



UNIVERSITIES & COLLEGES
EMPLOYERS ASSOCIATION

UCEA Health and Safety Guidance

for the placement
of Higher Education students

Produced in association with



About UCEA

UCEA represents UK higher education institutions, and provides advice and guidance to them, on employment, reward and human resources practice.

UCEA aims to be a valued representative of, and adviser to, higher education sector employers on the delivery of excellence in human resources management.

We aim to:

- advise our subscribers promptly, accurately and helpfully;
- consult effectively with our subscribers;
- engage in regular and constructive dialogue with our wider stakeholders;
- deliver effective services at good value;
- embed equality and diversity in all our activities.

First published in August 2009 by Universities and Colleges Employers Association (UCEA) in association with the Universities Safety and Health Association (USHA) and Higher Education Occupational Physicians/Practitioners (HEOPS).

This document supersedes the 1997 UCEA/CVCP document Health and Safety Guidance for the Placement of HE Students (referred to in this document as “the 1997 guidance”), which has been withdrawn.

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1 Foreword

Student placements are an essential part of many degree programmes and an important part of other degrees, where they enable students to gain experience of work. Placements have very different structures depending on the discipline and the HEI. This guidance provides a generic framework for considering and managing health and safety issues relating to student placements. It is not intended to be exhaustive, but is aimed at helping institutions arrive at their own individual solutions, geared to local needs. Health and safety is only one aspect of the support and development of students on placement and thus it needs to be an integral part, rather than a stand-alone part, of the whole experience.

This guidance describes what is required in approving placements, preparing students for placement and supporting the students in terms of their health and safety on placement both in the UK and overseas. The main difference between this guidance and the 1997 version that it replaces is that this encourages a risk-based approach.

I strongly recommend that this guidance is used by those responsible for student regulations and for managing student placements in your institution, including registry functions, placement organisers, administrative staff, visiting tutors and health and safety professionals, as a means of reducing the risk to students.



Professor Noel Lloyd
Vice-Chancellor, Aberystwyth University
Chair, UCEA Health and Safety Committee

2 Glossary of terms

Placement:

The term 'placement' refers to a period of work experience, paid or unpaid;

- Which is undertaken as an integral part of the student's course.
- Where the student is enrolled at the institution during this period.
- Where there is the transfer of direct supervision of the student to a third party.

HEI:

Higher Education Institution, i.e. an institution that has students enrolled with it on Higher Education courses.

Placement provider:

The placement provider is the third party to whom, during the placement, responsibility for direct supervision of the student is transferred. An HEI (including the student's own) can also be the placement provider if it is the organisation providing the placement.

Workplace supervisors:

Anyone engaged by the placement provider who is assigned to supervise or to look after the student during the placement.

Placement organiser:

Any member of HEI staff to whom authority is devolved for authorising placements of students with placement providers.

Placement/Visiting tutor:

Any individual employed by, or contracted to, the HEI who visits students on placement.

3 Executive summary

This sector guidance provides a strategic and generic framework for the sensible management of:

- The health, safety and welfare of students on placement; and
- The risks arising from health and safety related liabilities associated with placements.

It is based on recognition that:

- Each HEI is likely to have its own regulations and arrangements for student placements.
- Placements vary considerably.
- The prime purpose of any placement is to provide a learning and development experience for the student. Health and safety needs to be an integral part, rather than a stand-alone part, of the whole process and experience.
- Higher education should be encouraging students to learn how to assess and manage risk: it is important that the application of this guidance encourages this.

This guidance is substantially different from its predecessor in that it encourages a risk-based and risk management approach that can be applied to all student placements. This allows a lighter touch on placements with relatively low risks and more rigorous control measures where the risks are greater.

Since a placement is an integral part of the student's course, the HEI has the right to refuse to approve any placement on health and safety grounds.

It is recommended that HEIs adopt the following risk management principles to their management of student placements:

- Clarity of understanding by each party of their roles and responsibilities.
- Preparation of the student such that they are in a position to understand the risks and to make informed judgements.
- There are processes for enabling problems to be raised and resolved prior to, during the course of, and at the conclusion of the placement.
- There are contingency plans in case there are exceptional circumstances.
- Staff who are involved in handling student placements have guidance and training on the HEI's policies and the arrangements that they must follow.

This approach should be applied both with regard to specific groups of students and with regard to issues that apply to individuals at extra risk on placement.

Registrars and Directors of Health and Safety are recommended to take note of this guidance and consider and implement it as appropriate to their HEI. This should include ensuring placement staff are provided with guidance and training on the policies and arrangements that they must follow.

This approach should help HEI governing bodies and their committees with oversight of student placements to have assurance about the management and governance of student placements.

4 Scope

This guidance is relevant to a wide range of placement types. It is relevant for placements whether in the UK or abroad. It is also appropriate for placements that are subject to professional standards and to those involving significant hazards such as in the construction or chemical industries or in veterinary, medicine, or dentistry practices.

There are a few groups for which additional legal requirements apply and where the general approach recommended in this guidance may not be sufficient. These are:

- Placement of students under the age of 18 since they are subject to more rigorous risk assessment under the Management of Health and Safety at Work Regulations;
- Placements to which specific contractual or legislative requirements apply, such as the placement of nursing-students and students on teacher training.

Other special cases that need separate consideration beyond the general guidance provided in this document include:

- Placements undertaken in the armed services; or
- Where a student acts in the capacity of a self-employed person and there is no transfer of direct supervision of the student to a third party.

Part 1: Strategic framework

5 Risks and liabilities

Guidance from the funding councils has emphasised the need for HEIs to take a risk management approach. This guidance encourages a risk-based approach to student placements. The risks relate to injury/ill health; legal liability, both criminal and civil; and business risk.

The following undesirable outcomes could arise from a placement:

- The student could be injured or suffer ill health as a result of working at a placement provider.
- The student could be injured or suffer ill health while on placement but not as a result of working at the placement provider.
- The actions of the student could cause injury or ill health to others, damage to property, or loss of income to a business.

If any of these were to occur, criminal or civil action might be taken against the student, the placement provider or its employees, or the HEI or its employees, depending on the circumstances.

Criminal Liability

For placements in the UK, with regard to criminal liability under health and safety legislation:

- Primary responsibility for the management of the health and safety for a student while on the placement lies with the placement provider (under Section 2.1 of the Health and Safety at Work Act 1974). The student will be treated as equivalent to one of their own employees in relation to health and safety matters.
- The student has responsibilities to follow instructions and act sensibly to protect their own health and safety and that of others (as set out in Sections 7 and 8 of the Health and Safety at Work Act 1974).
- If HEIs follow the guidance on sensible risk management contained in this document then they will be addressing their responsibilities (under Section 3 of the Health and Safety at Work Act 1974) for non-employees.

For placements outside the UK, the criminal liabilities on each party will be a matter for the enforcing authorities and the courts in both the UK and in the country where the placement occurs. With regard to placements abroad, implementation of this guidance on sensible risk management will address criminal liability under UK law (Section 3 of the Health and Safety at Work Act 1974) for non-employees.

Implementation of this guidance will also provide evidence in defence of charges of negligence under UK Corporate Manslaughter or Gross Negligence Manslaughter legislation.

Civil Liabilities

The nature and extent of civil liabilities between the HEI, placement provider and student and the nature and extent of their civil liabilities to others are affected by many factors which will only be resolved in the courts and may depend on which country's legal system is deemed to have jurisdiction.

Civil liabilities are affected by the nature of any agreements between the parties, any statements made by the parties in advance about what they offer, and civil law relating to contracts and services.

Any statements that are made by the HEI or by functions or individuals of the HEI about the extent of the HEI's duty of care could be taken as admissions of liability and could significantly affect the outcome of criminal or civil proceedings. For instance, this could include statements in the HEI's regulations, marketing materials or briefings to students about the checks that the HEI makes on placement providers where it is later found that the specified processes were not carried out.

6 Business risk management

In addition to the guidance in this document on health and safety risk management, HEIs are encouraged to review their business risk exposure on student placements in light of the comments in this document. This is not essential from a health and safety perspective but should be of benefit to the governance of the HEI in terms of adverse financial or public relations exposure. Issues that could be incorporated into the business risk review include civil liabilities arising from unguarded assurances, promotional claims and exclusions in insurance policies.

7 Regulations and policies

The HEI should have statements about how student placements are established and managed with regards to health, safety and welfare issues. These statements should, preferably, be part of the HEI's overall academic guidance or regulations on student placements.

8 Risk management approach

8.1 General approach

The HEI should have general guidance and control measures for student placements.

Risk management principles provide a framework for the general guidance and control measures that are appropriate for managing the diversity of placements, issues, and risks associated with the broad range of potential placements and potential scenarios.

The benefits of a risk-based approach are that requirements for lower risk placements are minimised, whilst resources are concentrated on those placements likely to be higher risk.

Implementation of the following health and safety risk management approach is recommended:

- Review and approval of placements
- Processes for raising and resolving problems
- Planning for contingencies
- Ensuring each party understands their roles and responsibilities
- Preparation of students
- Training of staff

Practical guidance on the application of this approach by placement organisers is provided in Section 9, which should be read in conjunction with Appendices A to D.

8.2 Review and approval of placements

It is recommended that HEIs adopt a risk assessment and review process for student placements.

The application of risk assessment and review of placements provides the basis for adopting measures that are suitable and sufficient for the level of risk. The alternative is to adopt a common approach where the same measures are taken for all placements. The problem with the latter approach, which was expounded by the 1997 guidance, is that it may be unnecessarily onerous for some placements while not being sufficiently robust to highlight and deal successfully with all cases.

It is recommended that the following six health and safety factors applicable to all placements are considered in the risk assessment and review process:

The six health and safety factors

- Work
- Travel and transportation
- Location and/or region
- General/environmental health
- Individual student
- Insurance limitations

These are described in greater detail in Section 8.3 below.

The risk assessment and review process involves considering the placement, the placement provider, and the specific student group in terms of each of the six factors in light of the HEI's existing risk management measures.

Guidance on assessing the level of risk associated with each factor is provided in Section 9 and Appendix A – Risk Profiling and Risk-Reducing Actions. The risk assessment form, provided in Appendix B, can be used to summarise and record the significant findings of the risk assessments, including the necessary actions and their satisfactory resolution. Examples of the type of actions which it may be appropriate to implement for each health and safety factor are provided in Appendix A. Completion of these actions should ensure that relevant control measures are in place. Once all necessary actions are signed off, the placement can be approved.

It is important to recognise that a factor may be assigned a high risk profile because there is lack of information about the issue and the measures that are in place. Once further information is obtained, it may be appropriate to downgrade the risk.

It is recommended that placement providers are reviewed annually taking into account feedback on any health and safety issues and their resolution.

The HEI's general guidance and control measures for student placements can also be reviewed to check that they are appropriate for the majority of the institution's placements. HEIs should have arrangements for collecting such information from students who have been out on placement and, where relevant, from visiting tutors or other sources.

8.3 Health and safety factors and control measures

Work factors:

These relate to the placement provider and to the work that the student will be carrying out. They include the nature of the work-based hazards to which the student may be exposed. Control measures may include the professional knowledge and expertise of the student.

Travel and transportation factors:

Driving and travel while carrying out the business of the placement provider can be a risk. Placements do not just involve the work carried out for the placement provider. Depending on the nature and location of the placement, the student may face significant health, safety and welfare issues associated with their travel to and from the placement and to and from their accommodation.

Location and/or region factors:

The location of the placement can have considerable impact particularly if it is abroad in a country that the student is not acquainted with, though it could apply to international students enrolled at a UK HEI and going on placement in the UK.

General/environmental health factors:

The student may face significant health, safety and welfare issues associated with the environmental conditions in their place of work or the general location, their accommodation, or their food and drink.

Individual student factors:

Each student is an individual. Their health; their knowledge, skills and experience; and their personality could have an impact on health and safety in particular environments.

Students with personal factors (e.g. health, disability, linguistic or cultural) which may require specific adjustments or support should have equivalent opportunities in choice of placements. HEIs should work with placement providers to ensure that access and support requirements will be provided for the student when on placement. HEIs should encourage students with a health condition or disability that may require adjustments or support whilst on placement to disclose this, or to agree for the HEI to disclose information on this when identifying possible providers. Advice on managing placements for disabled students is available in the DfES publication *Providing Work Placements for Disabled Students*¹.

Insurance limitations:

Insurance is a means of transferring risk by paying for the provision of professional support and financial recompense if things go wrong. Any assessment must include consideration of the extent and limitations of the insurance arrangements of both the HEI and the placement provider, the contractual arrangements in place and the legal requirements in the country or countries where the placement will take place. It is useful to distinguish between those issues that can be considered by the HEI generally and those issues that are specific to a particular placement. In that way appropriate insurance policy wordings can be put in place that would deal with most of the issues that may arise. The issue of insurance is explored further in Appendix C.

8.4 Processes for raising and resolving problems

The HEI and the placement provider should have processes by which students and tutors can raise concerns in order that these problems may be resolved.

The student should be encouraged to raise matters first with their workplace supervisor or the placement provider's health and safety contact. The student should also be informed as to what to report to the HEI and to whom and how.

The HEI's arrangements should include collection of feedback from students who have been out on placement, and where relevant from visiting tutors, on health and safety issues experienced during the placement and their resolution. This feedback will provide evidence that can be used to inform the annual review of the placement provider.

8.5 Planning for contingencies

The HEI should have contingency plans in case there are exceptional circumstances. This is particularly the case where the placement is abroad.

This may include providing students with a telephone number or email to contact in an emergency. Other relevant contingency plans may include measures for medical aid and possible repatriation following injury or illness and assistance in the case of loss of the student's property. Contingency arrangements need to be maintained while students to whom these arrangements apply are on placement. These contingencies can be covered by a suitable insurance policy (see Appendix C).

8.6 Ensuring each party understands their roles and responsibilities

There are three parties to any placement: the placement provider, the student, and the HEI. It is important that each party should have a clear understanding of their roles and responsibilities. It is important to have this captured in writing, shared between all three parties, and acknowledged (see Appendix D).

¹ *Providing Work Placements for Disabled Students*. A good practice guide for further and higher education institutions (DfES) available online at www.lifelonglearning.co.uk/placements/placeme1.pdf

This understanding can be achieved by exchange of written communication with the placement provider and with the student clarifying the arrangements and responsibilities with regard to health and safety for the student, the placement provider and the HEI. It is also useful if this written communication identifies the objective of the placement and other issues regarding conduct and learning outcomes, including whether there are more specific objectives from the perspective of any of the parties, such as relevant professional bodies and associations. General information about the (non-health and safety) content of such written communications is available in the ASET Code of Practice¹. The basic health and safety roles that should be incorporated into the written communications are set out in Appendix D. Additional roles should be incorporated depending on the conclusions of the risk assessment of the placement.

For French employers, *the Convention de Stage*, a particular Placement Agreement, is mandatory.

8.7 Preparing students

The student should be prepared as far as practically possible for their placement. In particular, the student should have information about relevant health and safety risk factors and control measures such that they are in a position to understand the risks to their health and safety and can make informed judgements. This is particularly the case where the student is considering or being offered a placement in a higher risk environment. Placements can be used to develop the student's ability to undertake their own risk assessments.

The HEI should provide students with information or direct them to sources of information relating to health and safety risk factors and control measures.

In order to be capable of working safely when on certain placements, it may be necessary for the student to have levels of technical and professional competency. Some placement providers may expect or require a placed student to have achieved levels of competencies before arrival. This is in effect what happens with medical students going on elective by which time such students will already have passed some clinical examinations so both school and placement provider can be assured that the student has some basic competences.

The same is likely to be the case for other professional posts such as in chemistry, life sciences, or engineering where the provider may expect or require that the HEI has trained and assessed certain competences relevant to health and safety.

In these cases it would be appropriate to incorporate in the written communication that the placement provider will inform the HEI of any basic competencies that they require a student to have attained or the HEI to have checked before placing the student.

8.8 Training of staff

Staff who are involved in organising and supporting student placements should be provided with guidance and training on the HEI's policies, and the arrangements and risk assessments and reviews that they must follow.

Visiting tutors can play a role with respect to health and safety issues. The role and experience (subject-based) required of visiting tutors is likely to be more significant for placements in high hazard work environments. The HEI should clarify any expectations of the visiting tutor(s) that arise from the risk assessment.

1. J. J. Wilson (ed.), A Good Practice Guide for Placement and Other Work-Based Learning Opportunities in Higher Education: Good Practice for Placements Guides – Volume 2 (ASET, 2009) - ISBN: 0-9542231-9-5

Part 2: Good practice guidance for placement organisers

9 Practical application of strategic framework

The following operational guidance has been developed as one possible way that the above strategic framework can be practically applied. This section should not be read in isolation. Practitioners need to consider the strategic context themselves and also check their institution's policies, procedures and guidance on student placements.

9.1 General introduction

Chronologically the placement process can be conveniently divided into distinct phases and processes (see the flowchart on page 13):

Before the placement:

- Step 1: Risk assess and determine control measures.
- Step 2: Prepare the student.
- Step 3: Approve the placement.

During the placement:

- Step 4: Deal with health and safety issues.

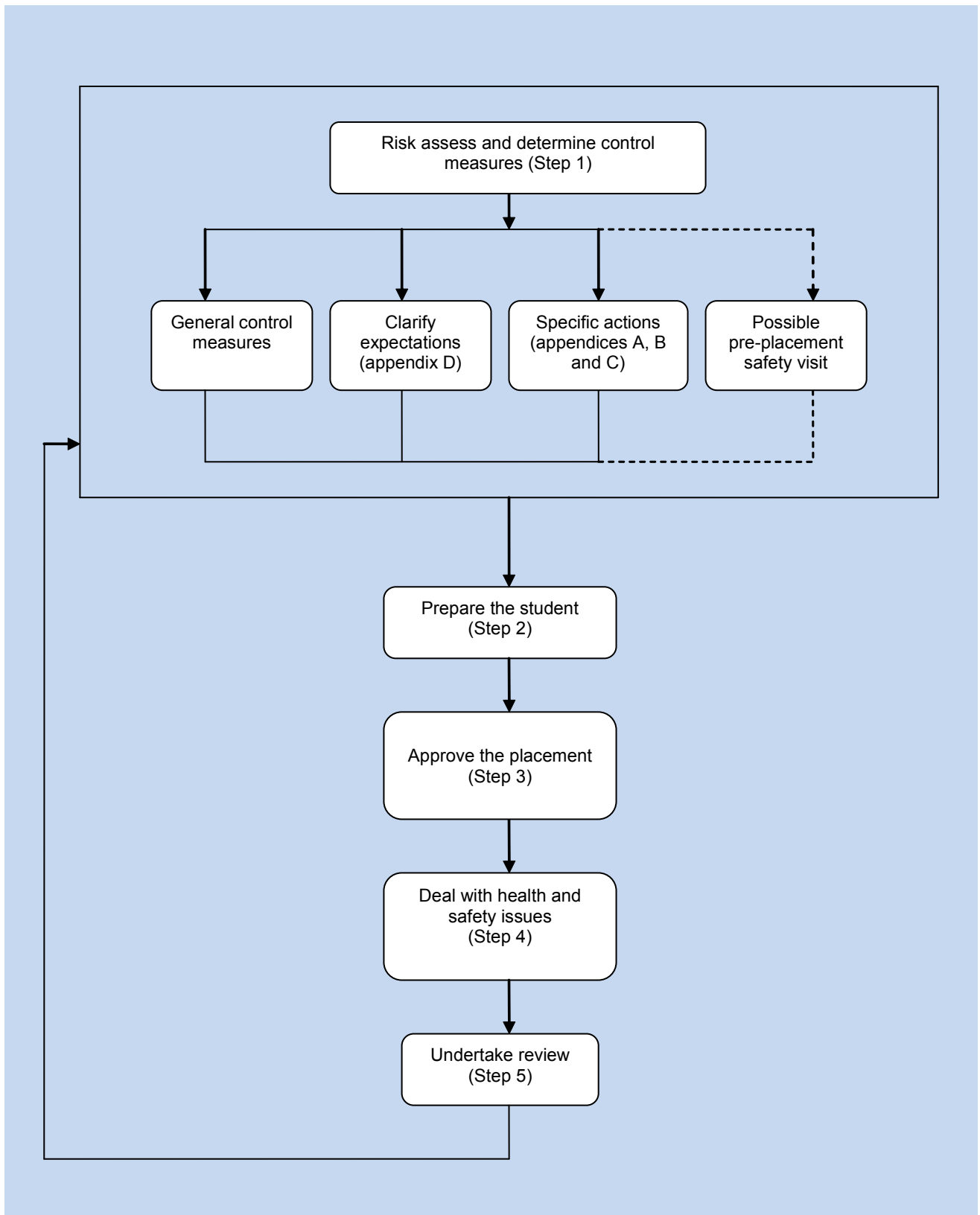
After the placement:

- Step 5: Undertake review.

Remember, although a risk-based approach requires you to make judgments, at times there may be no 'right' answer. The following process is designed to allow you to demonstrate that you have considered the issues and taken relevant actions.

It is important not to confuse 'risk' with 'hazard'. Hazard is the potential to cause harm, while risk is the likelihood or uncertainty of harm occurring. If some of the health and safety factors are judged to be high, it does not necessarily follow that the placement should not happen. It may simply mean that extra preparation is needed and/ or assurances sought.

Chronology of the placement process



9.2 Before the placement

Step 1: Risk assess and determine control measures

Risk assessment

You should use Appendices A and B to carry out and record your risk assessment. Using Appendix A you should judge the risk profile for the placement for each of the six factors and identify any specific actions that may be necessary. These actions should be recorded on the risk assessment form (Appendix B). The possible actions listed in Appendix A are only a guide. You are encouraged to develop and tailor Appendix A to address issues that could arise from the types of placement that your students may undertake.

The assessment form (Appendix B) includes checks on whether the general control measures are being applied.

You should attempt to develop groups of placements that have similar risk profiles. This will particularly assist you in determining what type and level of action you need to take with regard to briefings, written communications and pre-placement safety visits.

When producing risk assessments, it is appropriate to involve people with relevant knowledge, for instance of the practices and health and safety issues associated with the activities in which the students may be involved. This is particularly relevant in the case of placements with higher risk profiles.

You may also need to refer to the requirements of any relevant professional body in relation to professional practice obligations.

General control measures

You need to check that the following are in place for your students:

- A process by which the student can raise problems that they are experiencing and receive guidance and support on their resolution.
- A system for logging problems about health and safety raised by the student or visiting tutors and their resolution.
- Instructions for students on how to contact you or your colleagues in the event of an emergency.

Clarifying expectations with the placement provider

You must inform the placement provider of your expectations of them with regard to health and safety and raise any questions that you need answered in order for you to approve the placement. These expectations and questions should be set out in a written document at the outset of the relationship and before any student commences their placement. Appendix D contains a basic set of expectations and questions on health and safety issues that should be incorporated into these written communications. In addition you may need to include other questions arising from your risk assessment, for instance regarding insurance cover (see Appendix C), or information on residential accommodation if this is being provided by the placement provider. This document can be supplemented with other expectations regarding conduct and learning outcomes which can be found in the ASET Code of Practice and information from relevant professional bodies and associations. These written communications replace the questionnaires which have

been sent to placement providers in the past.

The placement provider must acknowledge in writing or electronically that they have received the written communication, accept its contents, and provide answers to any specific questions before the placement is due to commence.

Pre-placement health and safety visit

You need to decide whether a pre-placement safety visit is required before the placement can be approved. In most cases these are not required unless there are specific concerns that are best resolved by a visit and inspection. Examples of where this may be appropriate are noted in Appendix A. Pre-placement safety visits before approval of the placement are entirely separate from visits, which may contain a health and safety aspect, during the placement.

The DfES guidance Providing Work Placements for Disabled Students states that institutions may wish to visit the placement with the student or prepare the student for a meeting with the placement provider.

Step 2: Prepare the student

The student needs to be in a position to understand the risks and to make informed judgements.

You and the placement provider can help by providing general information about the placement, and information on the six health and safety factors to the student before the student accepts a placement. The student should be encouraged to seek out further information and to consider the risks associated not only with the placement provider but with the environment in which they will live and socialise.

| The six health and safety factors |
|---|
| <ul style="list-style-type: none">• Work• Travel and transportation• Location and/or region• General/environmental health• Individual student• Insurance limitations |

The amount of information (and possibly additional training) that the student will need in advance will depend on the extent to which the placement is unusual, complex, or involves significant risk.

In all cases the student should also be provided with the following information:

- Instructions about the general requirements and arrangements for the student to report any concerns about their health and safety while on placement.
- Extra information on any additional issues or concerns highlighted by the risk assessment.
- A copy of your expectations of the student, the placement provider, and your institution/department with regard to their specific placement (see Appendix D).

You should provide information in such a way that you can be satisfied that the student has received the information. Students are likely to find the information more interesting if it is delivered by tutors or students who have experience of the type of placement or of the placement provider. Depending on the risk profile it may be appropriate to test the student's understanding of essential information.

Means of communication with the student whilst on placement should be established. You should obtain from the student details of how they can be contacted and also next of kin contact details should there be an emergency.

Step 3: Approve placement

At this time, you should also review any information and past feedback your department/school may have had regarding that placement provider. If your students have previously been placed there, check to see that there were no health and safety concerns that remain unresolved.

When you are satisfied that the provider understands and accepts their roles and responsibilities, there are no unresolved concerns, and all the necessary actions have been completed, you are ready to approve the placement. All this information can be summarised in a Risk Assessment Form (see Appendix B) which you can use as the basis of your records for each student or student group.

9.3 During the placement

Step 4: Deal with health and safety issues

When the student is out on placement, responsibility for looking after their health and safety rests with the student and with the placement provider.

Students should raise any concerns in the first place with their workplace supervisor and then either through the management line or with the Health & Safety contact. If issues are not resolved, then the student should be able to raise the matter with you by whatever process you have established.

You may arrange for placement tutors, usually for academic assessment reasons, to visit the student at the placement provider's premises. These visits can also be used as one of the processes for assessing whether there are any health and safety issues. Placement tutors should be aware of their surroundings during these visits and raise any matters of concern that they observe with the placement provider. The level of expertise with regard to health and safety that may be expected of a placement tutor will vary depending on their experience, training and discipline. For example, subject-based experience is important for industrial and medical placements.

Suggested health and safety questions for visiting tutors are given in the table opposite:

| Area | Question | Action |
|-------------------------|--|---|
| General | How do you feel about the placement and your own wellbeing? | Raise with placement provider contact/manager. |
| Accidents and incidents | Have you had any accidents or witnessed any accidents or unsafe practices that you are concerned about? | Contact local competent health and safety person. Raise with placement provider contact/manager. Notify HEI health and safety department. |
| Training and induction | Did you receive any induction training? What ongoing training have you been given? | Raise with placement provider contact/manager. |
| Supervision | Have you been left in charge of a situation for which you felt you needed more training or closer supervision? | Raise with placement provider contact/manager. |

9.4 After the placement

Step 5: Undertake review

Initially and each year you should consider your portfolio of placement providers and identify any providers against whom students or visiting tutors have raised concerns about health and safety. You should review each placement provider by checking and recording any concerns that were investigated and either were not upheld or were accepted by the placement provider who took appropriate action to prevent recurrence. The conclusions of this review process should feed back in to inform future risk assessments regarding the approval of placement providers.

Part 3: Appendices

Appendix A: Risk profiling and risk reducing actions

| Factor | Risk profile | Indications | Possible specific action to reduce risk |
|-----------------------------------|--------------|--|--|
| Work factors | High | <p>Work with hazards that have potential to cause permanent injury or fatalities, including:</p> <ul style="list-style-type: none"> Construction site with work at height, dusts, moving machinery, electrical systems. Operation of machinery with mechanical hazards such as high speed rotating parts, crushing or entanglement risks. Laboratory work with toxic/hazardous materials. <p>Community work with known high risk groups of clients or locations (drug abusers, homeless, violent patients).</p> <p>Work with animal bedding or large or dangerous animals.</p> <p>Activities requiring specific licences or qualifications (e.g. diving, flying aircraft, crewing an aerial device).</p> <p>Work involving significant hazards in small companies that do not have professional health and safety advice.</p> | <p>Seek confirmation from placement provider about expectations of student's prior competency in high risk activities, and ensure student meets these.</p> <p>Confirm that training & supervision will be provided by the placement provider throughout the placement. Include in the written communication with the placement provider.</p> <p>Consider pre-placement site visit.</p> |
| | Medium | <p>Working in proximity to high risk factors (but not directly with them).</p> | <p>Seek confirmation from placement provider that the student will not be expected to participate in high risk activities, and will be appropriately supervised in medium risk activities. Include in the written communication with the placement provider.</p> |
| | Low | <p>Office work or other low hazard environments and activities.</p> | <p>None.</p> |
| Travel and transportation factors | High | <p>Significant travel to reach placement, prolonged or on local transport facilities known to be high risk (poor driving or vehicle safety standards).</p> <p>Demanding travel during placement.</p> <p>Student required to drive others in unfamiliar vehicles.</p> | <p>Brief student on travel arrangements, discuss implications with them.</p> <p>Consider their experience.</p> <p>Get confirmation from them that they have relevant driving licences and insurances.</p> <p>Consider reducing risks by providing accompanied travel where practicable.</p> <p>Specify regular contact times.</p> |
| | Medium | <p>Night travel.</p> <p>Long daily commuting requirement.</p> <p>Student required to drive familiar vehicle in reasonable conditions.</p> | <p>Brief student on travel arrangements. Confirm that these are acceptable to them.</p> <p>Advise them to check that they have the necessary driving licences and insurances.</p> |
| | Low | <p>No significant travel, comfortable daily commute.</p> <p>No driving associated with placement.</p> | <p>None.</p> |

| Factor | Risk profile | Indications | Possible specific action to reduce risk |
|---|---------------|---|--|
| Location and/or regional factors | High | <p>Significant risk of civil disorder, crime or similar danger (e.g. placement in war zones, countries where the Foreign and Commonwealth Office (FCO) advises against travel).</p> <p>Unavoidable lone or remote working in proximity to significant risk (e.g. medical student elective in a refugee camp).</p> <p>Medical and rescue services not available quickly or locally.</p> <p>Means of communication likely to be difficult or compromised.</p> | <p>Check Foreign and Commonwealth Office restrictions and recommendations.</p> <p>Consult guides on appropriate behaviour, clothing, etc.</p> <p>Arrange briefing/information to be provided in conjunction with someone with local experience or knowledge of conditions (e.g. student on previous placement or a placement practitioner at a local HEI in the overseas country).</p> |
| | Medium | <p>Higher than normal risk of civil disorder, crime or comparable danger.</p> <p>Delays likely in communicating with tutors and others.</p> <p>Placements abroad in areas identified as low risk by the FCO.</p> | <p>Check Foreign and Commonwealth Office restrictions and recommendations.</p> <p>Provide information to students on guides on appropriate behaviour, clothing, etc.</p> <p>Supplement general briefing with information about medium risk factors.</p> |
| | Low | Placements in the UK with no significant local risks. | None. |
| General/environmental health factors | | | |
| | High | <p>Regional/local health risks require mandatory and specific health protection measures e.g. inoculations.</p> <p>Very hot or strenuous working conditions (e.g. manual working outdoors in the sun).</p> <p>Very cold working conditions (e.g. catering placement in a food cold storage/cook chill or freeze facility).</p> | Consult occupational health or medical/health professional for advice regarding immunisations and other preparations. |
| | Medium | Regional/local conditions require some precautionary measures, e.g. optional inoculations against diseases, medical travel kit is a sensible precaution. | <p>Consult occupational health or medical/health professional for advice regarding immunisations and other preparations.</p> <p>A medical travel kit is a sensible precaution.</p> |
| | Low | No significant environmental health risks. | None. |

| Factor | Risk profile | Indications | Possible specific action to reduce risk |
|---|---------------|--|--|
| Individual student factors | High | <p>The student has personal factors (e.g. health, disability, linguistic or cultural) which may increase the risk of illness or accident during work-related activity even following adjustments.</p> <p>The student has personal factors (e.g. health, disability, pregnancy, linguistic or cultural) which may require specific adjustments or support if living away from home, or makes them susceptible to episodes of illness.</p> <p>The student's knowledge, understanding, and skills are low for the type of work.</p> | <p>Discuss activities of high risk with the student, try to eliminate or reduce them where possible.</p> <p>Engage with occupational health professional / disability support professionals to develop reasonable adjustments. Confirm these in the written communication with the placement provider.</p> <p>Consider pre-placement site visit.</p> |
| | Medium | <p>The student has personal factors (e.g. health, disability, pregnancy, linguistic or cultural) which may require specific adjustments or support during work, or in social interactions at work.</p> | <p>Engage with occupational health professional / disability support professionals to develop reasonable adjustments. Confirm these in the written communication with the placement provider.</p> |
| | Low | <p>The student has no long-term medical conditions or disability likely to cause episodes of illness or require specific support whilst on placement.</p> <p>Student has relevant knowledge, understanding and skills for the type of work.</p> | <p>None.</p> |
| Insurance limitations (see Appendix C for more detailed guidance) | High | <p>Locations, activities and/or circumstances that are excluded from the HEI's travel and other insurance cover.</p> <p>Locations where the placement provider's insurance does not cover the student for personal or third party liability associated with the work by the student.</p> | <p>If locations, activities and/or circumstances are excluded from the HEI's travel and other insurance cover, consider alternative placements.</p> <p>If placement is to proceed, additional specific insurances may be available.</p> <p>Consult the HEI's insurance specialist.</p> <p>Brief student on limitations of insurance cover (the small print).</p> |
| | Medium | <p>Locations, activities and/or circumstances that require prior acceptance from the HEI's insurers before being covered.</p> | <p>If locations, activities and/or circumstances require prior acceptance from the HEI's insurers, ensure notification and acceptance is given.</p> <p>Brief student on limitations of insurance cover (the small print).</p> |
| | Low | <p>Locations, activities and/or circumstances that are automatically included in the HEI's insurance cover.</p> <p>UK locations (where the placement provider must have employers' liability insurance cover).</p> | <p>None.</p> |

Appendix B: Risk assessment form

| Placement provider | | Student of student group | Start and end dates |
|--|------------------------------------|--------------------------|---------------------|
| Company: | | | |
| Location: | | | |
| 1. General control measures | | Action necessary? | Action completed? |
| Has the placement provider confirmed receipt and acceptance of your written communication? | Yes/No | | |
| Has this placement provider been used before and been reviewed with regard to health and safety? | Yes/No | | |
| If 'Yes', do any concerns remain unresolved? | Yes/No | | |
| Does the placement provider have a H&S advisor? | Yes/No | | |
| Has the student received sufficient briefing? | Yes/No | | |
| 2. Risk assessment and further specific actions necessary | | Action necessary? | Action completed? |
| | Risk profile (high, medium or low) | | |
| Work factors | | | |
| Travel and transportation factors | | | |
| Location and/or regional factors | | | |
| General/environmental health factors | | | |
| Individual student factors | | | |
| Insurance limitations | | | |
| 3. Conclusions | | Action necessary? | Action completed? |
| Is a site safety visit required before placement is approved? | Yes/No | | |
| Are the risks tolerable such that the placement can be approved? | Yes/No | | |

Prepared by:

Date:

Have the above actions being completed?

Yes / No

I (print name:

) approve this placement.

Signed:

Date:

Appendix C: Insurance

Insurance: General introduction

Insurance needs to be considered from the various perspectives of what could go wrong and who can be adversely affected. This section provides a brief summary of generally available insurance cover that is particularly relevant to student placements.

The need for the HEI or the student to provide specific insurance cover may vary depending on the nature of the placement and the insurance cover held by the placement provider. The cover available from the HEI's insurance will depend on the policy wording at each HEI. This is not set in stone and may be negotiable with insurers once an assessment has been made of the risks that require cover. Each HEI should involve its own insurance officer when seeking to develop its insurance cover and prepare its guidance for placements.

Where students are providing their own cover, they should be advised to check the wording, and particularly the exclusions, carefully to ensure that it meets their requirements.

There are aspects to consider, from both the HEI's perspective and that of the student, and depending on whether the placement is in the UK or overseas.

Cover for legal liability to the student

The HEI's own Public Liability Insurance should provide cover in respect of the HEI's own legal liability to its students (and to the placement provider). This insurance can normally be extended to provide an indemnity to students but the scope of this extension can vary – HEIs should check with their insurance officer. This means that the student (and the placement provider) can be assured that the HEI will have the resources to meet a legal claim from anyone who suffers as a result of something that is the fault of the institution. This insurance will not cover anything that is the legal liability or responsibility of someone else, and for placements in the UK it would be normal to expect the placement provider to have equivalent cover in place.

For work placements, the placement provider may have Employers' Liability (EL) or Workers' Compensation Insurance that will provide cover for the placement provider's liabilities to the student.

An important feature of this type of liability insurance is that payment of compensation will depend on the student establishing the legal liability of the HEI or placement provider. Although not a substitute for liability cover, personal accident insurance can provide 'no-fault' compensation in the event that the student suffers injury or death as the result of an accident, whether occurring as part of the placement or otherwise. This cover may be included with the travel insurance policy, or may be provided by the placement provider. However, few students are likely to have this type of cover whilst at their home institution.

Injuries to the student during the course of work on placement – UK placements

Within the United Kingdom the placement provider is responsible for the health and safety of the student whilst on placement as if the student were their employee¹.

Most employers are required to hold EL Insurance², and there is an agreement among the UK

¹ Health and Safety (Training for Employment) Regulations 1990.

² Employers' Liability (Compulsory Insurance) Act 1969.

insurance industry that work experience persons will be regarded as employees by all UK insurers and covered by EL policies.

Placement organisers should ask providers if they hold EL Insurance. 'No' answers will need to be referred to the HEI insurance officer with details of the placement.

Some employers are exempt from the compulsory insurance requirement. Notably these include Government bodies and family operations. Government departments may seek to contract out of their legal responsibility for the health and safety risk to placement students and transfer the risk (and the need for EL Insurance) to the HEI. Insurers may be prepared to cover these placements on an individual basis subject to prior notification.

Injuries to the student during the course of work on placement – international placements

When students are placed overseas the position becomes more complex. In France for example, placement students are subject to a *Convention de Stage* agreement under which they are regarded as employees and the placement provider generally accepts responsabilité civile for them under French law. However, some non-French organisations providing placement opportunities in France may refuse to accept this responsibility and attempt to transfer the risk to the HEI. Insurers can cover these placements on an individual basis subject to prior notification and depending on the contract terms.

Accordingly, placement organisers, when seeking information as regards a placement overseas should ask placements providers if their insurance covers liability for injuries or sickness suffered by placement students attributable to their duties with the organisation.

'No' answers will need to be referred to the HEI insurance officer with details of the placement. If there is no requirement in the country concerned for EL type insurance then the student needs to be aware they have no/little legal protection and be advised accordingly by the placement organiser. In such circumstances the student may want to take out accident insurance, but the HEI cannot offer advice about this¹. Most HEIs have their own personal accident travel insurance but this may be restricted to cover staff members only and not extend to students: the HEI insurance officer can advise on the extent of cover and exclusions.

A few countries may require EL type insurance (also known as Workers' Compensation Insurance) to be placed locally. A notable example is Australia. This is likely to be cost-prohibitive; so unless the placement provider can offer the necessary cover, or the Workers' Compensation bought/funded, the placement cannot go ahead.

Cover for the legal liability of the student

Students will not usually have Personal Liability Insurance except the very limited cover under a travel policy (which normally excludes liability arising from work) or if their parents have home contents insurance with a wide liability extension that includes family members normally resident at home. The best way of providing the cover is for the HEI to extend its own Public Liability policy to:

- i) Provide an indemnity to students;
- ii) Extend the personal liability overseas cover to indemnify students including whilst working.

Anyone driving a motor vehicle will normally require compulsory motor vehicle third party

¹ Most HEIs are not authorised to offer financial advice under the Financial Services Authority rules.

insurance, although this may be provided by the placement provider if the student is driving on the provider's business. Students driving their own vehicles or a relative's for work purposes need to check they have insurance that covers 'business purposes' and not just 'social domestic and pleasure' use of the vehicle.

Students' liability for Injuries and/or property damage that they may cause - UK placements

Within the UK, employers are vicariously responsible for the negligent acts of their employees including students on placement, if such acts cause injury to others. This liability will be covered by the placement provider's EL policy (see above).

Vicarious liability does not apply if the student acts in a wholly unpredictable and irresponsible manner, in which case the individual student may be held personally liable.

In most circumstances, as the provider is responsible for supervising the placement student during their duties, then there is no liability on the part of the student or the HEI in the event of damage to the provider's property or that of any third party where the student is working under the supervision of the provider. The only exception is where the student acts with deliberate malicious intent or in a wholly irresponsible way.

The HEI holds Public Liability ('third party') Insurance to indemnify the HEI in the eventuality that it is held legally liable for a student's actions (e.g. if an HEI tells a placement provider that a student has certain skills or training that they do not have) and such actions cause injury or property damage. This insurance may also indemnify the student in circumstances where the HEI would have been responsible had the case been brought against it rather than the individual student.

Such insurance will not indemnify students for the consequences of any deliberate malicious or irresponsible acts on their part.

Students' liability for injuries and/or property damage that they may cause – international placements

As the insurance situation is so variable overseas, the HEI insurance officer should advise on any Public Liability Insurance cover and exclusions for students during HEI authorised overseas placements.

However, such insurance will not indemnify students for the consequences of any deliberate malicious or irresponsible acts on their part.

Personal accident, travel and health insurance

Prompt response to most contingencies can be covered by an appropriate travel insurance policy. This could provide:

- Free emergency assistance and advice, and
- Insurance cover for:
 - Emergency medical expenditure (N.B. an emergency means anything that is unexpected (as opposed to regular treatment for an existing condition); it does not have to be a serious or life-threatening event).
 - Emergency repatriation expenses.
 - Loss of personal belongings, baggage and money.
 - Cancellation and curtailment costs.

- Personal liability.
- Legal expenses.
- Emergency evacuation expenses.
- Recreational activities (although specific hazardous activities may be excluded).
- Limited personal accident benefits.

The medical cover can be expected to exclude routine treatments and may limit cover for pre-existing conditions, pregnancy and childbirth. If this is a concern, the placement provider may have private health insurance that the student can buy locally.

Care must be taken when choosing an insurance policy to ensure that it provides adequate cover. Standard holiday travel cover is unlikely to be adequate. HEIs should consider whether to offer cover for their students under an appropriate commercial insurance policy. If so it is vital for the HEI to comply with FSA regulations, particularly if the insurance premium is to be recharged to students.

Students on overseas placements should be advised to take out appropriate and adequate insurance for personal activities i.e. extreme sports etc.

The extent of the travel insurance protection varies widely from one insurer to another and many policies contain small-print exclusions such as:

- Life-style exclusions (claims arising whilst under the influence of drugs/alcohol).
- Activity exclusions (excluding claims arising from 'dangerous' activities – the definition of 'dangerous' varies but may include motor cycling as well as winter sports, i.e. exclusions are not limited to just parachute or bungee jumping).

Some HEIs and other organisations in the USA insist that and require the student to pay for US medical healthcare insurance. Prices vary from institution to institution, but typically will not be less than \$500 (US).

Professional liability

General

Students training for a profession may be held legally liable for professional risks. Insurance for professional or business activities undertaken as part of the placement would normally be covered by professional indemnity insurance or in appropriate cases medical malpractice insurance. This can also be known as clinical negligence, or errors and omissions insurance.

The HEI's insurance would not normally cover students on work placements and the expectation would be for this to be covered by the placement provider, not least because only the placement provider is in a position to manage the professional or business activities of the student.

Medical and dental students

Students working within NHS hospitals in the UK are covered for professional risks under the Clinical Negligence Scheme for Trusts. The practice's medical malpractice cover should cover those placed with a GP practice in the UK.

If the placement is in a private hospital, hospice or nursing home, the placement organiser needs to ask the provider if their insurance covers the liability of the student for injuries to third parties, including clinical errors, or property damage arising from their duties within the organisation. If the

provider answers 'No' to this question, the placement should be referred to the HEI insurance officer for further advice.

The HEI should encourage medical and dental students to join a professional body (e.g. the MDU or MPS) that would provide discretionary medical malpractice benefits for their elective periods on request.

Placement providers overseas should be asked if their insurance cover liability incurred by the student for damage arising from their duties within the organisation. 'No' answers should be referred to the HEI insurance officer with full details of the placement, as the HEI's insurers may be prepared to cover these placements on an individual basis subject to prior notification.

Placement organisers seeking to place students in Australia should ask the provider if their insurance covers the liability of the student for injuries to third parties, including clinical errors, or property damage arising from their duties within the organisation. If the provider answers 'No' to this question, the placement cannot go ahead (see above).

Veterinary students

The BVA does not provide any veterinary malpractice cover for its members.

For placements with UK vets, it is probable that students will be automatically included under the provider's Veterinary (Mal) Practice Insurance.

Placement organisers should therefore ask providers if they hold Public Liability and Veterinary Practice Insurance and if the definition of employee in the policy include work experience trainees. 'No' answers should be referred to the insurance officer for advice.

Placement providers overseas should be asked if their insurance will cover liability incurred by the student for damage, including injury to any animal, arising from their duties within your organisation.

Due to insurance requirements in Australia it is not possible for students to be placed there unless the provider answers 'Yes'.

Veterinary students placed in USA may be able to purchase economical Veterinary Practice Insurance by joining SAVMA (www.avma.org/savma/about.asp).

Other 'No' answers should be referred to the insurance officer with full details of the placement as the HEI's insurers are prepared to cover these placements on an individual basis subject to prior notification.

Appendix D: Content of written communication

Purpose

The purpose of the written communication is:

- To clarify expectations with regard to health and safety related issues for the student, the placement provider and the HEI.
- To seek responses to specific questions raised by your risk assessment and control measures.

The following provides a basic set of roles and questions. It should be adapted to suit the circumstances of the placement and be based on risk assessment.

Arrangements and responsibilities

Of the HEI

to the student:

- Provide information to the student on general health and safety prior to their placement.
- Provide specialist advice and guidance for students with additional support needs.
- Where appropriate; appoint a visiting tutor(s) and establish the frequency of their visits.

Of the placement provider

to the student and HEI:

- Plan the work or study programme and associated health and safety training to be undertaken by the student.
- Provide the student with a full and clear induction to the organisation and its working practices, including health and safety arrangements, fire precautions and emergency evacuation arrangements, how to report accidents, incidents and unsafe conditions.
- Nominate a supervisor who will conduct or make arrangements for day-to-day supervision of the student including instruction regarding hazards and health and safety precautions.
- Comply with health and safety legislation.
- Define the liability and other insurance cover that will be provided by the placement provider for the activities of the student with regard to the student and to others who could be affected by the student's actions or inactions.
- Facilitate access to the student for visits by the visiting tutor.
- In cases of serious accidents or incidents involving the student or breaches of discipline by the student to advise and consult with specified contacts at the HEI.

Of the Student

to the placement provider:

- Abide by all rules regarding health and safety requirements, and other practices and procedures of the placement organisation.
- Carry out the work programme specified by the placement provider under the supervision of the specified supervisor(s).
- Inform the placement provider of any health concerns or disability that may require adjustments.
- Report any concerns about health and safety at their placement to their placement provider.

to the HEI:

- Attend briefing sessions and familiarise themselves with all information provided.
- Inform the HEI of any personal factors (e.g. health, disability, linguistic or cultural) that may affect the level of risk or may require adjustments.

- Consult with the HEI prior to seeking any changes in the terms and duration of the placement.
- Report any incidents in which they are involved and any health and safety concerns that are not addressed by their placement provider to their HEI.

Additional Questions:

- Confirmation of the acceptance the arrangements and responsibilities as set out above?
- Provision of the name and details of the nominated health and safety contacts.

Appendix E: Further information and acknowledgements

Further information

USHA and ASET also provide information on student placements:

Universities Safety and Health Association - www.usha.org.uk

ASET (The Work-Based and Placement Learning Association) www.asetonline.org/index.htm

Acknowledgements

UCEA would particularly like to thank the following individuals for their contributions to the drafting of this guidance: Iain MacKirdy (Director of Health and Safety, University of Warwick), Professor Bernard Weiss (Pro-Vice-Chancellor, University of Surrey), Alan Cowen, (Chair of USHA and Head of Health and Safety, University of Brighton), Elizabeth Aniteye (HEOPS and Student Occupational Health Nurse Adviser, University of Manchester), and Melanie Taylor (University Safety Advisor, University of Manchester).

UCEA would also like to acknowledge the contribution of the authors of the 1997 guidance. Documents developed by Darren Tidmarsh (University of Derby), Gary Tideswell (University of Leeds), Gary Wood (University of Huddersfield), Chris Richold (Leeds Metropolitan University), John Mellor (Nottingham Trent University), and Les Wright (Sheffield Hallam University) have been very important in furthering the debates. The insurance section of this document is adapted from the University of Bristol guidance Insurance for Placement Students written by Ginny Hope and was produced with the additional assistance of Martin Hampar (University of Manchester).

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