



**MIAP**  
Managing Information  
Across Partners

**Learner Registration Service –  
Dealing with Learner Enquiries, Complaints &  
Appeals**  
Version 2

**November 2009**



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## 1. Introduction

### 1.1 Purpose

To give guidance to the Learner Registration Bodies (LRBs) on how to deal with enquiries, complaints or appeals from learners who have a ULN. To explain the typical type of enquiries that LRBs can receive from a registered learner.

### 1.2 Audience

This document is intended for organisations that are registered on the Learner Registration Service (LRS) and the LRS users within that organisation who deal with learners.

### 1.3 Scope

This document is not intended to describe the functions of the LRS. This document only covers guidance on dealing with learner's LRS related enquiries, and how to handle complaints or appeals to MIAP. This document does not address issues that the learner has within your own organisation. It is recognised that every organisation will have different procedures and policies for dealing with learner enquiries, complaints and appeals. This document is only intended to inform and not to replace any policies in your organisation.

### 1.4 Glossary

Before you start reading this document a couple of key terms to understand:

**ULN Register Record** - is the basic details of the student, and only covers the student's name, address, and other basic details.

**Personal Learning Record** - to be introduced later, this will give a comprehensive report of the basic details and details of the qualifications and learning participations for the learner.

## 2. Learner Identification

As an LRB you can deal with most of your learner's enquiries yourself without the need to refer the learner to the MIAP help desk. The MIAP help desk is primarily intended to support you the LRB and not the learner. In the future a new learner or public facing support line will be provided to deal with some learner enquiries.

Before you can answer any question from a student or parent/guardian about a ULN you must make sure that staff only gives details to individuals who have verified themselves as the learner or proven their relationship to the learner. You must also make sure that only staff in suitable roles can access learner data on the LRS (refer to **Managing Your Users guide** for further details). These basic principles are written down in the **MIAP LRS Organisation Agreement** as part of your responsibilities in using the service.

In handling enquiries for ULN records and processing changes you must find out what are the rights of the person making any request. A parent or guardian may have rights to act for the student. However in some cases this may not be the case, for example when the student is old enough to make their own decisions, or where a parent is divorced and no longer has contact with the student. You also have to consider that age is not the only reason used in determining if the student is capable to make their own decisions. For example a special needs student over 18 years old may be less capable to give their own consent than a student aged 14 years old.

The Children Act 1989 says that the needs of the child are paramount, but also recognises the rights of parents/guardians. It is assumed therefore that organisations already dealing with students and their parents/guardians already have set up policy & procedures for updating the records of students to cover these situations and who can be given details.

It is assumed that your policy will cover the acceptable forms of verification for verifying identity before answering questions or making changes.

Generally your procedures for updating your own student records will equally apply to MIAP LRS and the student's ULN Register Record. If you don't have any policy or procedures for updating the records of students then it is vital that you set up one. In addition to your existing procedures you may want to consider adding one new item to the list of acceptable forms of verification: The ULN. If an individual provides their ULN plus one form of identification containing their name and date of birth this will be satisfactory evidence to confirm identity for LRS.

**Key points:**

- 1. Make sure you have an adequate policy and procedures covering the access to the students records.**
- 2. Make sure you have rules covering who can provide you with updates.**
- 3. Apply this policy to all enquiries relating to MIAP LRS.**

### **3. Learner Enquiries**

Having found out the identity and rights of the person enquiring about a ULN Register Record, then the sorts of enquiries you can receive include:

#### **3.1 What is my ULN? Or (Do I have a ULN?)**

This is a typical search for the learner by demographic information. In doing a search you need to consider many things such as; previous family name (if the person has remarried or parent has remarried), previous address (if moved recently). For more tips on searching refer to **Searching For Learners** guidelines.

Your organisation's policy should cover the confidentiality of records about the learner.

**4. You should not be searching for another learner's details for someone outside of your organisation if they are not the learner or the learner's parents or guardian.**

#### **3.2 Disclosing Details**

If a learner/parent/guardian asks you to show what your organisation holds about them this **does not** include the MIAP LRS. Follow your own procedures for data disclosure for your organisation records.

A learner may ask you directly for details of what their ULN Register Record and/or their Personal Learning Record contain. Therefore if the request is a general one and the learner has a populated Personal Learning Record, you can give details by printing this off, provided this is not breaking any confidentiality. MIAP will mark the it as 'PRIVATE – PROTECT' in line with Skills Funding Agency policy.

Where a learner has no details in their Personal Learning Record then you can still print it off to show them this.

If a person wants to make a formal requests for data disclosure on MIAP LRS please refer the learner to make an application in writing to

The Skills Funding Agency or contact the MIAP Help Desk for further guidance on this process.

### **3.3 Updating a Student's ULN Details**

As an LRB you are able to update the majority of the details on a student's ULN Register Record. Details can be updated either by the portal or by batch.

It is possible to update any fields on the portal as long as the information verified first.

If using the batch process, please note the updates to the ULN Register Record will only occur as follows:

1. The five mandatory fields (Given Name, Family Name, Date of Birth, Gender or Last Known postcode), will only be updated if the Verification Type value is set to a value higher than 0 = none provided.
2. If updating Given Name or Family Name, the above applies as well as the name needing to match the database value on a fuzzy or pseudonym name. In reality this could mean only very minor changes to these names will happen.
3. If updating the Address fields the five mandatory fields must match as explained in point 1 but an update will only be performed if at least 1 of the 4 address fields supplied in the batch file is completed. EG your file contains details in the Address Line 1 and Postcode but not in Address Line 2, Town, County then the address fields will be updated as County.
4. The Verification fields will be updated as a group with the values in the batch file whether the same as the LRS or not.
5. The batch file field contains a value and the corresponding LRS field is blank.
6. If Ability to Share field has previously been set by the learner then this cannot be reset by any values in the batch file. Similarly, it cannot be updated to "0 = FPN Not Seen" if the field was previously set to one of the "FPN Seen" values.

**5. Updates can be performed by the portal or by batch submission but only if certain conditions are met. Please ensure updates are only performed once evidence has been seen.**

There are two types of changes to the ULN Register Record that can be made.

1. Changes that need evidence verification, this includes:
  - Name
  - Previous family name or Family name at 16
  - Address
  - Date of Birth
  - Gender
  
2. Changes needing only proof of identity or the person's right to change, this includes:
  - Email address
  - School at age 16
  - Nationality
  - Scottish Candidate number
  - Verification type
  - Preferred Given Name

If a change needs documentary proof then please follow your own internal policy and procedures to make sure that the changes are correctly verified. Again this is a requirement written down in the MIAP LRS Organisation agreement as part of your responsibilities. For MIAP's own recommendations for documentary evidence for change then refer to the **Verification Guidelines**.

### 3.4 Consent Status

LRS works on an Opt out basis, or to put it another way; LRS assumes a learner has consented to share their details with schools and colleges etc (LRBs) unless they choose not to. This principle is included within the Fair Processing Notice (FPN)/Privacy Notice given to all students.

If your student has not got a ULN it is recommended that you provide an FPN/Privacy Notice to them. If a ULN has been found for the student then the decision to provide an FPN/Privacy Notice depends on the "Ability to Share" flag on their ULN record. If the Ability to share is "FPN not seen" for that learner it is recommended that you provide the FPN/Privacy Notice and provided that the student does not wish to opt out then update the Ability to share for the learner to "FPN seen and able to share data".

If the learner Ability to Share is "FPN seen and unable to share data" or "FPN seen and able to share data" then you do not need to provide the student with an FPN/Privacy Notice. When a learner wants to opt out (setting Ability to Share to "FPN Seen and unable to share data"), make sure that the learner understands what this means before making any changes.

Opting out does not remove the person from the LRS. The ULN is mandatory and cannot be opted out. Opting out only prevents schools and colleges etc (such as you) from seeing the person's qualification data and their records of study – their Personal Learning Record. This may slow down any future enrolment or qualification award.

If the learner still wishes to proceed then you can simply update the 'Ability to Share' field on the learner details. If a learner has previously opted out and wants to change this then you should explain that the reverse (of the above) is true. Please note that if the learner has access to their Learner Account and has set the Ability to Share field themselves, you will not be able to update this field. The Learner can therefore amend this field themselves or contact the LRS Help Desk in order for them to perform the update.

**6. Make sure that the person understands what opting out means. Opting out does not mean a learner will not get a ULN.**

### 3.6 Data Challenge

A learner's query may be about data quality of their ULN Register Record or their Personal Learning Record, this is classified by LRS as a Data challenge.

What is a Data Challenge? This is when a learner (or LRB user) identifies an issue with a ULN Register Record or a Personal Learning Record.

If the complaint is about the data content of the ULN Register Record, before you decide to update the record make sure that they are using the right ULN. It may be that the ULN is not their ULN Register Record and they may be sharing the ULN with another person or that they have a second ULN.

If the complaint is that they have the wrong ULN again make sure there are no similar records for the person within the LRS. Please refer to the Searching For Learners guide for more information on refining your search.

If the complaint is that they have been given another ULN and it appears that they have a duplicate ULN then you must verify that the two ULN records are in fact a duplicate and not just two similar people before declaring as a duplicate. You must decide which ULN Register Record is the right record (in your judgement) and this will become the master ULN. The other ULN Register Record will become a 'slave' record. If you cannot decide which is correct then MIAP's advice is that the oldest created ULN Register Record is made the master (or main) record.

Once a master record is selected make sure that your own MIS is updated to use the master ULN. All of these data challenge scenarios are covered by the **Data Challenge Tool**. This tool will lead you through a series of questions to validate the nature of the data challenge. If the data challenge is proven, the tool will give you a Data Challenge Form with the reason for the challenge already filled in. All you need to do is fill in the rest of the form and send to the MIAP Help Desk to address.

If the complaint is about a missing Learning Event or a Learning Event appears more than once or a Learning Event does not belong to a learner, ensure you collect all relevant information and use the Data Challenge Tool which will provide you with the correct Data Challenge Form.

If you do not wish to use the Data Challenge Tool, you can raise the data challenge in the LRS portal using the Report a ULN problem button which can be found through a Learner's Personal Learning Record. Once a learner has a User Account, they too can raise data challenges themselves using the same button.

Just follow the on-screen instructions to complete and submit the data challenge.

## **7. Use the Data Challenge Tool to qualify any data challenge.**

Learner Record and Learner Plan data challenge is not yet covered.

### **3.7 Deceased Learner**

In the unfortunate situation where a learner is reported to you as being deceased then it is your responsibility to validate this claim is correct. MIAP does not insist on documentary evidence such as death certification. MIAP assumes that your organisation policy and procedures cover this eventuality when updating your own student records. If your policy and procedures do not cover this eventuality then it is vital you amend them to cover deceased notifications. These procedures must also be applied to MIAP LRS. If death is being reported then please use the Data Challenge Tool which will guide you in creating a relevant Data challenge Form with the right reason. Finish completing the form and send to the MIAP Help Desk who will make sure that the learner's ULN is marked as deceased.

## **8. Make sure you have ratified any deceased claims before informing MIAP.**

### **3.8 Obtaining a User Account**

A Learner's/parent's/guardian's question might centre around getting access to their own Personal Learning Record.

A User Account will give the learner/parent/guardian direct access via the internet to their Personal Learning Record. A learner User Account is accessed using their ULN and a password known only to the learner/parent/guardian.

How does a learner get access to MIAP and my record?

At this stage not all learners can logon to MIAP and access their Personal Learning Record. The Personal Learning Record is being rolled out from November 2009 and should your organisation wish to participate, please express your interest by contacting the MIAP Help Desk.

## **4. Complaints**

If you receive a complaint from a learner/parent/guardian firstly follow your own organisation's complaints procedure.

If you identify that the complaint relates to their ULN or the service given by MIAP then they should refer to the **MIAP Complaints and Appeals Guide**. If the complaint is about their ULN then please refer to the Data challenge section.

## **5. Appeals**

A learner/parent/guardian can appeal decisions made by MIAP or your organisation.

If a person appeals your organisations decision not to make a change within MIAP LRS (for example if your internal policy on parental rights prevents a change being accepted) then you must follow your own internal appeal procedures.

If you receive an appeal from a learner/parent/guardian that relates to a problem with their ULN then refer to 3.5 Data Challenge. However a person cannot appeal against having a ULN Register Record.



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Publication code: **USR18 Version 2**