

Independent Schools Inspectorate

Inspection Complaints Policy for ISI's student educational oversight inspections of private further education colleges and language schools.

September 2026

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

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Purpose

1. The aim of this policy is to ensure that principals of private further education colleges and language schools that we inspect know:
 - how to make a complaint about an ISI inspection, and
 - how we will respond to complaints that we receive.
2. We will respond to complaints about our inspection work clearly, fairly and thoroughly.
3. 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.
4. Throughout this policy 'us', 'we' and 'our' refer to ISI; 'you' and 'your' refer to the person making the complaint.

Scope of policy

5. The policy is effective from 1 September 2026.
6. ISI conducted a consultation about changes to its framework for conducting educational oversight inspections of private further education colleges and language schools. The consultation ran from 26 January 2026 to 23 March 2026. The new framework for these oversight inspections is effective from 1 September 2026.
7. This complaints policy has been developed to align with the outcome of ISI's consultation on proposed revisions to ISI's Inspection Complaints Policy for Association School Inspections. The policy aligns with the introduction of the revised framework for conducting educational oversight inspections of private further education colleges and language schools.
8. This policy aligns with our inspection complaints policies for:
 - Inspection Complaints Policy for Association School Inspections
 - Inspection Complaints Policy for British Schools Overseas Inspections.
9. This policy explains how we receive, review and respond to complaints about an educational oversight inspection of private further education colleges and language schools, 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.

10. 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 including as part of the post-inspection quality assurance process.

Operation of this policy

11. 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.
12. 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.
13. 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.
14. We will only consider complaints about inspections from a person who is to be named on the published inspection report. This may be the principal, chair of governors or proprietor.
15. 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 private further education college or language 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.
16. 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.
17. Throughout this policy, 'term-time working days' refers to the college'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, if applicable. 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, if applicable. 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 or send it to the Home Office until the start of the autumn term.
18. All complaints received about the same inspection will be treated as one complaint.
19. 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

- 20. Clarity and accessibility: We will publish our policy in plain English, with clear time limits.
- 21. Fairness: We quality assure and moderate our processes and evaluations, reaching evidence-based decisions.
- 22. Learning: We use what we learn from complaints to inform training.
- 23. 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:](#) **Stage One**

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

24. 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 lead inspector or by phoning ISI head office on 0207 600 0100.
25. If you feel the lead 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.
26. 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.
27. We will schedule a video call with you. This video call will be between one person from the college, usually the principal, and one person from ISI.
28. 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.
29. 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 private further education colleges and languages schools.
30. 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.
31. Once the post-inspection review and quality assurance process is complete and before we send you the draft inspection report, we will arrange a follow-up video call when we will explain how we have considered the matters you raised.
32. We do not accept written submissions at this stage, and we will not respond in writing.

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

Stage Two – Written complaint

33. If you wish to submit a written complaint, you must do so within **five term-time working days** of receiving the draft inspection report (please note that this is the same timeframe for the return of your factual accuracy check¹). The draft inspection report will usually be sent to you ten days after completion of the onsite inspection.
34. 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.
35. If you are making a written complaint about conduct or inspection process, you must clearly and succinctly set out your concerns.
36. 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. 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.
37. To submit a written complaint, you must complete and submit this [online form](#). You are also required to submit the college's holiday dates for the current and following term.
38. 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 anonymous transcript will be provided by us. A copy will also be retained by ISI.
39. If we request a video call with you this will be between one person from the college, usually the principal, and one person from ISI.
40. 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 the lead inspector and/or team inspectors. The reviewer will consider the outcomes of the quality assurance process.
41. 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.
42. 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 action².

¹ 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).

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.

43. We will send our responses under this policy to both the person who submitted the complaint and the proprietor of the college or language school (if different). We may at our discretion copy to or send the proprietor any correspondence relating to the complaint.
44. We will usually issue you with the final report for publication at the same time as issuing the complaint response.
45. We usually publish the final report on our website and send it to the Home Office **five term time working days** after we have issued it to you.

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Stage Three - Request for referral to independent adjudicator

46. 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.
47. 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.
48. 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 unreasonable³.
49. 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.
50. 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.
51. 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.
52. ISI will send all relevant information and documentation relating to the complaint to the independent adjudicator.

Postponement of publication of the inspection report

53. Referral to the independent adjudicator for review does not automatically postpone the publication of the inspection report.
54. If you wish to request a postponement of publication of the 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 complaints@isi.net and provide ISI with the reasons for your request
 - stating the date when ISI issued the final report to you.

³ 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. Subject to ISI reviewing reasons for your request and approving postponement, we will not publish the inspection report, and we will postpone publication and issue to the Home Office until completion of the adjudication.

Independent adjudicator review

56. 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

57. 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.

58. 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.

59. 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.

60. 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.

61. 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 and send it to the Home Office five term-time working days after receipt of the review from the independent adjudicator.

62. 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

63. 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.
64. 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.
65. Independent adjudicators do not undertake any other work for ISI.

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

Our commitment to our complaints policy

66. We recognise that senior leaders in colleges 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.

67. We will:

- make sure our inspection complaints policy is on our website
- investigate and respond to complaints about inspections of private further education colleges and language schools promptly within the scope and timescales of this policy
- ensure there is an internal review process using members of the inspectorate who were not involved in the original inspection
- deal with such complaints in line with our Data Protection Policy
- keep a register of all complaints about inspections, 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 ISI Board via the Board's Assurance Committee:
 - 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

68. The complaints procedure should be non-adversarial. It is expected that all involved in a complaint will conduct themselves respectfully and professionally.
69. 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.
70. We will determine whether a complaint is persistent or vexatious on a case-by-case basis.
71. 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.
72. 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.
73. 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

- 74. We will only use the personal data you provide in order to process your complaint.
- 75. 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.
- 76. 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.
- 77. 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

This is the Inspection Complaints Policy for ISI's Student educational oversight inspections of private further education colleges and language schools, September 2026.

Version date	Page and paragraph	Change
September 2026	n/a	New policy