Procedure for Issuing Learner References, Attendance Confirmations and Destination Information

Version: Draft Compliance Rewrite (Combined Reference and Attendance Process)

Date: October 2026

Version: 2.0

1. Purpose

This procedure ensures that learner references, attendance confirmations and destination information are produced, authorised and disclosed in a consistent, secure and compliant manner. It establishes controls to protect personal data and ensure compliance with UK Data Protection legislation and RNN Group policies. Requests falling outside the scope of this procedure will be referred to the Information Governance and Assurance (IGA) team.

2. Scope

This procedure applies to all staff involved in producing, reviewing, authorising or disclosing learner references, attendance confirmations or destination information.

3. Roles and Responsibilities

The IGA team is responsible for governance, compliance advice and escalation. Learner Recruitment and Reception Officers may process routine requests. Tutors may provide evidenced comments where appropriate. All staff are responsible for ensuring information is accurate and securely disclosed.

4. Lawful Basis and Data Protection

Personal data contained within learner references and attendance confirmations will be disclosed with the learner's consent. Consent may be obtained directly from the learner using the RNN Group Consent Form or

another approved method. The RNN Group will ensure that only information necessary for the purpose of the request is disclosed.

Any special category personal data must not be disclosed unless the learner has provided explicit written consent or another lawful basis has been identified in accordance with UK Data Protection legislation. Evidence that consent has been obtained must be recorded within the Learner Reference Log before information is disclosed to a third party.

5. Request Verification

All requests should be submitted to learnerreference@rnngroup.ac.uk. Before information is released, staff must:

- Verify the identity and legitimacy of the requester;
- Confirm that the learner has provided consent for the reference to be supplied;
- Ensure the request relates to the learner named within the request; and
- Record the receipt of consent and any resulting disclosure within the Learner Reference Log.

Where consent cannot be verified, no information should be released until consent has been obtained or the request has been reviewed by the Information Governance and Assurance (IGA) team.

6. Learner References and Attendance Confirmations

Learner references and attendance confirmations will be produced using the approved ProSolution template. Information included within the template is generated directly from learner records held within ProSolution and may include learner name, programme title, enrolment dates, attendance percentage, punctuality information, qualification details, expected completion dates and study hours.

References will only be provided where the learner has given consent for the RNN Group to respond to the request.

As the information is drawn directly from ProSolution, it is based upon the official learner record maintained by the RNN Group and is therefore considered factual and capable of being evidenced through institutional records. Any additional information included outside of the standard template must be accurate, factual and supported by appropriate evidence.

Third-party templates must not be completed. All Learner References and Attendance Confirmations must be issued using the approved ProSolution template.

7. Enhanced References and Tutor Contributions

Tutors may provide additional positive comments relating to academic achievement, employability skills, work placements, attendance or professional conduct. Comments must be factual, evidenced and capable of justification. All additional comments must relate directly to the learner's studies or activities within the RNN Group and be appropriate to the purpose of the reference.

8. UCAS References

Where a learner is applying for progression to Higher Education, references must be completed through the official UCAS process using the secure UCAS Adviser Portal. The UCAS reference may be completed by appropriately authorised staff with sufficient knowledge of the learner's academic performance and suitability for higher level study.

Guidance for Completing UCAS References

The reference should:

Provide an accurate overview of the learner's programme of study and academic achievements.

Include details of relevant course content, modules or specialist subjects where appropriate.

Reference any work placements or practical learning undertaken as part of the programme.

Include predicted grades for qualifications that have not yet been completed, where these are available and have been authorised by the curriculum area.

Comment on attendance, punctuality, commitment to study and engagement with learning.

Highlight strengths, achievements and skills that are relevant to the learner's chosen Higher Education programme.

Ensure any opinions regarding suitability for Higher Education are reasonable, objective and supported by evidence.

Staff must not include information relating to:

Health conditions;

Disabilities;

Additional learning support needs;

Personal circumstances;

Family circumstances;

Financial circumstances; or

Any other special category personal data,

unless the learner has provided explicit written consent for the information to be disclosed, or another lawful basis for disclosure has been confirmed by the Information Governance and Assurance (IGA) team.

9. Information That Must Not Be Included

References must not contain information about other learners or staff, unsubstantiated opinions, irrelevant personal information, or special category data without an appropriate lawful basis.

10. Secure Transmission

Documents containing personal data must be transmitted using approved secure methods. Password-protected documents must have passwords communicated separately from the protected document.

Where a recipient is unable to open a password-protected document, reasonable efforts should be made to facilitate secure access, including confirming the password, providing guidance on opening encrypted files, or using an alternative approved secure transmission method.

Where secure transmission is not possible and the document is required urgently, the learner's full name may be removed from the document and replaced with their initials before transmission. Staff must ensure that only the minimum information necessary for the stated purpose is disclosed and must consider whether the remaining information could still identify the individual.

Any decision to send a document containing learner information without password protection must be proportionate, justified, and limited to circumstances where the disclosure risk has been appropriately considered.

11. Learner Agreements

Learners may occasionally require a copy of their signed Learning Agreement as evidence of enrolment or attendance for organisations such as Council Tax Departments, Local Authorities, Housing Providers, benefit agencies or other authorised bodies.

Requests for a copy of a Learning Agreement may be processed as a business-as-usual activity at any main RNN Group reception desk. Before a copy is provided, reception staff must:

Verify the learner's identity by checking their valid RNN Group ID badge.

Confirm the learner's identity against the learner record held within ProSolution.

Ensure the request relates to the learner's own information.

Provide only the current or requested Learning Agreement relevant to the learner.

Where a learner cannot provide a valid ID badge, the request should be referred to the Information Governance and Assurance (IGA) team or an appropriate manager for further verification before any documentation is released.

Council Tax Enquiries

For Council Tax purposes, the UK Government defines a full-time student as follows:

For learners aged 20 and over, the course must:

Last at least one academic year; and

Require more than 21 hours of study per week.

For learners studying qualifications up to A Level and aged under 20, the course must:

Last at least three months; and

Require more than 12 hours of study per week.

Staff should note that the hours shown within ProSolution and on Learning Agreements may only reflect timetabled learning activity. Council Tax departments may also take account of:

Independent study;

Directed learning;

Homework activities; and

Work placement hours.

As a result, Council Tax departments or other authorised agencies may contact the relevant curriculum area to confirm the learner's expected total weekly learning commitment, including any study or placement hours undertaken outside scheduled timetabled sessions

12. Learner Destination Information

Destination information will only be disclosed where there is a lawful basis and an identified legal gateway permitting disclosure.

13. Audit Trail and Retention

Records of requests, verification checks, disclosures and correspondence must be retained in accordance with the RNN Group Data Retention Policy. The receipt of learner consent, the recipient organisation and the date of disclosure must be recorded within the Learner Reference Log.

14. Escalation

Any uncertainty regarding disclosure, consent, safeguarding or data protection must be referred to the IGA team before information is disclosed.

15. Related Documents

Data Protection Policy; Privacy Policy; Data Retention Policy; Acceptable Use Policies; Archiving Policy.

16. Contact Details

Learner Reference and Attendance Requests:
learnerreference@rnngroup.ac.uk.
Data Subject Access Requests:
sar@rnngroup.ac.uk.
Data Protection Enquiries:
dp@rnngroup.ac.uk.