

Independent Schools Inspectorate

Non-Inspection Complaints Policy

September 2026

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Introduction

1. The Independent Schools Inspectorate ('ISI') is an independent inspectorate, appointed by the Department for Education ('DfE') to inspect Association Independent Schools in England. We are also approved by the DfE to inspect British Schools Overseas ('BSO'), and by the Home Office to inspect Private Further Education Colleges and language schools ('PFE').
2. 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.
3. The aim of this policy is to ensure that you know how to make a complaint about ISI's non-inspection work and understand how we will handle complaints that we receive. 'ISI's non-inspection work' for the purpose of this policy means interactions with or work done by ISI not directly related to an inspection.
4. A complaint about an ISI inspection will be considered under the remit specific inspection complaints policy as follows:
 - Inspection Complaints Policy for Association School Inspections (September 2026)
 - Inspection Complaints Policy for British Schools Overseas accreditation (September 2026)
 - Inspection Complaints Policy for Student Educational Oversight Inspections of Private Further Education Colleges and Language Schools (September 2026).
5. We take seriously any complaint we receive and will respond to it in accordance with the relevant policy. We will respond to complaints about our work clearly, fairly and thoroughly.
6. Throughout this policy 'us', 'we' and 'our' refer to ISI; 'you' and 'your' refer to someone who has a concern or is making a complaint.
7. 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.

8. If your complaint is upheld, we will acknowledge this and our response will depend on the circumstances. It may include an explanation, acknowledgement of responsibility, apology and/or remedial action¹.
9. If you make more than one complaint about the same matter, we will treat them as one complaint.
10. The three-stage process outlined below allows for stage one informal resolution of concerns raised with us and how a complainant may progress a complaint to stage two written complaint and to final stage three, referral to independent adjudication.

[Turn page:](#) **Stage One**

¹ 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 One - Informal resolution

11. Please email us at complaints@isi.net briefly summarising your complaint. The ISI complaints team will acknowledge receipt of your complaint and ask you to let us know the best phone number to call you on. Where applicable, ISI may request that the call is conducted as a video call and we will coordinate this with you.
12. You must:
 - make your complaint within two months of the work or matter in respect of which you are complaining. If a matter has come to your attention more than two months after it occurred, please explain the circumstances and state when it came to your attention;
 - explain how your complaint relates to ISI's non-inspection work.
13. We can only consider complaints that relate directly to the work that we do.
14. If your complaint does not relate to the work that we do, we will, if possible, direct you to another body that may be able to help you.
15. If your complaint does relate to work that we do, we will aim to call you within five working days to listen to your complaint.
16. We will try to resolve your complaint at this informal stage within 15 working days of its receipt and will let you know if it will take longer than this to respond to you. We will usually respond to you by phone or video call as applicable, but we may respond by email.

Turn page: Stage Two

Stage Two - Written Complaint

17. If the stage one informal resolution process does not resolve your concern, you can make a formal complaint by emailing complaints@isi.net to request a stage two non-inspection complaint form.
18. If you have previously raised an informal complaint with ISI, you must complete and return the stage two non-inspection complaint form to ISI within ten working days of our response to your stage one complaint.
19. If you have not previously made an informal stage one complaint, you must submit your stage two complaint within two months of the work or matter in respect of which you are complaining. If a matter has come to your attention more than two months after it occurred, please explain the circumstances and state when it came to your attention.
20. The stage two formal non-inspection complaint form will ask you to record:
 - The nature of the complaint;
 - The resolution that you seek;
 - If you made a stage one informal complaint, why you feel this was not resolved;
 - Any outstanding issues.
21. We will acknowledge your formal stage two complaint within five working days of receipt.
22. We will review your written complaint. In exceptional circumstances we may request a call or 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.
23. If we request a video call, it will be with the complainant and one person from ISI.
24. We will investigate your complaint, and we will respond in writing usually within fifteen working days. We will explain whether part, all or none of your complaint has been upheld. We will also tell you any steps we will take as a result.

25. Occasionally, our review of your complaint may take longer. If this is the case, we will write to you to amend the timeline for our response to you.

[Turn page:](#) **Stage Three**

Stage Three - Request for referral to independent adjudicator

26. If you consider that we have not followed this policy in handling your complaint and/or our response to your stage two complaint was unreasonable, you may request referral of our response to your complaint to an independent adjudicator for review via complaints@isi.net within ten working days of receiving it.
27. We will acknowledge your referral to the independent adjudicator within five working days of receiving it.
28. 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 unreasonable².
29. 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.
30. The adjudicator will receive copies of your stage two complaint and our response to you. Further information is not required and will not be considered by the independent adjudicator.
31. 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.
32. ISI will send all relevant information and documentation relating to the complaint to the independent adjudicator.

Independent adjudicator review

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

² 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*).

- 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

34. The independent adjudicator will aim to complete their review within 20 working days of its referral, subject to the availability of an independent adjudicator. If this is not possible, we will let you know the revised timeframe.
35. The independent adjudicator will send their draft complaint 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 working days, with a clear rationale for our view relating to the scope and/or factual accuracy of the response along with any suggested amendments.
36. We do not otherwise comment on the conclusions and/or any recommendations drawn by the independent adjudicator.
37. The decision of the independent adjudicator is final. We are not able to engage in further correspondence after the complaints process has been concluded.
38. There is no further right of appeal under this policy. If you have been through all stages of the process and you are still not satisfied, you might consider approaching:
 - Citizens' Advice
 - A solicitor.

Independent adjudicators

39. 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 relevant knowledge, skills and experience. ISI publishes information about the recruitment process and person specification for the independent adjudicator role on the ISI website.

40. 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.
41. Independent adjudicators do not undertake any other work for ISI.

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

Our commitment to our Non-Inspection Complaints Policy

42. We recognise that all service users, agencies and organisations that we work with directly have the right to raise concerns or complaints about our non-inspection work and should have access to clear information on how to voice complaints and concerns.

43. We will:

- make sure that our Non-Inspection Complaints Policy is published on our website
- investigate and respond to complaints about our non-inspection work promptly within the scope and timescales in this policy
- deal with complaints in line with our Data Protection Policy
- keep a register of all non-inspection complaints, which the ISI Board will review regularly
- ensure all contractors, employees and Board members read, understand and comply with this policy and its procedures
- report annually to the ISI Board via the Board's Assurance Committee:
 - the number of formal non-inspection complaints we receive
 - the outcomes; and
 - any actions we take.

[Turn page:](#) **Persistent or vexatious complaints**

Persistent or vexatious complaints

44. The complaints procedure should be non-adversarial. It is expected that all involved in a complaint will conduct themselves respectfully and professionally.
45. 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.
46. We will determine whether a complaint is persistent or vexatious on a case-by-case basis.
47. In assessing whether a complaint is persistent or vexatious, we 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.
48. 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.
49. 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

50. We will only use the personal data you provide in order to process your complaint.
51. 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.
52. 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.
53. 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

The following key changes were made to ISI's Non-Inspection Complaints Policy for September 2026:

Front cover	Updated review date
Paragraph 4	Inserted the reference to the three new remit specific ISI inspection complaints policies.
Paragraph 10	New paragraph inserted referring to three stages in this policy which now align to the three stages in the inspection complaints policies.
Paragraph 11	Revised stage one informal process. Introduction that where applicable, ISI may request that the stage one call is conducted as a video call and that ISI will coordinate this with the complainant.
Paragraph 16	New paragraph stating that at the end of the stage one complaint process ISI will usually respond to the complainant by phone or video call as applicable, but we may also respond by email.
Paragraph 22	New paragraph confirming that ISI will review the submitted written complaint and in exceptional circumstances ISI might request a call or video call with the complainant if ISI need to clarify your complaint. If ISI does request a video call, an anonymised transcript will be provided by us. A copy will also be retained by ISI.
Paragraph 23	New paragraph confirming that if ISI request a video call, it will be with the complainant and one person from ISI.
Paragraph 28	New paragraph which confirms that the complainant must set out briefly and clearly why they consider that ISI has not followed this complaints policy and/or specific reasons why they consider our response to their complaint is unreasonable.
Paragraph 29	New paragraph confirming that ISI will send the request for referral to an independent adjudicator and that the adjudicator will consider the complainant's reasons stated in the request for adjudication as part of the stage three adjudication process. The adjudicator will evaluate whether the complainant has demonstrated sufficient reason for the referral to adjudication.
Paragraph 30	New paragraph stating that further evidence is not required and will not be considered by the independent adjudicator.
Paragraph 31	New paragraph reiterating that referral of a complaint to the independent adjudicator is not an opportunity to re-rehearse matters that have already been considered and answered by us, unless in doing so, ISI did not follow this policy and/or our response to the complaint at stage two was unreasonable.
Paragraph 40	Updated to confirm that a complainant will receive the name and short 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.
Paragraph 41	Confirmed that independent adjudicators do not undertake any other work for ISI.
Paragraph 43	Inserted that ISI report annually to the ISI Board via the Board's Assurance Committee about: the number of formal non-inspection complaints ISI receives; the outcomes; and any actions we take.