

Unique pupil numbers (UPNs)

A guide for schools and local authorities, version 1.2

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Section 1 – Introduction to unique pupil numbers

A unique pupil number (UPN) identifies each pupil attending a state funded school¹ in England. Allocated on first entry to a school, the UPN is generated using the nationally specified formula (detailed in <u>section 1.3</u> below) and is expected to remain with a pupil throughout their school career regardless of any change in school or local authority.

1.1 Allocation of UPNs

UPNs are allocated at the point of a pupil's first entry into the state funded school sector. This is usually when a pupil joins a nursery or primary school (including joining nursery classes in a primary school), but can be another date where entry to the state funded school sector is later in a pupil's school career. The only exceptions to this are where a local authority advises that a UPN has already been allocated; for example, when a child has an education, health and care plan (EHCP).

Whilst it is expected that a UPN should remain with a pupil throughout their school career, it is permissible for a new UPN to be issued in situations where a child has been adopted or is at risk (see sections <u>6.5</u> and <u>6.6</u> respectively).

1.2 The UPN system and its purpose

UPNs are used to facilitate the transfer of school based education and attainment data through the state funded school system in England. The system enables accurate and timely data sharing between:

- schools
- local authorities
- central government

thereby strengthening procedures for target setting and contributing to the raising of standards.

UPNs are also used by the department within the national pupil database (NPD). The NPD combines data from pupil level census returns with the results of end of key stage assessments, external examinations and other accredited qualifications to provide invaluable evidence on educational performance to inform independent research, as well

¹ State funded schools encompass all local authority maintained schools and all Academies, Free Schools, UTCs et cetera who receive funding from the state. Independent schools are not classed as state funded.

as studies commissioned by the department. <u>Further information about the NPD</u> is available on our website.

1.3 The national UPN formula

Please see annex A for details of the national UPN formula.

Section 2 – Data protection

Schools are required to ensure that their use of personal data, which includes UPNs, is lawful and in compliance with the Data Protection Act 2018 (DPA) and the General Data Protection Regulation (GDPR). Further information of the <u>Data Protection Act</u> and <u>GDPR</u> are available from the Information Commissioner's Office (ICO) website.

2.1 UPNs and data protection

To assist schools in meeting their data protection obligations, a number of restrictions are in place on their use of UPNs. Such restrictions minimise potential risks to the privacy of pupils and ensure UPNs are used for educational purposes only. These are that:

- the UPN must lapse when pupils leave state funded schooling, at the age of sixteen or older
- the UPN must be a 'blind number' not an automatic adjunct to a pupil's name. It
 must be held electronically and only output from the electronic system when
 required to provide information to:
 - local authority
 - o central government
 - another school to which the pupil is transferring
 - a third party (for example, a supplier of a schools management information system) who have entered into an agreement to provide an education service or system to a school, local authority or government department and process data on their behalf (see section 2.2 below)
- The UPN must not be used for any purpose unrelated to education. A pupil's admission number, rather than the UPN, must be used as the general pupil reference number on the admission register or paper files
- GDPR considers the UPN as personal data, as the UPN falls within the scope of 'identification number' within the GDPR definition of personal data. As such, UPNs held with, or without, other data items remain within the scope of GDPR and must be protected accordingly
- subject to certain exemptions within the DPA and GDPR, a pupil (or a parent
 acting on his / her behalf) has the right to request a copy of information about
 them that a school holds (including their UPN). Other than identifying its use of
 UPNs within its privacy notice, schools should not take any other proactive steps
 to inform pupils, or their parents, of the presence of the UPN system or provide
 details of a pupil's UPN unless specifically requested

2.2 Sharing UPN data with third parties

Where a school (or local authority) has entered into an agreement with a third party for the provision of an education related service or system then it will be permissible for the UPN to be used within those systems in accordance with the usual transfer controls. This will be the case as long as the system or service has been initiated by the school and that school will retain control and, most importantly, ownership of the data. In such cases - for data protection purposes - the third party would be classed as a data processor on behalf of the school.

For example, it will be permissible to use the UPN in situations where a school has a contractual agreement with a third party service provider, such as:

- a provider of a management information system
- a provider of additional packages supporting schools with the management of a pupil's education including – but not limited to – packages supporting pupil attainment, assessments, attendance and registration

However, the sharing of UPN data with a third party for work or a service not commissioned by the school, local authority or another prescribed person would not be permitted nor would the sharing of UPN data for any purposes not related to education.

Where UPN data is shared with a contracted provider for data processing purposes, the contractor must be aware of its own data protection obligations under the DPA and the GDPR with respect to data processing. An overview of the GDPR can be found on the Information Commissioner's Office's (ICO) website here and the Data Protection Act 1998, here.

2.3 Data protection responsibilities for local authorities and schools

Local authorities and schools have a responsibility for maintaining the privacy of individuals about whom they collect, process or hold personal data. This is assisted by maintaining the UPN as a 'blind number' and ensuring that personal data is only transferred to those with a genuine right and requirement for its receipt. Local authorities are encouraged to monitor the movement of common transfer files (CTFs) on the s2s website.

Schools are responsible for ensuring that:

- all pupils are allocated a UPN
- no two pupils are allocated the same UPN
- a pupil does not have more than one current UPN

- where a pupil has moved between schools, all relevant information, including the UPN of the pupil, is electronically transferred to the receiving school
- UPNs are not printed or written on any reports or similar documents
- UPNs are not disclosed to anyone without valid consent or legitimate reason

Section 3 - Local authorities

3.1 Local authority responsibility for UPN allocation

Local authorities have the responsibility for allocating UPNs for pupils not educated in a state funded school (either temporarily or permanently), where they have not previously been issued with a UPN and fall into one of the following categories:

- pupils with SEN education, health and care plans who are in non-maintained or independent education
- permanently excluded pupils not attached to a state funded school

The local authority allocates UPNs for these purposes using the national formula and adopting a 'dummy' school number within the 3950 – 3999 range. Allocating 'dummy' school numbers for this purpose is at the discretion of the local authority and they must retain the single point of control of allocating UPNs for those pupils not educated in state funded schools. One approach that could be applied would be to use different 'dummy' school numbers for each type of unattached pupil, but there is no specific rule for this and the local authority may adopt a methodology that suits their purposes locally.

3.2 UPN generation

Local authorities can make use of the department's <u>UPN Generator</u> spreadsheet to generate UPNs for these pupils if this is not possible within their local management information system.

3.3 UPN retrieval from previous schools

Whether or not a pupil's previous school is known, where the new school has been unable to obtain the UPN, their local authority school census contact may be able to provide assistance through:

- searching of the local authority's own internal database system this is particularly the case for situations where the previous school is within the same local authority
- via the key to success and / or s2s websites
- the school census contact in the previous school's local authority for situations where the previous school is in a different local authority

Section 4 - State funded schools

4.1 Statutory requirement for state funded schools to allocate UPNs to their pupils

<u>Section 537A of the Education Act 1996</u> enables the Secretary of State to require state funded schools to provide certain information, including UPNs, to local authorities and the department including: key stage assessment information and pupil level census returns. <u>Section 408</u> of the same Act enables the Secretary of State to require the transfer from school to school of pupil records, including UPNs, using CTF. Schools are legally entitled to transfer such data and do not need to seek pupils' or parents' consent to do so.

It should be noted that only local authority maintained schools have a statutory duty to transfer data including the UPN by use of CTFs. For all other establishment type, this remains best practice.

The table below provides an indicative guide as to which schools are required to allocate UPNs to their pupils:

	Requ	
UPN allocators	to allo	
School type	YES	NO
Private / voluntary / independent provider of early education (including	×	√
childminders and childminder agencies)	*	•
Nursery school	✓	×
State funded primary school	✓	×
State funded secondary school	✓	×
State funded special school	✓	×
State funded all-through school	✓	×
Non-maintained special school	✓	×
Independent school	×	✓
City technology college	✓	×
State funded pupil referral unit or alternative provision academy / free	√	×
school	•	*
Local authority alternative provision placement	×	✓
Non-state funded alternative provision provider	×	√

4.2 UPN generation in state funded establishments

UPNs can be generated automatically using school management information systems (MIS).

Advice on the routines used to generate this data should be directed to the school's own software supplier.

Though not the preferred option because of an increased likelihood of introducing data errors, state funded establishments may manually allocate UPNs using the <u>DfE UPN</u> <u>Generator</u> as an alternative to the MIS process. This spreadsheet will generate UPNs for pupils based on a school's local authority number and the departmental establishment number (the LA / Estab). Please note that a new spreadsheet is required for each new academic year. Where a school starts an academic year using the UPN generator spreadsheet, to avoid the introduction of duplicate UPNs it must continue to use the spreadsheet for the whole of that academic year, and not switch to allocation via management information software until September of the following academic year.

4.3 UPN retrieval from previous schools

For a pupil transferring from another school, the previous school must notify the new school of the pupil's UPN. In cases where this does not occur, the new school should make reasonable efforts to ascertain the child's UPN.

Where a child's previous school is known, the new school will contact it to request the UPN (which can be transferred using the pupil common transfer file). On receipt, the UPN is recorded in the normal manner. Where the former school fails to provide a pupil's UPN the receiving school informs their local authority school census contact who may be able to provide assistance. Similarly, in cases where the previous school is not known, the local authority school census contact may be able to investigate and confirm the pupil's valid UPN (see section 3.3 for further details).

Section 5 - Independent schools

5.1 Allocation of UPNs by independent establishments

There is no statutory duty placed on independent schools to maintain UPNs and; whilst they may use the CTF to transfer pupil records in or out of their school; they do not need to include UPNs within the data transferred. It is, however, permissible for an independent school to allocate UPNs where they have the ability or desire to do this.

5.2 Generation of UPN by an independent establishment

Where independent schools have access to an MIS, UPNs may be produced automatically using programmed software routines. Software suppliers will be able to provide the relevant support to enable this.

In cases where MIS access is unavailable, independent schools may alternatively use the department's Microsoft Excel <u>UPN Generator</u> spreadsheet. Use of the spreadsheet requires the local authority number and the departmental establishment number (LA / Estab) of the school. Although not directly associated with a local authority, independent schools must use the number of the local authority within which they are physically located. If not known, this can be accessed from the department's <u>'get information about schools'</u> website. Please note that a new spreadsheet is required for each new academic year. If a school starts an academic year using the UPN generator, to avoid the introduction of duplicate UPNs it must continue to use the spreadsheet for the whole of that academic year, and not switch to allocation via MIS until September of the following academic year.

5.3 UPNs received by independent schools from state funded schools

When a pupil joins an independent school from a state funded school the pupil's UPN will be provided. Independent schools will keep a record of the UPN and share it as necessary where the pupil returns to the state funded school sector, but are not otherwise required to do anything with it. Where an independent school does not have a UPN for the pupil, but is requested for one by a receiving state funded school, it is sufficient to advise that as an independent school it is not statutorily required to hold UPNs and therefore does not have one.

Section 6 - Further operational guidance for all users

6.1 Temporary UPNs and their allocation

Temporary UPNs are allocated when a school receives a pupil who may already have a UPN, but the receiving school does not yet know the UPN (for example, a CTF from the pupil's previous school has yet to be obtained).

The formula for temporary UPNs is identical to that for permanent UPNs, except that characters 11-13 are a two-digit serial number plus a letter, rather than a three-digit serial number, for example, X001800017**01A**. When calculating the check letter, use the check letter table shown in <u>annex A</u> to convert the letter to a numerical value and then follow the steps detailed to calculate the check letter. Temporary UPNs should be replaced immediately once the valid UPN is known with the temporary UPN being reported in the 'former UPN' field.

6.2 A pupil with more than one UPN

In all circumstances, it is standard practice to use the UPN issued by the first school the pupil attends as this UPN should remain with the pupil throughout their school career and should replace any subsequent UPNs allocated to the child. However, where another UPN has been used to register the pupil for Key Stage assessments, this UPN should be kept for data continuity purposes as the current UPN. In such situations any additional, or previously allocated, UPN should be recorded as a 'former UPN'.

6.3 Use of the 'former UPN' field

This field should only be used within your management information system, and returned to the department via your census return, in one of two circumstances:

- firstly, where a temporary UPN has been allocated pending retrieval of a permanent UPN
- secondly, where a permanent UPN is allocated but one is subsequently identified which has already been used for the recording of Key Stage assessments

In either case, the temporary UPN or second issue of UPN should be recorded in the 'former UPN' field and the original UPN retained for future use as the main (or current) UPN.

Please note: where a UPN has been allocated and is then reallocated to a different child, this is termed as being wrongly allocated (for example, a search for a pupil has resulted in an incorrect UPN being recorded for that pupil). In such circumstances, the incorrectly allocated UPN **must not** be recorded in the 'former UPN' field but rather replaced by the correct UPN or, where a UPN has not previously been allocated, a new and accurately generated UPN.

6.4 Allocation of UPNs to dually registered pupils

In all cases, pupils must have only a single UPN. Where a dual-registration agreement exists prior to a pupil's first entry to school, the school holding the pupil's main registration is responsible for allocating a UPN and notifying it to the school holding the pupil's subsidiary registration. Without a dual-registration agreement, responsibility for allocation of the UPN reverts to the first school the pupil attends as per the standard practice for UPN allocation.

Please note: for nursery pupils it is not necessarily the 'morning' school that holds the main registration, but rather as standard practice, the first school the pupil attends. For highly mobile children, for example, from travelling families, a UPN will be allocated by the school the pupil attends ordinarily. This UPN is shared with each temporary school, as becomes appropriate, rather than each of those schools allocating temporary UPNs.

6.5 Adopted children

Standard practice for pupils who are adopted after they have been allocated a UPN is that they should be issued with new permanent UPNs and their previous UPN should be deleted and not recorded under 'former UPN'. As part of this process, it is important that there is no link retained between the pre-adoption record (with the original UPN) and the post-adoption record (with the new UPN).

However in situations where the adoption creates no safeguarding risks to the individual pupil – for example, where the child has remained within the same school before, and after, adoption and has undergone no material change in identity as a result of the adoption, it is permissible to retain previous UPN information for the adopted pupil where express permission has been granted by both the pupil's adopted parents and the designated manager of the local authority's adoption service.

6.6 Children at risk

Schools may receive pupils who, for their own safety, have changed their identity. This will be the case for children in the witness protection programme and for those fleeing from abusive family members. As part of their new identities, these pupils must be issued with new permanent UPNs and their previous UPN must be deleted and not recorded under 'former UPN'. As part of this process, it is important that there is no link retained between the original and new pupil records.

6.7 Scotland, Wales and Northern Ireland

UPNs issued by Welsh schools can be fully integrated into the English system and should therefore be retained as the permanent UPN.

UPNs issued by Scottish and Northern Irish schools cannot be integrated into the English system; therefore, schools must either:

- allocate new permanent UPNs for pupils transferring from Scotland or Northern
 Ireland if the pupil has never been allocated a UPN by an English or Welsh school
- retrieve and use the previously allocated UPN for pupils transferring from Scotland or Northern Ireland if the pupil has previously been allocated a UPN by an English or Welsh school

6.8 Overseas pupils

Usually a pupil from overseas will not have been allocated a UPN and should therefore be issued a UPN by the first state funded school they attend. Exceptions to this would be pupils from British forces schools, British overseas establishments or schools in the crown dependencies. In such examples, schools may have issued pupils with a UPN and, if this is the case, their original UPN is retained (and should be obtained from the pupil's previous school). Even if the pupil is only entering the English education system for a limited amount of time, he or she are still issued a permanent UPN and not a temporary UPN.

6.9 Special educational needs (SEN) pupils

Typically, SEN education, health and care plans (EHCP) will be issued once a child has started their school career. In such cases, their UPN will be allocated by their school in the usual way. Occasionally, a local authority may issue an SEN EHCP before a child commences education; or, where they are not attending a mainstream / state funded school. In these circumstances, the local authority that issues the SEN EHCP will also allocate pupils' UPNs and notify schools as becomes appropriate.

6.10 Sharing UPN data

6.10.1 Local authority social service departments

In the case of looked after children, UPNs may be transferred to local authority social service departments. Where pupils access their education through alternative provision, their UPN must be shared with the National Careers Service (formerly the Connexions Service) so that their progress and achievement can be tracked.

6.10.2 Requests for UPN data by educational researchers

Requests for UPNs from researchers need to be treated cautiously. The restrictions placed on the use of UPNs (see section 2) mean that it is only possible for UPN data to be shared between schools, local authorities, the department and other prescribed

government departments (OGDs) for purposes related to education. Where a researcher can evidence that their work has been initiated by one of these parties then it is admissible to share data in accordance with the usual transfer controls. Where no genuine link between research and schools, local authorities, the department or a prescribed OGD can be established, UPN data **must not** be disclosed, as to do so may put a child at risk.

6.10.3 Requests for UPN data by third parties

Please see <u>section 2.2</u> for details of situations where it is permissible to share UPN data with third parties.

6.10.4 UPN access requests

Where a person requests a UPN but has no clear parental responsibility for the child whose UPN they wish to access, this is refused immediately. The following steps are taken to establish access rights to UPNs:

- verify the true identity of the person seeking the data (including their relationship to the child)
- ascertain why the information is being sought
- identify whether the person has parental responsibility for the child in question or the person has another right to access the data
- where the person seeking this information does not seem authorised to do so, inform the person that the school or local authority is unable to disclose such personal information
- where the person still persists, contact the resident parent (or parents) or carer (or carers) of the child to request consent to disclosure
- where consent to disclosure is given then the data may be given
- where consent is not given then the data may not be given

Section 7 – Further information

General enquiries regarding UPNs or this guide may be made to the department via <u>service request</u> form.

Annex A - The national UPN formula

The UPN is comprised of 13 characters that are:

- a single check letter (see below for calculation)
- the local authority code (3 digits)
- the departmental establishment number of the school allocating the UPN (4 digits)
- the year of allocation (2 digits the year in which the academic year of allocation begins)
- a school allocated serial number (3 digits)

The combination of these characters is a simple means of guaranteeing uniqueness as no two schools can allocate the same UPN to two different pupils.

Please note that a UPN is unique to the pupil to whom it is allocated. A UPN must never be re-issued to another pupil. Once a pupil's school career is complete, their UPN must be archived as part of their school record.

The table below provides an explanation of how the formula is applied to calculate the check letter and worked example:

UPN calculation													
Character number	1	2	3	4	5	6	7	8	9	10	11	12	13
UPN component	Check letter This letter, calculated using the digits at characters 2-13 confirms the UPNs validity	nur A 3 nun unid eac autl allo by t	horit mber digit nber que t h loc hority cate	t to cal y,	esta num A 4-0 uniqu scho auth	artme blishiber digit nue to e ool with ority, a ne dep	ment umber each nin a l	ocal ted	year in the acad	using 2 s of the ic year the d. note: ber ly be the which demic gins and year in	Serial number A 3-digit number, unique to each UPN allocated by a school in any given year		ool
UPN (example)	Н	8	0	1	2	0	0	0	0	1	0	0	1

Step 1:

Using the example above, disregard the check letter (character 1) and work across the table multiplying each digit of the UPN (left to right) by its character number starting with character 2 as follows:

Step 1						
Character number	Value	Multiply by character number	Result			
2	8	2	16			
3	0	3	0			
4	1	4	4			
5	2	5	10			
6	0	6	0			
7	0	7	0			
8	0	8	0			
9	0	9	0			
10	1	10	10			
11	0	11	0			
12	0	12	0			
13	1	13	13			

Step 2:

Add together the result for each character, 2 to 13.

Thus; 16 + 0 + 4 + 10 + 0 + 0 + 0 + 0 + 10 + 0 + 0 + 13 = 53

Step 3:

Take the sum total and divide it by 23.

Thus, 53 / 23 = 2 remainder **7**

Step 4:

Using the example above, take the **remainder figure**, in this case 7, with reference to the table below, record its check letter. The letter corresponding to 7 is H and therefore this is the valid check letter.

Check letter table										
0 = A	1 = B	2 = C	3 = D	4 = E	5 = F					
6 = G	7 = H	8 = J	9 = K	10 = L	11 = M					
12 = N	13 = P	14 = Q	15 = R	16 = T	17 = U					
18 = V	19 = W	20 = X	21 = Y	22 = Z						

Please note: letters I, O and S have not been allocated as check letters and should never be used as such.



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