

Independent Schools Inspectorate

Inspection Complaints Policy for British Schools Overseas

November 2025

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POLICY OWNER	Director Legal and Complaints
APPROVED BY:	ISI Board and Department for Education
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Contents

Contents	2
Introduction	3
Publication of report.....	5
Resolution of issues while inspectors are at the school.....	6
Stage one complaint (informal)	7
Stage two complaint (formal)	8
Stage three complaint (referral to independent adjudicator).....	10
Independent adjudicator response	10
Independent adjudicator pool	11
Our commitment to our complaints policy.....	12
Persistent or vexatious complaints	13
Data protection.....	14
Table of key changes	14

Introduction

1. The Independent Schools Inspectorate ('ISI') is an independent inspectorate, appointed by the Department for Education¹ ('DfE') to inspect association independent schools in England. We are also approved by the DfE to inspect British schools overseas ('BSO') and providers of International Qualified Teacher Status ('iQTS'), and by the Home Office to inspect private further education colleges ('PFE').
2. The aim of this policy is to ensure that senior leaders in schools seeking BSO accreditation that we inspect know how to make a complaint about our inspection work and understand how we will handle complaints that we receive. We may treat communication with us as a complaint under this policy at our discretion if we reasonably consider that this is the best way to respond to the content of that communication.
3. Complaints under this policy will only be considered if they relate to ISI's BSO inspection work. A complaint about an inspection will be within scope of this policy if it relates to:
 - the conduct of inspectors; and/or
 - the inspection process; and/or
 - the evaluation/s reached.
4. Whilst most inspections do not lead to a complaint, we take seriously any complaint we receive and will respond to it in accordance with this policy.
5. We welcome feedback from individuals and organisations on all aspects of our work. We listen to complaints, treat them seriously, and learn from them so that we can continuously evaluate and improve our work.
6. We collect feedback on the experience of school leaders who have submitted a formal complaint, including through a complainant satisfaction survey. This is used to support ongoing improvement in how ISI handles complaints.
7. We will only consider complaints about inspections from the most senior leader in the school or education provider inspected, who is or will be named on the inspection report. This may be the headteacher, principal, chair of governors or proprietor. ISI may include the proprietor in correspondence relating to the complaint. ISI will send stage one and stage two complaint responses and any response by an independent adjudicator to both the headteacher and the proprietor of the school.
8. Complaints about ISI's other inspection remits are considered under a separate inspection complaints process. To make a complaint about ISI's inspection work in other remits please refer to the separate ISI inspection complaints policy.

¹ References to the DfE in this policy relate only to the inspection of association independent schools in England

9. Complaints about ISI's non-inspection-related activities are be considered under a separate complaints process. To make a complaint about ISI's non-inspection work, please refer to ISI's non-inspection complaints policy.
10. We shall endeavour to remain within the deadlines set out in this policy wherever possible, but if circumstances indicate that this may not be possible, we shall contact you with an explanation and a revised deadline.
11. If your complaint is upheld, we will acknowledge this. Our response will depend on the particular circumstances of the complaint. It may include an explanation, acknowledgement of responsibility, apology and/or remedial action².
12. Throughout this policy, 'working days' refers to the school's term-time Monday to Friday working days.
13. Where more than one complaint is received by us from a school or education provider about the same inspection, we will treat them as one complaint.
14. We reserve the right at our discretion to treat any correspondence from the school following an inspection that raises issues about that inspection as a complaint under this policy. For the avoidance of doubt this right does not mean that any such correspondence will be treated as a complaint. Complainants must follow the process outlined in this policy for the submission of an informal or formal complaint.
15. We will respond to complaints about our inspection work fairly, and thoroughly.
16. We understand that issues may be raised that relate to the conduct of individual inspectors or members of ISI staff. We request that any such complaints, while by their nature relating to individuals, focus on the specific conduct issue that is being raised.
17. Throughout this policy 'us', 'we' and 'our' refer to ISI; 'you' and 'your' refer to the most senior leader in a school or education provider that has been recently inspected by ISI.

Turn page: Publication of report

² This may include: reviewing or changing a decision; revising published material; revising procedures, policies or guidance to prevent the same thing happening again; training or supervising staff; or any combination of these.

Publication of report

18. Where the outcome of a BSO inspection is that the school does not meet one or more of the BSO Standards, ISI will not issue or publish an inspection report. Failure to meet all of the BSO Standards means that BSO accreditation will not be granted by the DfE. The school will therefore not be required to publish an inspection report.
19. In these circumstances, ISI will provide the headteacher with a document containing the inspection findings. This is to aid school improvement. The inspection findings document will make clear what the school needs to do in order to meet the BSO Standards. The inspection findings document will also be shared with the DfE.

Turn page: Resolution of issues while inspectors are at the school

Resolution of issues while inspectors are at the school

20. It is very important that you speak to the reporting inspector about any issue you have about an inspection as soon as possible while the inspection is still happening. We expect you to do this if you have concerns during the onsite inspection. This enables the reporting inspector to deal with any issues as they arise. The reporting inspector will also make a note of these, and any explanations provided or actions taken in response. The reporting inspector will meet you regularly and will try to resolve any issues as quickly as possible.
21. On inspection, the reporting inspector will provide the headteacher with the phone number for ISI's head office³. The headteacher or senior leader may phone this number to request a call back from a senior member of ISI staff during the onsite inspection. This number is provided so that the headteacher or senior leader can let us know if they have serious concerns that they feel unable to raise directly with the reporting inspector.
22. We value and prioritise open communication between school leaders and inspection teams on inspection. Our inspectors will have clear and regular communication with school leaders throughout the inspection.

Turn page: Stage one complaint (informal)

³ 0207 600 0100

Stage one complaint (informal)

23. If you feel the reporting inspector was unable to resolve your concerns during the onsite inspection, you can raise your concerns informally with ISI by requesting a phone call. This must be done by completing and submitting the following [online form](#) within **four term-time working days** of the end of the onsite inspection.
24. Following receipt of your request, we will call you to listen to your concerns. We will ensure the issues you raise are considered by the quality assurance team within our post-inspection quality assurance process.
25. We will try to resolve your concerns at this early stage of our inspection quality assurance processes.
26. We will send you a brief summary outlining our response to the issues you have raised at this informal stage. We will do this before or at the same time as we send you the draft inspection report.
27. We will not accept written complaints at the informal stage.

[Turn page:](#) **Stage two complaint (formal)**

Stage two complaint (formal)

28. In accordance with our post-inspection processes, we will send the draft inspection report to you for a factual accuracy check (FAC)⁴ together with a FAC form for you to fill in with any matters of factual accuracy. You should submit your FAC response within **five term-time working days** of receiving the draft report. ISI will respond to any points that you raise in relation to factual accuracy on the FAC form. You should not use the FAC form to raise any matters other than in relation to factual inaccuracy in the text of the draft inspection report.
29. **If you wish to raise matters that go beyond factual accuracy (for example inspector conduct, the inspection process or the evaluations reached) you must submit a stage two formal written complaint about these matters.** Any such complaint must be submitted within **five term-time working days** of receiving the draft inspection report (which is the same deadline as for return of the FAC form to ISI).
30. In cases where a school has been provisionally judged to have not met one or more of the Standards, ISI will issue a document to the school detailing the inspection findings. ISI will not issue an inspection report and the headteacher will not be invited to submit a factual accuracy response. The headteacher may use this document as the basis for any complaint at stage two.
31. You can submit a formal written complaint even if you have not previously requested informal resolution at stage one.
32. To submit a stage two formal written complaint, you must complete and submit the following [online form](#).
33. We will review your complaint. You may indicate on the form if you would like a phone call with the person undertaking the review to discuss your complaint.
34. We will normally respond in writing to your stage two complaint within **ten term-time working days**. Occasionally, our response to your stage two complaint may take longer, in which case we will write to you with a revised timescale.
35. Our complaint response will be sent at the same time as our response to your factual accuracy check and the issue to you of the final report for publication.
36. Our response will explain whether we uphold part, all or none of your complaint and why, and any steps we will take as a result.

⁴ The FAC process is when we send you the draft inspection report for a factual accuracy check. We will ask you to complete the factual accuracy check within five term-time working days of receiving the draft inspection report.

37. In cases where a school was provisionally found to have not met one or more of the BSO Standards, and the outcome of the complaint process finds that the BSO Standards are met, ISI will issue a draft inspection report and the school will be invited to complete a FAC response within five working days of the draft inspection report.

Turn page: Stage three complaint (referral to independent adjudicator)

Stage three complaint (referral to independent adjudicator)

38. If you feel that we have not followed this policy in handling your complaint and/or we did not reach a reasonable decision in response to your complaint, you may request referral of your stage two complaint and our response to the independent adjudicator for review.
39. If you choose to do this, you must complete and submit the following [online form](#) within **three term-time working days** of receiving our response to your stage two complaint.
40. We will copy you into the referral to the independent adjudicator, who will review your complaint and our handling of it. Confidential or restricted information (such as inspection evidence) will be sent directly by ISI to the independent adjudicator without being copied to the school.
41. Following referral, the independent adjudicator will consider whether:
- We followed this policy properly in handling your complaint; and/or
 - We reached a reasonable decision in response to your complaint.
42. Referral to the independent adjudicator will not automatically delay the publication of any inspection report unless ISI agrees to postponement.
43. Requests for deferral of publication of a BSO report should be made directly to complaints@isi.net within **three term-time working days** of receipt of ISI's response to your stage two complaint, providing reasons for your request.

Independent adjudicator response

44. The independent adjudicator will send their draft response to us. If we consider that any part of the independent adjudicator's response goes beyond the scope of this policy, we will inform the independent adjudicator within **two working days**. We will not comment on the conclusions and/or any recommendations drawn by the independent adjudicator that are within the scope of ISI's complaints policy.
45. The independent adjudicator will aim to send the final response within **20 term-time working days** of your referral, subject to the availability of an independent adjudicator to complete the review within this timeframe. If this is not possible, we will let you know the revised timeframe.
46. You will receive a final response directly from the independent adjudicator. We will receive the final response at the same time.
47. If the independent adjudicator finds that we did not follow this complaints policy and/or reach a reasonable decision in response to your complaint, the independent adjudicator will tell you why and refer the complaint back to ISI for reconsideration. We will write to you to outline the

steps ISI will take as a result within **five term-time working days** of receiving the response from the independent adjudicator.

48. If the report has not already been published and the independent adjudicator does not refer it for consideration by ISI, we will publish the report on the ISI website **five-term working days** after you and we have received the decision of the independent adjudicator.
49. The decision of the independent adjudicator is final. ISI will not engage in further correspondence after the complaints process has been concluded.

Independent adjudicator pool

50. ISI has a pool of independent adjudicators who are appointed by the ISI Board. ISI independent adjudicators are recruited through an external process based on their relevant knowledge, skills and experience. ISI publishes information about the recruitment process and person specification for the independent adjudicator role on the ISI website.
51. You will receive anonymised details of the career background of the independent adjudicator allocated to review your complaint.
52. Independent adjudicators do not undertake any other work for ISI.

Turn page: Our commitment to our complaints policy

Our commitment to our complaints policy

53. We recognise that senior leaders in the schools and education providers that we inspect have the right to raise concerns or complaints about our inspection work and should have access to clear information on how to raise complaints and concerns.

54. We will:

- make sure our inspection complaints policy is on our website
- investigate and respond to complaints about inspections of schools and education providers promptly within the scope and timescales of this policy
- deal with such complaints in line with our Data Protection Policy
- keep a register of all complaints about inspection, which the ISI Board will review regularly
- ensure all staff and Board members read, understand and comply with this policy and its procedures
- report annually to the DfE:
 - the number of formal complaints about inspections that we receive
 - the outcomes; and
 - any actions we take.

Turn page: Persistent or vexatious complaints

Persistent or vexatious complaints

55. The complaints procedure should be non-adversarial. It is expected that all involved in a complaint will conduct themselves respectfully and professionally.
56. Persistent or vexatious complaints cause stress to individuals and place undue strain on time and resources. ISI has a duty of care to its employees who manage complaints.
57. ISI will determine whether a complaint is persistent or vexatious on a case-by-case basis.
58. In assessing whether a complaint is persistent or vexatious, ISI will consider whether the complaint:
- is overly repetitious
 - pursues points that are outside the scope of this policy
 - expects unrealistic or unreasonable outcomes
 - pursues its points in an unreasonable manner
 - is intended to cause disruption and/or unreasonable delay to the inspection process and/or report publication
 - is persistent in not following the process outlined in this complaints policy.
59. We will inform you in writing if we consider that your complaint is persistent or vexatious with our reasons. If this is the case, we will inform you of how we will deal with your complaint, which may include our decision that we will not enter into any further communication with you concerning the complaint.

[Turn page:](#) Data protection

Data protection

- 60. We will only use the personal data you provide in order to process your complaint.
- 61. We may share information from your complaint with people whose actions you have complained about, relevant ISI staff who need it to do their job, an independent adjudicator, and/or external agencies as appropriate.
- 62. Apart from these exceptions, the complaints process is regarded as private and, as far as possible, we will maintain the privacy of anyone who makes or is referred to in a complaint.
- 63. We will retain data for six years following the date of closure of your complaint and then permanently delete data relating to your complaint.

Table of key changes

This separate BSO inspection complaints policy was introduced in November 2025.