Under ISI's terms of appointment, in addition to an effective process for dealing with complaints, there must be:
  - 1) an internal review process using members of the inspectorate who were not involved in the original inspection → included in complaints policy
  - 2) a mechanism for independent adjudication of complaints → included in complaints policy
  - 3) arrangements for providing the DfE with information annually about the number and nature of those complaints which were considered at the formal stage of the complaints process → included in complaints policy
  - 4) arrangements for whistleblowers to voice their concerns about the inspectorate without fear of unfair treatment → separate policy (see ISI's [whistleblowing policy](#)).
11. Following the results of this consultation and decisions made, ISI proposes to:
  - 1) Align the ISI Inspection Complaints Policy for British Schools Overseas (November 2025) with any revisions made in this new ISI's Inspection Complaints Policy for Association School Inspections
  - 2) Produce a separate Inspection Complaints Policy for ISI's Student Educational Oversight Framework for Private Further Education Providers (including English language schools).

## Current policy and process

12. Our current policy, ISI Inspection Complaints for All Inspection Remits apart from British Schools Overseas (November 2025), sets out how senior leaders in the schools and colleges that ISI inspects can submit a complaint about our inspection work and explains how we will handle complaints that we receive.
13. The current policy has three stages and the revisions proposed in this consultation are designed to refine and improve our current procedures. In addition, we propose to re-scope the policy so that it pertains solely to complaints about association school inspections, and the draft policy for this consultation is designated as such.

## Purpose of the consultation

14. ISI is continually working to improve policies and processes. The views and experiences of stakeholders play an important part in this process. The purpose of the consultation is to gather feedback about the revisions that ISI is proposing to our procedures for handling and responding to complaints about association school inspections.
15. The consultation outlines proposed revisions to our inspection complaints procedure and post-inspection arrangements.
16. These revisions aim to provide clarity about:
  - 1) the handling and management of complaints in each of the three stages in the policy
  - 2) how we communicate with complainants at stage one and two of the complaint procedures to listen to and scope the complaint
  - 3) about how we will communicate our findings in response to a complaint
  - 4) the timelines for responding to stage two written complaints

- 5) the role of the independent adjudicator at stage three.

### **Anonymous survey with stakeholder role identified**

17. The consultation will be anonymous. The first question will invite respondents to identify the role they have so that ISI can analyse the responses by stakeholders.

18. **Consultation question on role of respondent:**

**1) Please give your role:**

- Headteacher
- Senior leader
- Middle leader (head of department, year group or house, or equivalent)
- Teacher
- Administrative staff
- Governor
- Proprietor
- Parent of a pupil in an association school
- Pupil in an association school
- Association executive or employee
- ISI reporting inspector
- ISI team inspector
- ISI employee
- Other (please specify) **(free text box)**

### **Proposed retentions and revisions**

19. ISI will retain a three-stage process as set out in the policy. This provides opportunity for early resolution during the onsite inspection if issues arise and also allows for a process whereby immediately after the end of the onsite inspection, any unresolved issues can be raised through the complaints process at the post-inspection quality assurance stage.

20. This consultation document focuses on proposed revisions to the current policy only. The proposed revisions seek to refine and improve the existing three-stage complaints process by:

- 1) Clarifying the scope of the policy so it applies only to association school inspections
- 2) Introducing clearer requirements for written complaints and referrals to independent adjudication
- 3) Introducing the use of video calls at certain complaint stages
- 4) Extending response times for stage two complaints
- 5) Articulating principles underpinning complaint handling (clarity and accessibility, fairness, learning, and balance).

### **Proposed revisions to operation of policy**

21. ISI proposes to separate out the policy so that it applies only to association school inspections where the current complaints policy relates to other inspection remits as well. This proposal aims to improve clarity for all stakeholders across the remits we inspect.

22. ISI proposes to clarify in the policy that, while the complaints process does not provide an opportunity for the school to submit further inspection evidence, it does provide the opportunity for the school to make its case within the scope of the policy for ISI to review inspection evidence.
23. ISI does not routinely send complaint responses or publish inspection reports during a school holiday. ISI proposes to give complainants the choice to receive ISI's response to a stage two written complaint during the school's summer holiday. The intention is to prevent delay in the school receiving ISI's response, and to prevent further delay to the publication of the inspection report.
24. ISI proposes to articulate four principles which underpin processes for complaint handling and how ISI will ensure procedural fairness and organisational learning through our complaint handling:
- 1) **Clarity and accessibility:** We will publish our policy in plain English, with clear time limits and multiple access routes (webform, email, telephone, video call).
  - 2) **Fairness:** We quality assure and moderate our processes and evaluations, reaching evidence-based decisions.
  - 3) **Learning:** We use what we learn from complaints to inform training.
  - 4) **Balance:** we identify and manage vexatious complaints and/or harmful behaviours to promote effective implementation of our complaints policy and to protect our staff.
25. **Consultation questions on proposed revisions to policy remit:**
- 2) **To what extent do you agree with the proposal to separate ISI's association inspection complaints policies to apply solely to this remit?**
  - 3) **To what extent do you agree with the proposal to clarify that the complaints process does not provide schools with the opportunity to submit further inspection evidence?**
  - 4) **To what extent do you agree with the proposal to give schools the option of receiving ISI's written complaint response during the summer holiday?**
  - 5) **To what extent do you agree with the proposal to articulate four principles which underpin ISI's complaint handling?**
  - 6) **Do you have any comments on the proposals in this section? (free text response)**

### Proposals for Stage One Informal Resolution

26. The current policy ensures that schools have the opportunity to raise any concerns with the reporting inspector or ISI head office during the school inspection, promoting early informal onsite resolution. The stage one complaint process provides opportunity for schools to submit any concerns they may have as part of the post-inspection quality assurance process. The process of submitting an online request form for stage one complaints remains unchanged. ISI will arrange a call with the complainant to discuss matters of concern.
27. It is proposed to clarify that this call will be a video call rather than a telephone call and that ISI will arrange a follow-up video call with the school to explain how matters were considered as part of the post-inspection review. It is proposed that ISI will not respond in writing at this stage.
28. **Consultation questions:**
- 7) **To what extent do you agree with the proposal to have video calls at the informal resolution stage?**
  - 8) **Do you have any comments on the proposal in this section? (free text response)**

## **Proposals for Stage Two Written Complaints**

29. Stage two written complaints can be made after the complainant has received the draft inspection report.
30. It is proposed that a complaint about the evaluations reached in the draft inspection report must identify the paragraphs of the draft inspection report to which the complaint relates and explain the basis for the complaint.
31. It is proposed that ISI may request a video call with the complainant if, in ISI's view, clarification of the written complaint is needed. This proposal is a change to current practice whereby a school may request a call from ISI at this point.
32. It is proposed to extend the time that ISI has to respond to your written complaint from ten term-time working days to 20 term-time working days. This would enable thorough consideration of the complaint with fewer delays and/or deadline extensions.

### **Consultation questions**

- 9) To what extent do you agree with the requirement to identify the paragraphs of the inspection report to which complaints about evaluations relate?**
- 10) To what extent do you agree with the proposal that ISI may request a video call to clarify the nature of the complaint?**
- 11) To what extent do you agree with the proposal to extend the time for ISI to respond to a written complaint to 20 term-time working days?**
- 12) Do you have any comments on the proposals in this section? (free text response)**

## **Proposals for Stage Three referral to independent adjudicator**

33. It is proposed that a complainant who requests a referral to the independent adjudicator must demonstrate how ISI has not followed the complaints policy and/or has responded unreasonably.
34. It is proposed, that on receipt of a request, ISI will review the request within five term-time working days to decide whether the complainant has demonstrated the required criteria for referral, and therefore whether or not a referral will be made.
35. It is proposed to clarify the meaning of 'unreasonable' by reference to the definition in law of unreasonableness known as 'Wednesbury unreasonableness'.
36. It is proposed that if the written submission for request to independent adjudication does not set out clearly how the complainant considers that ISI has failed to follow process and/or has acted unreasonably, ISI will not refer the school's request to independent adjudication.
37. It is proposed to clarify that further evidence is not required because the complainant will have already submitted a written complaint and ISI will already have responded in writing. Therefore, duplicate, new or unrelated evidence, or evidence irrelevant to the scope of the referral to the independent adjudicator will be disregarded.
38. It is proposed that when a referral is made to the independent adjudicator, ISI will provide the name

and short biographical detail of the allocated independent adjudicator in confidence and for information only. It is proposed that the complainant is not permitted to contact the adjudicator directly and ISI reserves the right to consider a complaint as discontinued if this were to occur.

**Consultation questions:**

- 13) To what extent do you agree with the proposal to require a complainant to set out the reasons for referral to the independent adjudicator?**
- 14) To what extent do you agree with the proposal clarifying that no further evidence will be considered at this review stage?**
- 15) To what extent do you agree with the proposal to provide the name and brief biographical detail of the independent adjudicator to the complainant?**
- 16) To what extent do you agree with the proposal to clarify that direct contact must not be made to the independent adjudicator by the complainant, and that ISI reserves the right to discontinue the complaint if any such contact is made?**
- 17) Do you have any comments on the proposals in this section? (free text response)**

**Final question for additional comments**

- 18) Do you have any other comments or feedback on the proposals? (free text response)**

**Promoting the consultation and analysing feedback**

39. ISI will engage with association schools and other stakeholders about the revisions proposed in this consultation by:

- Writing to school leaders of all association independent schools setting out the revisions proposed in this consultation and how school leaders and proprietors can share their views and responses with us
- Inviting stakeholders to complete a questionnaire, which is available [online](#) and hosted by SmartSurvey.

40. Any submissions ISI receives offline will be reviewed and included in the final analysis and our consultation response report.

41. ISI will process consultation data in accordance with requirements of the Data Protection Act (2018) and ISI's own [privacy notice](#) and other [internal policies](#) about how we collect, handle and manage data.

**Consultation questions**

42. The **18 consultation questions** are outlined in each section of this consultation document and are published in the [online survey](#).

**43. The consultation will run from 30 April 2026 to 17:00 on 11 June 2026.**

44. All of the questions are optional, apart from the initial screening questions. The question format is consistent throughout.

45. Participants will have five options to choose from as follows:

- 5 = Strongly agree
- 4 = Agree
- 3 = Neither agree nor disagree
- 2 = Disagree
- 1 = Strongly disagree

46. There is an **optional free text box at the end of each section ‘Do you have any comments on the proposals in this section? (free text response)’** enabling participants to provide their suggestions and views

**How to respond**

- 47. If you require any of the materials in an alternative format, please contact [consultation@isi.net](mailto:consultation@isi.net)
- 48. ISI would like as many stakeholders as possible to be able to participate in this consultation.
- 49. If you think this survey is not meeting accessibility requirements or you are print impaired, then please email [consultation@isi.net](mailto:consultation@isi.net) or call 0207 600 0100. We will review your request and aim to contact you within two working days to discuss your needs.
- 50. If you have any questions relating to the consultation, then please email [consultation@isi.net](mailto:consultation@isi.net).
- 51. ISI’s current ISI Inspection Complaints Policy (November 2025) can be downloaded from the [ISI website](#). If you require this document in another format, then please email [consultation@isi.net](mailto:consultation@isi.net) or call 0207 600 0100.

**Proposed timeline and next steps**

<b>Consultation opens:</b>	Midday 30 April 2026
<b>Consultation closes:</b>	17:00 on 11 June 2026
<b>Analysis and consideration of responses:</b>	11 June 2026 to 26 June 2026
<b>Publication of consultation outcome and final revised policy:</b>	Week commencing 6 July 2026
<b>Implementation of the revised policy and procedures:</b>	1 September 2026

- 52. ISI will **publish an outcome report from the consultation.**
- 53. This will include a statistical summary of the responses received and the changes that ISI has made or not made and the reasons why. We will make clear how we will make changes to our procedures and when these will come into force within our ISI Inspection Complaints Policy for Association School Inspections.
- 54. ISI staff who are not involved in any decision making about the outcomes of the consultation will handle the responses and feedback we receive.



## Consultation questions

### 1. Please give your role:

- Headteacher
- Senior leader
- Middle leader (head of department, year group or house, or equivalent)
- Teacher
- Administrative staff
- Governor
- Proprietor
- Parent of a pupil in an association school
- Pupil in an association school
- Association executive or employee
- ISI reporting inspector
- ISI team inspector
- ISI employee
- Other (please specify) **(free text box)**

### Consultation questions on proposed revisions to policy remit:

2. To what extent do you agree with the proposal to separate ISI's association inspection complaints policies to apply solely to this remit?
3. To what extent do you agree with the proposal to clarify that the complaints process does not provide schools with the opportunity to submit further inspection evidence?
4. To what extent do you agree with the proposal to give schools the option of receiving ISI's written complaint response during the summer holiday.
5. To what extent do you agree with the proposal to articulate four principles which underpin ISI's complaint handling?
6. Do you have any comments on the proposals in this section? (free text response)

### Proposal for stage one informal resolution

7. To what extent do you agree with the proposal to have video calls at the informal resolution stage?
8. Do you have any comments on the proposal in this section? (free text response)

### Proposal for stage two written complaints

9. To what extent do you agree with the requirement to identify the paragraphs of the inspection report to which complaints about evaluations relate?
10. To what extent do you agree with the proposal that ISI may request a video call to clarify the nature of the complaint?

11. To what extent do you agree with the proposal to extend the time for ISI to respond to a written complaint to 20 term-time working days?
12. Do you have any comments on the proposals in this section? (free text response)

**Proposal for stage three referral to the independent adjudicator**

13. To what extent do you agree with the proposal to require a complainant to set out the reasons for referral to the independent adjudicator?
14. To what extent do you agree with the proposal clarifying that no further evidence will be considered at this review stage?
15. To what extent do you agree with the proposal to provide the name and brief biographical detail of the independent adjudicator to the complainant?
16. To what extent do you agree with the proposal to clarify that direct contact must not be made to the independent adjudicator by the complainant, and that ISI reserves the right to discontinue the complaint if any such contact is made?
17. Do you have any comments on the proposals in this section? (free text response)

**Final question for additional comments**

18. Do you have any other comments or feedback on the proposals? (free text response)

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2026

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