

Independent Schools Inspectorate

Inspection Complaints Policy for ISI inspections for British Schools Overseas accreditation

September 2026

DATE OF POLICY:	September 2026
POLICY OWNER	Chief Inspector
APPROVED BY:	ISI Board and Department for Education
DATE OF NEXT REVIEW:	September 2027

Contents

Contents	2
Purpose	3
Scope of policy.....	3
Operation of this policy	4
Principles.....	5
Publication of report.....	6
Stage One - Informal resolution during inspection and/or immediately post-inspection.....	7
Stage Two – Written Complaint.....	8
Stage Three - Request for referral to independent adjudicator	10
Postponement of publication of the inspection report	10
Independent adjudicator review	11
Independent adjudicator response	11
Independent adjudicators	12
Our commitment to our complaints policy.....	13
Persistent or vexatious complaints	14
Data protection	15
Table of key changes	16

Purpose

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 and language schools ('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 an ISI inspection, and
 - how we will respond to complaints that we receive.
3. We will respond to complaints about our inspection work clearly, fairly and thoroughly.
4. We may treat communication with us as a complaint under this policy if we consider that this is the best way to respond to the content of that communication.
5. Throughout this policy 'us', 'we' and 'our' refer to ISI; 'you' and 'your' refer to the person making the complaint.

Scope of policy

6. This policy explains how we receive, review and respond to complaints about British Overseas School inspections in relation to:
 - inspector conduct as set out in our inspector code of conduct and/or
 - inspection processes as stated in our inspection handbook and/or
 - inspection evaluations in accordance with our inspection framework.
7. Complaints about inspector conduct and inspection processes may inform individual feedback and training as appropriate. Complaints about inspection evaluations will result in detailed review of the inspection evidence as part of the post-inspection quality assurance process.

8. Complaints about ISI's other inspection remits are considered under separate inspection complaints policies. To make a complaint about ISI's inspection work in other remits please refer to the separate ISI inspection complaints policies for Association School Inspections and the Inspection Complaints Policy for ISI's Student Educational Oversight Framework for Private Further Education Providers (including English language schools).
9. Complaints about ISI's non-inspection-related activities are 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.

Operation of this policy

10. The three-stage process outlined below allows for early informal review of issues immediately after the onsite inspection. Once the draft report is issued for factual accuracy checking, you may submit a stage two written complaint.
11. While the process does not provide an opportunity for you to submit further evidence, it does provide the opportunity for you to share your concerns regarding the basis of judgements reached on inspection.
12. Where complaints are raised about the judgements reached on an inspection, ISI will conduct a review of the evidence to ensure that sufficient evidence was gathered and evaluated in order to reach secure judgements.
13. We will only consider complaints about inspections from a person who is to be named on the published inspection report. This may be the headteacher, principal, chair of governors or proprietor.
14. You must follow the process outlined in this policy for the submission of a complaint. We reserve the right to treat any correspondence from a school following an inspection as a complaint under this policy. For the avoidance of doubt this does not mean that any such correspondence will be treated as a complaint
15. ISI will endeavour to remain within the deadlines set out in this policy wherever possible, but if circumstances indicate that this may not be possible, we will contact you with a revised deadline.

16. Throughout this policy, ‘term-time working days’ refers to the school’s term-time Monday to Friday working days. If, as a result of this definition, our response to your complaint and/or the publication of the inspection report would usually be delayed until the following autumn term, you will have the option of receiving our response to your complaint during the summer holiday. The complaints team at ISI will contact you via email to provide you with the option to receive the complaint response during the summer holiday. You will then need to confirm via return email to complaints@isi.net to accept or decline the option. If you choose to receive the complaint response, we will send this to you via email and we will issue your inspection report, but we will not usually publish the inspection report until the start of the autumn term.
17. All complaints received about the same inspection will be treated as one complaint.
18. We understand that issues may be raised that relate to the conduct of individuals. We request that any such complaints, while by their nature relate to individuals, are mindful of the potential impact on the individual and focus on the specific conduct issue that is being raised.

Principles

19. Clarity and accessibility: We will publish our policy in plain English, with clear time limits.
20. Fairness: We quality assure and moderate our processes and evaluations, reaching evidence-based decisions.
21. Learning: We use what we learn from complaints to inform training.
22. Balance: We identify and manage vexatious complaints and/or harmful behaviours to promote effective implementation of our complaints policy and to protect our staff.

Turn page: Publication of report

Publication of report

23. 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.
24. 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 will also be shared with the DfE.

Turn page: Stage One – Informal resolution during inspection and/or immediately post-inspection

Stage One - Informal resolution during inspection and/or immediately post-inspection

25. Our inspection handbook sets out what you should do if you want to raise an issue while the inspection team is on site. We encourage you to raise any issues or concerns during the onsite inspection either with the reporting inspector or by phoning ISI head office on 0207 600 0100.
26. If you feel the reporting inspector was unable to resolve an issue during the onsite inspection, you can request that the issues are reviewed as part of the post-inspection quality assurance process.
27. You must do this by submitting an [online request](#) for a video call within **four term-time working days** of the end of the onsite inspection.
28. We will schedule a video call with you. This video call will be between one person from the school, usually the headteacher, and one person from ISI.
29. At the stage one, informal stage we will confirm with you the focus of the quality assurance process as a result of any concerns raised, and the actions ISI will take in light of any concerns. We will do this during our video call with you. This may provide the opportunity to clarify any misunderstanding or to resolve matters quickly and informally.
30. For consistency in our policy and procedures we confirm that all calls will be video calls. This is to ensure a well-understood and fair approach for all schools.
31. The video call will not be recorded. ISI reserves the right to terminate the video call if it is deemed that the video call is being recorded.
32. Once the post-inspection review and quality assurance process is complete, we will arrange a follow-up video call when we will explain how we have considered the matters you raised.
33. We do not accept written submissions at this stage, and we will not respond in writing.

[Turn page:](#) Stage Two - Written Complaint

Stage Two – Written Complaint

34. If you wish to submit a written complaint, you must do so within **five term-time working days** of receiving the draft inspection report or inspection findings document, where BSO Standards are unmet. (please note that this is the same timeframe for the return of your factual accuracy check²).
35. If the scope of your complaint relates to evaluations reached, your complaint must clearly identify the paragraph(s) of the draft inspection report to which it relates, setting out a clear rationale for your complaint.
36. If you are making a written complaint about conduct or inspection process, you must clearly and succinctly set out your concerns.
37. You can make a written complaint whether or not you have previously raised the matter informally, but not until you have received the draft inspection report or inspection findings document. However, if you have previously raised the matter informally at stage one, you must set out how our informal response has failed to address your concerns.
38. To submit a written complaint, you must complete and submit this [online form](#). You are also required to submit the school's holiday dates for the current and following terms in the online form.
39. We will review your written complaint. In exceptional circumstances we may request a video call if we need to clarify your complaint. If we do request a video call, an anonymised transcript will be provided by us. A copy will also be retained by ISI.
40. If we request a video call with you this will be between one person from the school, usually the headteacher, and one person from ISI.
41. After the video call the stage two complaint reviewer will scope the matters raised in your complaint and begin their review. They will usually review the inspection evidence and contact

² The factual accuracy check (FAC) process is when we send you the draft inspection report for factual accuracy only. You must complete the factual accuracy check within five term-time working days of receiving the draft inspection report (see ISI Inspection Handbook).

the reporting inspector and /or team inspectors. The reviewer will consider the outcomes of the quality assurance process.

42. We will normally respond in writing to your written complaint within 15 term-time working days. If we think our response will take longer, we will write to you with a revised timescale.
43. If your written complaint is upheld or partially 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 action³.
44. We will send our responses under this policy to both the person who submitted the complaint and the proprietor of the school (if different). We may at our discretion copy to or send the proprietor any correspondence relating to the complaint.
45. We will usually issue you with the final report for publication or the inspection findings document at the same time as issuing the complaint response.
46. We usually publish the final report on our website **five term time working days** after we have issued it to you.

Turn page: Stage 3 - Request for referral to independent adjudicator

³ 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.

Stage Three - Request for referral to independent adjudicator

47. If you consider that we have not followed this policy in handling your complaint and/or our response to your complaint was unreasonable, you may request referral of our response to your complaint to an independent adjudicator for review.
48. You must request a referral to the independent adjudicator by completing and submitting the [online form](#) within **three term-time working days** of receiving our response to your written complaint.
49. You must set out briefly and clearly how you consider we have not followed this complaints policy and/or specific reasons why you consider our response to your complaint is unreasonable⁴.
50. We will send your request to an independent adjudicator. The adjudicator will consider your stated reasons for a request for adjudication as part of the stage three adjudication process and will, as part of the adjudication, evaluate whether you have demonstrated sufficient reason for the referral to adjudication.
51. As you will already have submitted a written complaint and we will have responded in writing, further evidence is not required and will not be considered by the independent adjudicator.
52. Please note that the independent adjudicator referral is not an opportunity to re-rehearse matters that have already been considered and answered by us, unless in doing so, we did not follow this policy and/or our response to your complaint was unreasonable.
53. ISI will send all relevant information and documentation relating to the complaint to the independent adjudicator.

Postponement of publication of the inspection report

54. Referral to the independent adjudicator for review does not automatically postpone the publication of the inspection report.

⁴ For the purposes of this policy, the definition of unreasonable is that known as Wednesbury unreasonableness. A reasoning or decision is Wednesbury unreasonable (or irrational) if it is so unreasonable that no reasonable person acting reasonably could have made it (*Associated Provincial Picture Houses Ltd v Wednesbury Corporation* (1948) 1 KB 223).

55. If you wish to request a postponement of publication of the inspection report pending the decision of the independent adjudicator you must, **within three term-time working days of issue to you of the final inspection report:**

- email the **Department for Education (DfE)** at registration.enquiries@education.gov.uk copying in complaints@isi.net
- providing the DfE with the reasons for your request
- stating the date when ISI issued the final report to you.

56. Subject to ISI being copied in via complaints@isi.net, we will not publish the inspection report until a decision on postponement of publication has been made by the DfE.

Independent adjudicator review

57. Following referral, the independent adjudicator will review whether:

- You have demonstrated sufficient reason for the referral;
- We followed this policy in handling your complaint; and/or
- Our decision making was unreasonable in response to your complaint.

Independent adjudicator response

58. The independent adjudicator will aim to complete their review within 20 term-time working days of its 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.

59. The independent adjudicator will send their draft response to ISI. If we consider that any part of the independent adjudicator's response goes beyond the scope of this policy and/or has factual inaccuracies, we will inform the independent adjudicator within two term-time working days with clear rationale for our view relating to scope and/or factual inaccuracy and required change(s). We do not otherwise comment on the conclusions and/or any recommendations drawn by the independent adjudicator.

60. Following our response to the independent adjudicator, within three term-time working days you will receive the final review outcome directly from the independent adjudicator and it will be sent to ISI at the same time.

61. If the independent adjudicator finds that we did not follow this complaints policy and/or reached an unreasonable decision in response to your complaint, the independent adjudicator will tell you why and may refer the complaint back to ISI for reconsideration. We will write to you to outline the steps ISI may take as a result within five term-time working days of receiving the review from the independent adjudicator.
62. If the inspection report has not already been published and the independent adjudicator does not refer it to ISI for consideration, we will publish the report on the ISI website five term-time working days after receipt of the review from the independent adjudicator. Where BSO Standards are not met, we will send the inspection findings document to the headteacher.
63. The decision of the independent adjudicator is final and concludes the complaints process. ISI will not engage in further correspondence after the complaints process has been concluded.

Independent adjudicators

64. ISI has a pool of independent adjudicators who are appointed by the ISI Board. ISI independent adjudicators are recruited by the ISI Board 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.
65. You will be sent in confidence and for information only, the name and a brief biography of the independent adjudicator allocated to review our response to your complaint. You or your representatives are not permitted to contact the independent adjudicator directly. Should you do so, we reserve the right to consider your complaint as discontinued.
66. Independent adjudicators do not undertake any other work for ISI.

[Turn page:](#) Our commitment to our complaints policy

Our commitment to our complaints policy

67. 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.

68. 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

69. The complaints procedure should be non-adversarial. It is expected that all involved in a complaint will conduct themselves respectfully and professionally.

70. Persistent or vexatious complaints cause stress to individuals and place undue strain on time and resources. We have a duty of care to our employees who manage complaints.

71. We will determine whether a complaint is persistent or vexatious on a case-by-case basis.

72. 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.

73. Repeated communication by the complainant with us either by email or other means while the complaints process is underway may be deemed vexatious or persistent.

74. 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

75. We will only use the personal data you provide in order to process your complaint.
76. 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.
77. 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.
78. We will retain data for six years following the date of closure of your complaint and then permanently delete data relating to your complaint.

[Turn page:](#) **Table of key changes**

Table of key changes

79. This separate Inspection Complaints Policy for British Schools Overseas was introduced in November 2025.

80. Following the consultation on proposed revisions to ISI's Inspection Complaints Policy for Association School Inspections the revisions in this policy for September 2026, align with changes made as a result of the consultation outcome.

Cover sheet	Updated with start and new review dates.
Paragraph 11	Inserted new text in relation to not permitting additional evidence as part of a complaint.
Paragraph 16	Explains new procedure for complainants to have the option of receiving their complaint response during the summer holiday and how this occurs.
Paragraphs 19-22	New section setting out four key principles they underpin this policy.
Paragraphs 27 - 31	Explains new procedures for scheduling a video call with complainant upon receipt of the online request form. Explains how ISI will use the video call to understand the complainants concerns at the end of the stage one review confirms that ISI will schedule a video follow up call to explain how ISI has considered the concern matters raised.
Paragraphs 39 - 40	New paragraphs which explain new procedures for scheduling a video call with complainant if ISI deem this is necessary in exceptional circumstances. Explains that an anonymised transcript will be sent to the complainant and a copy will be retained by ISI also. Confirms that the video call will be with one person from the school, usually the headteacher and one person from ISI.
Paragraph 42	Revised timescale of 15 term-time working days to respond to the stage two complaint.
Paragraphs 49 - 50	Explains how the complainant needs to set out the reasons for the referral to the independent adjudicator and why ISI has not followed the complaints policy and all the complainant considers the stage two response is unreasonable.
Paragraphs 52	Clarifies that the referral to adjudication is not an opportunity to re-rehearse matters that have already been considered and answered by ISI, unless in doing so, ISI did not follow this policy and/or our response to your complaint was unreasonable.
Paragraph 53	Explains that ISI will send all information and documentation relating to the complaint to the adjudicator.
Paragraph 65	Confirms that the complainant will receive the name and brief biography of the independent adjudicator allocated to the stage three complaint. Confirms that complainants must not contact the independent adjudicator. If complainants contact the independent adjudicator ISI reserves the right to consider the complaint as discontinued.