



ESTAR

ELITE SKILLS, TRAINING
& RECRUITMENT

CP-012

**Learner Identification
Policy and Procedure**

REV: 00



Policy owner: Head of Quality & Compliance

Operational leads: MIS / Data Lead, Programme Managers, Admissions & Enrolment Team

Applies to: All learners and apprentices on ESTAR programmes (funded and non-funded)

Systems referenced: Learner Records Service (LRS – DfE)

Review cycle: Annual, or following changes to DfE, ESFA or funding rules

Version: 00

1. Purpose

ESTAR Education is committed to ensuring that **all learners are accurately identified, verified and recorded** to support:

- correct learner registration and enrolment;
- accurate funding, reporting and audit compliance;
- assessment and certification integrity; and
- protection against fraud, error or duplication.

This policy sets out how ESTAR verifies learner identity and manages learner records, including the use of the **Department for Education (DfE) Learner Records Service (LRS)**.

2. Scope

This policy applies to:

- all learners and apprentices enrolled on ESTAR programmes;
- all funded provision (including ESFA-funded apprenticeships and adult skills);
- non-funded learners where identification is required for assessment or certification.

It covers:

- initial identity verification;
- Unique Learner Number (ULN) checks and creation;
- use of the LRS system;
- ongoing verification and record accuracy.

3. Principles

ESTAR's learner identification process is based on the following principles:

- **Accuracy** – learner identity and data must be correct and consistent;
- **Consistency** – the same standards apply across all programmes;
- **Compliance** – alignment with DfE, ESFA and awarding organisation requirements;
- **Security** – personal data is protected at all stages;
- **Auditability** – records are clear, traceable and inspectable.

4. Legal and regulatory context

Learner identification and record management aligns with:

- ESFA funding and audit requirements;
- awarding organisation and EPAO registration rules;
- UK GDPR and Data Protection Act 2018;
- DfE requirements for the **Learner Records Service (LRS)**.

The LRS is the national database that:

- assigns and manages **Unique Learner Numbers (ULNs)**; and



- holds verified learner identity data used across the education and skills system.

5. Roles and responsibilities

5.1 Head of Quality & Compliance

- Overall accountability for learner identification compliance.
- Ensures procedures align with funding and audit requirements.
- Oversees corrective action where errors are identified.

5.2 MIS / Data Lead

- Manages access to and use of the LRS.
- Ensures ULN checks are completed correctly.
- Maintains accurate learner data across systems.
- Resolves data mismatches or duplication.

5.3 Admissions / Enrolment Team

- Collects learner identity evidence at enrolment.
- Verifies learner details prior to registration.
- Ensures required documentation is complete and valid.

5.4 Tutors / Programme Managers

- Confirm learner identity at induction.
- Flag discrepancies or concerns promptly.

6. Learner identity verification

6.1 Required identification

At enrolment, learners must provide **valid identification**, which may include:

- passport;
- driving licence;
- birth certificate (with supporting evidence);
- other official photo ID where appropriate.

Where learners are unable to provide standard ID, alternative evidence may be accepted following senior review and recorded justification.

6.2 Identity checks

ESTAR will:

- verify that the learner matches the identification provided;
- ensure names, dates of birth and personal details are consistent;
- confirm the learner is the individual undertaking the programme.

Identity checks are recorded as part of the enrolment record.

7. Use of the Learner Records Service (LRS)

7.1 Purpose of LRS checks

ESTAR uses the **DfE Learner Records Service (LRS)** to:

- check whether a learner already has a **Unique Learner Number (ULN)**;
- verify existing learner identity details;
- create a new ULN where one does not exist; and
- ensure consistency of learner records across providers and systems.



7.2 ULN verification process

For all funded learners (and others where required):

1. Learner details are checked against the LRS using:
 - full legal name;
 - date of birth;
 - gender (where applicable);
 - postcode or previous learning data (where required).
2. If a ULN exists, ESTAR:
 - confirms the learner's identity matches LRS records;
 - uses the existing ULN across all systems.
3. If no ULN exists, ESTAR:
 - creates a new ULN via the LRS;
 - ensures details are accurate before submission.

7.3 Data accuracy and corrections

Where discrepancies are identified:

- ESTAR investigates the cause;
- corrections are made through the LRS where appropriate;
- changes are documented and auditable.

Duplicate ULNs or incorrect identity records are escalated to the MIS / Data Lead for resolution.

8. Ongoing identity assurance

ESTAR will:

- reconfirm learner identity at induction and key assessment points;
- ensure the learner presenting for assessment is the registered individual;
- apply additional checks for examinations, controlled assessments or EPA preparation where required.

9. Fraud prevention and irregularities

ESTAR takes learner identity fraud seriously. Any concerns relating to:

- impersonation;
- false identity;
- duplicate or misleading records;

will be:

- investigated immediately;
- reported internally under the **Malpractice and Maladministration Policy**; and
- escalated to awarding organisations or funders where required.

10. Data protection and confidentiality

All learner identification data is:

- processed lawfully and securely;
- accessed only by authorised staff;
- stored in line with ESTAR's **Data Protection Policy** and **Document Retention and Secure Storage Policy**.



11. Record keeping and audit

ESTAR maintains auditable records of:

- identity verification checks;
- ULN confirmation or creation;
- LRS search and update activity;
- actions taken to resolve discrepancies.

These records are available for:

- ESFA funding audits;
- awarding organisation/EPAO reviews;
- Ofsted inspection.

12. Training and awareness

Staff involved in enrolment, data management and assessment receive training on:

- learner identification requirements;
- correct use of the LRS;
- data accuracy and fraud prevention.

13. Monitoring and review

Compliance with this policy is monitored through:

- internal audits;
- funding and data validation checks;
- quality assurance reviews.

This policy is reviewed:

- annually; and
- following changes to DfE, ESFA or funding guidance.

Date of last Review	Print Name	Position
02/02/2026	Keiran Casey	Chief Executive Officer
	Darren Beach	Quality Manager