

# University Policy on placements

## 1. Introduction and Context

This policy refers to arrangements made for students to take part in placements or other work-based learning outside of the University of Southampton's core campuses as part of a programme of study. This policy is mandatory for all placements and work-based learning contributing to University of Southampton programmes although it is recognised that how it is implemented will vary depending on local circumstances. It is informed by the Chapter B10 of the QAA Quality Code *Managing higher education provision with others* and supersedes the University's previous *Practice Placement Guidelines*. It is designed to support, rather than replace, individual Faculties' policies for placement learning.

Chapter B10 includes, amongst other issues, the following requirements:

- Degree awarding bodies commit the necessary staff and other resources to arrangements.
- The central locus of responsibility for arrangements to deliver learning opportunities with others is clear, as are the delegated responsibilities at different levels of the organisation.
- The risks of each arrangement are assessed at the outset and reviewed subsequently on a periodic basis.
- Degree awarding bodies ensure that they have thoroughly considered the financial standing of prospective delivery organisations or support providers.
- Provision is made to suspend or withdraw from an arrangement if the other organisation does not fulfil its obligations or if its ownership or status changes in such a way as to jeopardise the arrangements.
- Arrangements for delivering learning opportunities with others are reviewed periodically.
- Appropriate and proportionate due diligence procedures are determined for each proposed arrangement for delivering learning opportunities with other organisations.
- There is a written and legally binding agreement, or other document, setting out the rights and obligations of the parties.
- Mechanisms are put in place to monitor and ensure that the terms, conditions, and expectations that were originally approved have been, and continue to be, met.
- Degree awarding bodies are responsible for ensuring that students admitted to a programme who wish to complete it under their awarding authority can do so in the event that a placement fails due to circumstances outside of the student's control.
- An assessment is made of the appropriateness of the staff at the placement provider to deliver the type of learning or support involved on the relevant modules, for example mentoring or supervising skills.
- Degree awarding bodies need to consider the appropriateness of physical learning resources and the learning environment provided by a placement provider.

Placements can play a key role within academic programmes. During placements students develop their practical skills, their reasoning and judgement and have the opportunity to reflect on employment practice. The University believes that placement benefits students in their future careers and therefore encourages students to partake of opportunities offered to them.

This policy outlines the responsibilities of Faculties and students involved in placements, as well as general advice on Health and Safety, Insurance and Indemnity, Confidentiality, and Equality issues.

## 2. Work based learning/Industrial Placements/Practice Placements

### a) In general

All Faculties where students may engage in work based learning with a host institution should ensure that there is:

- Sufficient capacity (in number and quality) of placement opportunities to meet the learning outcomes of students.
- Designated, permanent staff responsible for the approval, organisation and evaluation of placements.
- Appropriate training for University of Southampton staff directly involved in placement activity. This should include guidance on identifying suitable placements, how to brief outgoing students, what contact should be made with students during placement, how placements are quality assured, legal and insurance requirements, and how placements are evaluated.
- A clear and transparent approval process to approve prospective placement providers to ensure the quality of the learning environment.
- An agreed review timetable to look at the continuing viability of placement opportunities, with an appropriate review mechanism. How a review is conducted will vary depending on the type of placement available to students.
- An up to date list of all students (including contact details) on placement.
- A list which contains the name and address of placement providers. This should be noted by FPC annually.

### b) Setting up a placement with a new provider

Whether placements are arranged by students or the University, when an arrangement with a placement is set up for the first time, the University is responsible for ensuring :

- Checks have been made (and records kept) on the company or organisation providing the placement to ensure it is an appropriate host for University of Southampton students. This may include site visits, checks of regulatory body reports (i.e. Ofsted, CQC) or an assessment of the financial viability of the company through records kept at Companies House, for UK based placements.
- Where the placement provider will be contributing to the learning outcomes of a programme, for example in providing the work for a project based dissertation, the provider understands the requirements of UK higher education, and its role in delivering the programme.
- A written and legally binding agreement or other document is in place setting out the rights and responsibilities of the placement provider, University of Southampton, and any student hosted by the placement provider.
- Staff at the placement provider involved in mentoring, educating or assessment of University of Southampton students have appropriate training to carry out these roles.
- The placement is compatible with any guidance provided by the relevant Professional, Statutory or Regulatory Body.
- The placement provider is compatible with the [University's ethics policy](#), including any statements of responsible collaboration.
- There is a named individual in the academic unit responsible for approving placements.
- For clinical practice placements, ensuring that adequate indemnity insurance, occupational health and safeguarding requirements for incoming and outgoing students are in place (see below).

### c) Before a student starts on a placement

Before a student embarks on a placement, the Faculty is responsible for:

- Ensuring that there is a risk assessment in place.

- Where a Faculty is responsible for allocating placements, an allocation method is used which is fair and transparent, with only those students with established special circumstances or needs (for example, as defined by the Equalities Act) given priority over specific placements.
- Briefing students about the placement. Depending on the opportunity, this may include:
  - Details of how the student will be able to evaluate their time in placement
  - A description of the contact the student should expect with the University of Southampton during their time on placement, including details of any supervisor or mentor.
  - Any roles or responsibilities required of the student in the written agreement between the University and the placement provider
  - Guidance on how to raise concerns about their placement with the Faculty, including guidance on whistle-blowing, if appropriate
  - Any relevant information on their work placement's setting
  - Details of how to contact the University of Southampton in an emergency
  - Full information on health & safety matters before they commence the placement.
  - Full information on professional requirements before they commence the placement
  - Supervision or mentoring arrangements.
- Briefing students –through a clear, published statement – on the consequences if a student fails or does not complete their placement.
- Setting up, if required by the general agreement with the placement provider, specific agreements concerning the work placements.
- Completing a health and safety risk assessment of each placement, including checking any international arrangements against Foreign and Commonwealth Travel Advice.
- Ensuring that the placement provider is provided information about individual students' needs (for example, a disability) which is relevant to the completion of the placement. This should only be done after receiving the student's explicit permission, and may be more effectively done by the student. Any UK placement that is an integral part of a higher education programme will be covered by both the education and employment provisions of the Equalities Act 2010.
- Ensuring that students have undertaken any necessary checks such as medical screening or Disclosure and Barring Service (DBS) checks before starting the placement. Students who will not submit to these checks are not to be offered places to study programmes which require them.
- Working with the student to ensure that any conditions connected with their UK Tier 4 visa (for international students) have been met. Tier 4 students should be referred to the Visa and Immigration Student Advice Service Team.

**d) During the placement period**

During a period of placement, the Faculty is responsible for:

- Maintaining contact with the student, as outlined before the student left the University of Southampton. This may vary between regular site visits to an occasional email communication, depending on the nature of the period away from the University of Southampton.
- Maintaining records of students on placement, including contact details, address of their hosts, and duration of time away from the University
- Ensuring that the placement continues to provide an adequate learning environment for the student, and if it fails to do so, to find an alternative so the student's potential to complete the programme is not jeopardised. For example, this may be required if a placement provider received a negative report from a regulatory body which would compromise its ability to provide an adequate work placement for a University of Southampton student.
- Maintaining a student's record on Banner using the [appropriate coding](#).

**e) At the end of the placement**

Once a student has finished their time on placement, the Faculty is responsible for:

- Responding to the student's evaluation of their time away from Southampton, including following up issues with the placement provider if appropriate
- Carrying out any relevant assessments based on the time on placement

**f) Reviewing placements**

Placement providers should be reviewed on a regular basis in line with the requirements for setting up placements set out in this policy. Records of this review should be kept by the Faculty.

### **3. Health and Safety**

Universities have a statutory duty to ensure, in so far as is reasonably practical, the health, safety and welfare of their employees, students and placement providers. With regard to the welfare of this latter group, the responsibility lies in not willingly placing a student whom they know, or suspect, may pose a risk to the placement provider, its customers, clients, pupils or patients.

There should be suitable local documented management arrangements in place within faculties that describe how placements are organised and implemented with specific roles and responsibilities of key personnel clearly identified. A risk assessment should be carried out which would identify key hazards of all aspects of the placement from travel and accommodation to local work that is to be undertaken at the time. Often other organisations will require a risk assessment to be completed, but the University still has the responsibility for ensuring that the risk assessment is suitable and sufficient. To assist with this, staff should refer to the [UCEA/USHA Health and Safety Guidance for the placement of students](#). The risk assessment should be reviewed as part of the placement evaluation process on a regular basis.

As part of training, faculties should ensure that their students are given briefings and information on the outcomes of the placement risk assessment which in effect becomes the code of practice. Students should also go through a checklist of actions developed by the Faculty that identifies what the student needs to do and be aware of.

For students undertaking placements abroad, it is particularly important that risk assessments are carried out and the University Risk Assessment template should be used. This could be given to the placement provider should they wish. The sign off process of risk assessments should be approved through Faculties. Overseas placements should pay particular attention to the information provided by the Foreign and Commonwealth Office for a country or region they are going to. This information should be included within the risk assessment.

On arriving at the placement students should be fully inducted on health & safety matters from the provider on the first day (or as soon as possible thereafter) and should sign to record that they have received this. The quality and suitability of the induction training should be part of the pre checks carried out by the Faculty when setting up an agreement for the placement programme with the provider.

It is important to ensure that if any incidents or accidents occur whilst on placements that appropriate emergency arrangements are effective and that this is recorded with the University Safety and Occupational Health department and fed back into the evaluation process of the placement that the Faculty has responsibility for.

For further advice on this please contact University of Southampton Safety and Occupational Health department (Health and Safety).

#### **4. Equality and Diversity**

Any placement that is an integral part of a higher education programme will be covered by both the education and employment provisions of the Equalities Act 2010. In particular it is required that Universities do not:

- Treat a student less favourably than other students;
- Fail to make reasonable adjustments where such failure places students at a substantial disadvantage compared to their peer group. (This applies to all off-site activities including field trips, placements and organised social events.)

Faculties must therefore be pro-active in locating suitable placement opportunities for those students with protected characteristics and vigilant that no discrimination occurs during the course of identifying, providing or assessing placement. Faculties should work with the Student Services (Enabling Services) to identify any equipment and/or assistance that can be provided to help individual students with specific needs.

Placement providers should be provided with information about individual students' needs (with the student's explicit permission) in order to plan for their learning. They must not be allowed to discriminate by refusing to take the student on placement without reasonable grounds or by providing a substantially different experience than that offered to other non-disabled students. The laws for non UK providers may be different, but it is important that the University establishes a position of protecting students enrolled on its programmes from discrimination, and enabling maximum participation. The University should consider whether to terminate a relationship with a provider which is unable to offer placements for all of its students.

#### **5. Insurance and Indemnity**

During the course of a placement, it is possible that things may go wrong. Generally, the main risks are:

- The student may be injured as a result of placement activity;
- The student may, without intention, cause injury or damage as a result of placement activity;
- The student may deliberately cause injury or damage during placement activity.

Generally, UK liability accepts that students on work experience or placement are deemed as 'employees'. This means that if either the student or a third party makes a claim, it would be dealt with by the employer's (i.e. placement providers) insurers. The University would not normally be involved in any claim.

Students who attend placement in health services and who will be expected to deliver clinical interventions are not covered by the University for any claim linked to medical mal-practice. All Faculties must check that placement providers carry liability insurance which covers this circumstance. If they do not, and the Faculty still wishes to proceed to use the placement, then students will be required to obtain personal cover in their own name. Many professional associations provide this cover at a beneficial rate and so it may be that students should be encouraged to join such associations.

The University may be liable if a student were to claim that the Faculty had not undertaken a proper risk assessment or health & safety check, before placing them in an environment where they subsequently came to harm.

All students attending overseas placements should have appropriate insurance cover. In some cases, this may be provided by the University's Insurers. However, most undergraduate students will need to purchase separate insurance cover, and there is an option to buy cover from the

University's insurers, through the University's online store. Full details can be found on the [University's Finance webpages](#). In addition, travellers to EU countries need a Health Insurance Card obtained through the Post Office or [online](#).

## 6. Confidentiality and Data Protection

Confidentiality is an area which may impact on the University's liability for students on placement. Any information given by a student to the Faculty, or known about them, is to be treated as confidential. However, in a situation where the Faculty is aware of information which might suggest that there is a greater risk of injury to customers, clients, pupils or patients, it may be necessary to disclose that information to the placement provider. This is a complex area and Faculties may need to take advice from legal services on a case-by-case basis.

Placements inevitably involve some disclosure about students to the placement provider, but before disclosing information about a student the Faculty should ensure that it complies with the requirements of the Data Protection Act (DPA) 1998. In practice this means gaining the explicit permission of students to disclose such information. This is particularly important when this is 'sensitive' data relating to, for example: health status; disability issues; criminal convictions, cautions or bind-overs. At the start of their programmes, Faculties should inform students of the type of information it is deemed necessary to disclose and to alert them to the fact that they may be prevented from attending placement – and thus from completing programme requirements – if they do not give permission for this disclosure.

| Document Information |                                                  |
|----------------------|--------------------------------------------------|
| Author               | QSAT                                             |
| Owner (Committee)    | AQSC                                             |
| Approved Date        | February 2014, January 2015 (updated hyperlinks) |
| Last Revision        | September 2015                                   |
| Type of Document     | Policy                                           |