

University Policy on Placements

1 INTRODUCTION

The University of East Anglia recognises and values the importance of placement activities both academically and vocationally and is committed to maximizing the opportunities that its students have to benefit from such possibilities. This Policy sets out the various roles and responsibilities of the University, Placement Students and external Placement Providers in order to ensure that robust processes are in place both to secure the quality of the learning opportunities and to mitigate any risk. The Policy is applicable to all Undergraduate, Postgraduate Taught and Postgraduate Research programmes which include a placement component either in the UK or overseas.

The Policy is informed by and consistent with the Expectations and Indicators of Chapters B3 (*Learning and Teaching*), B4 (*Enabling Student Development and Achievement*) and B10 (*Managing Higher Education Provision with Others*) of the Quality Assurance Agency for Higher Education's *Quality Code for Higher Education* (2012).

Since the type and function of placement-learning varies widely across the University depending on the subject discipline and programme of study, the Policy constitutes a framework which outlines the minimum requirements in the development, delivery and monitoring that such learning opportunities must meet in order to safeguard the interests of the University, Placement Students and Placement Providers. Schools may choose to adopt more stringent conditions and, in some cases, the associated professional, statutory or regulatory body may require it.

The Policy is supported by University Guidance providing further explanation and examples of effective practice. Additional course-level information will be provided by Schools and, where relevant, the Study Abroad Office.

2 GENERAL PRINCIPLES

The University adopts the fundamental principles of good practice for placements outlined in the Work Based and Placement Learning Association's (ASET) *Good Practice Guide for Work Based and Placement Learning in Higher Education* (2013). This framework of principles recognises that placements are a three-way partnership between the University (in effect a School of Study), the Placement Student and the Placement Provider and that for the best outcomes each party should:

- (a) Accept and recognise the value to the Placement Student's employability attributes;
- (b) Be partners in planning and management;
- (c) Clearly understand the responsibilities and expectations of each party involved;

- (d) Collaborate to ensure opportunities are inclusive, safe and supported;
- (e) Engage in structured opportunities for learning and development;
- (f) Establish sustainable relationships and networks;
- (g) Record outcomes and evaluate feedback to enable continuous enhancement.

More specific responsibilities of each party are outlined in section 5.

3 DEFINITIONS

A **placement** is a period of academic or vocational activity, integral¹ to the student's course, where, whilst still enrolled at the University and subject to its regulations, the student is in an approved situation outside of their normal academic context either in the UK or overseas. A placement may be organised either by the University or the individual student; in all cases it needs to be approved by the relevant School.

For the purposes of this Policy, "placement (activity)" covers, but is not restricted to:

- (a) *Study Abroad*: programmes which include a semester or year abroad which typically, but not necessarily, involve an exchange with another academic or training institution;
- (b) *Work-based placements*: programmes which incorporate a period in a work organisation in either the UK or abroad. Work-based placements may be paid or unpaid;
- (c) *Professional experience placements*: programmes which include industrial, practice, clinical or other placements as part of requirements leading to professional qualifications;
- (d) *Fieldwork projects*: where these are managed by individuals or organisations external to the University.

The Policy is applicable where necessary to Degree Apprenticeship students where placements form part of the course.

The Policy is applicable to research degree students involved in formal collaborations with non-academic partners (broadly defined), as in the case of industrial studentships.

"Placement (activity)" will not normally refer to any extra-curricular activity, work experience (including internships)² or any other venture which is outside of the student's planned course even if the activity is relevant in some way to the

¹ "Integral" in this context refers to either a course or module requirement.

² "Internship" is here understood to refer to an extra-curricular developmental work-experience organised under the auspices of the University.

student's studies. While not covered by the Policy, the expectation is that such activities will be consistent with its ethos.

Although there is some variation in nomenclature across disciplines, for the purposes of the Policy the following terms are used to differentiate the various placement roles:

A **Placement Director** is an academic member(s) of staff, normally nominated by the Head of School in which the Placement Student is enrolled, who is responsible for ensuring the quality of the learning opportunities and the mitigation of any risk of the placement activities offered by the School including the establishment, delivery, organisation and provision of general oversight of the School's placement programme(s).

A **Placement Adviser** is any academic member of the School involved in the running and/or support of placement activities (such as Course Director, Module Organiser or academic Adviser).

A **Visiting Tutor** is a member of academic staff who visits a Placement Student at the premises of the Placement Provider during the placement activity.

A **Placement Student** is any student participating in a placement activity.

A **Placement Provider** is any third party providing or delivering the placement activity.

4 RISK MANAGEMENT

The University follows the recommendations outlined in the Universities Safety and Health Association's (USHA) *Guidance on Health and Safety of Placements for Higher Education Students* (2018). Given the diversity of placements, a risk-based approach is adopted entailing that the requirements of low-risk placements are minimised in order that resources may be concentrated on those placements likely to be of higher risk. The University may decide not to approve a placement based on risk.

The risk management framework is composed of the following mandatory components:

4.1 Review and approval of placements

The following risk factors are applicable to all placements and must be considered as part of the risk assessment process:

- (a) **Work factors:** These relate to the Placement Provider and to the work that the Placement 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 and the ethical approval process.

- (b) **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 Placement Student may face significant health, safety and welfare issues associated with their travel to and from the placement and to and from their accommodation.
- (c) **Location and/or regional factors:** The location of the placement can have considerable impact, particularly if it is abroad in a country that the Placement Student is not acquainted with, though it could apply to international students enrolled at UEA and going on placement within the UK. Initial checks will need to include the Foreign and Commonwealth Office website.
- (d) **Health and environmental 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.
- (e) **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. A Placement Student who has personal factors (e.g. health, disability, linguistic or cultural concerns) which may require specific adjustments or support should discuss this with their School as it may have implications for placement choice.
- (f) **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 the University 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 University generally and those that are specific to a particular placement.

4.2 Processes for raising and resolving problems

Both the University and the Placement Provider are required to have processes in place by which Placement Students and Placement Directors can raise their concerns in order that these may be appropriately addressed. The Placement Student should be encouraged to initially raise matters with their named contact at the Placement Provider. The Placement Student and the Placement Provider will also be informed about when, how and to whom to report their concerns to the University.

The School of Study should collect feedback from its Placement Students and, where relevant, from the Placement Director, Placement Advisers and/or Visiting Tutors, on any issues experienced during the placement and their resolution. This feedback will provide evidence that can be used to inform the School's annual review of the Placement Provider.

4.3 Planning for contingencies

Schools are required to have contingency plans to cover exceptional circumstances, especially where the placement is abroad. All students will be given the details of who to contact in their School in the case of an emergency. A list of all such contacts must be maintained by each School.

Students will also be provided with a University telephone number and/or email to contact in an emergency.

4.4 Ensuring each party understands their roles and responsibilities

The University through the relevant Placement Director, the Placement Student and the Placement Provider should all have a clear understanding of their roles and responsibilities with regards to health and safety. This must be stated in writing.

Roles and responsibilities are covered in greater detail in section 5, and written agreements in section 10.

4.5 Preparation of students

All Placement Students will be briefed before they go on placement and will be provided with information about relevant risk factors and control measures so that they are in a position to understand the risks to their health and safety and can make informed judgements whilst on their placement.

4.6 Training of staff

All staff involved in organising and supporting student placements should be provided with appropriate guidance and training by their School on the relevant University policies (most especially the Policy on Placements) 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 School of Study should clarify any expectations of the Visiting Tutor(s) that arise from the risk assessment.

Where practical a student on a placement should be visited at least once by an appropriate member of staff. Where a visit is not possible, alternative forms of direct communication should be used (e.g. telephone or web-based means).

5 RESPONSIBILITIES

A placement is a three-way partnership between the University (more particularly a School of Study), the Placement Student and the Placement Provider. Each of the partners has specific responsibilities which are outlined below.

5.1 Responsibilities of the School of Study

The School will ensure that:

- (a) There is sufficient resource in place to support the placements and that the members of staff overseeing the placements are appropriately qualified as outlined in section 4.6;
- (b) Placement opportunities meet the learning outcomes identified in the programme or module specification and are consistent with normal University practices and expectations;
- (c) Placement opportunities meet relevant requirements of any professional or accrediting bodies associated with the programme;
- (d) Where there is a requirement, ethical approval will be put in place;
- (e) Placement provision is, at a minimum, annually monitored and reviewed to enable continuous enhancement;
- (f) It has contingencies in place for students who are unable to obtain or attend a placement;
- (g) It keeps clear records relating to placements including a readily accessible record of all Placement Providers it has worked with;
- (h) No deadline for a credit-bearing assessment that is not associated with the placement activity should fall within the placement period, and any such deadlines following a period of placement activity should be set within a reasonable timeframe after the placement has ended;
- (i) It provides current documentation and relevant briefings for all Placement Students prior to placement including:
 - i. Information about relevant risk factors to their health and safety and control measures;
 - ii. Reporting mechanisms for raising concerns;
 - iii. Logistical requirements (for e.g., transport arrangements and travel times);
 - iv. Guidance and support on sourcing secondary accommodation;
 - v. Any known (additional) costs that may be incurred by the Placement Student whilst on placement;
- (j) It provides clear information to Placement Providers on their role and responsibilities;
- (k) It is transparent where any of the above activities are delegated to other services within the University, for example, the Study Abroad Office, the Postgraduate Research Service, the Learning and Teaching Service.

5.2 Responsibilities of the Placement Student

Placement Students are required to:

- (a) Read all placement information provided before the placement, engage with any briefing sessions and, where required, ensure that any necessary clearances and/or mandatory training have been satisfactorily undertaken;
- (b) Understand the learning outcomes of the placement;
- (c) Provide contact details whilst on placement;
- (d) Follow the policies and guidance of the Placement Provider relating to, for example, health and safety, research integrity, dress code, confidentiality requirements;
- (e) Be mindful of their own health and safety;
- (f) Be responsible for managing their conduct and behaviour;
- (g) During the placement engage fully with all placement activities;
- (h) Be responsive to the University's and the Placement Provider's requests for information;
- (i) Familiarise themselves with any reporting mechanisms and use these to record any concerns with the Placement Provider and/or School support as necessary. Placement Students should also ensure that the Placement Director is informed of any special circumstances which may be impacting on their performance;
- (j) Provide timely feedback on the placement when requested.

5.3 Responsibilities of the Placement Provider

Placement Providers are required to:

- (a) Have suitable health and safety arrangements in place;
- (b) Have suitable insurance in place to cover liabilities arising from the placement (see section 12);
- (c) Provide details of the work/study programme to be undertaken by the Placement Student;
- (d) Provide the Placement Student with a clear induction programme to the Provider's policies and working practices;
- (e) Provide the Placement Student with a named supervisor or mentor;
- (f) Facilitate, and where required participate in, any visits by Placement Director, Placement Adviser or Visiting Tutors;
- (g) Report to the Placement Director any concerns about the Placement Student;
- (h) Respond to any concerns raised by the Placement Director, Placement Adviser, Visiting Tutor and/or Placement Student;
- (i) Monitor the progress of the Placement Student as and where required to do so and provide feedback on the Placement Student's performance as requested;
- (j) Engage in assessment as and where required to do so;
- (k) If requested, provide an evaluation of the effectiveness and suitability of the placement itself.

6 COURSE AND MODULE APPROVAL

It is the School's responsibility, in liaison with the relevant University services, to ensure that all courses or modules that include a placement component are subject to appropriate approval processes.

Given the variety of placements, the practices and procedures contained in this Policy should be applied in a proportionate manner. It is the responsibility of individual Schools that the placements they offer adhere to the following general principles:

- (a) Placements should widen learning opportunities without prejudice either to the academic award being sought or the quality of what is being offered to the Placement Student. The University bears ultimate responsibility for the quality, academic standards and student experience of any placement;
- (b) The University has a duty of care to all students on placement and must ensure that informed decisions are made with respect to health and safety issues relating to the placement;
- (c) Placement Students remain registered at UEA whilst on placement and will receive ongoing support from the University as appropriate to their placement and course of study;
- (d) Placements will be relevant to and supplement and develop the academic and vocational skills and competencies consistent with the overall aims of the Placement Student's course of study;
- (e) The inclusion of placements within a course of study must be approved as part of the overall course approval process and must be monitored and reviewed as part of the University's usual monitoring and review processes to ensure the quality and enhancement of the student experience and the continued appropriateness of the placement;
- (f) The learning outcomes of any placement will be clearly identified and assessed appropriately by the relevant School;
- (g) The University cannot guarantee allocation to a particular Placement Provider;
- (h) Clear and timely information and guidance will be available to all those involved in a placement activity, including University staff, students and Placement Providers;

Schools will ensure that all relevant University policies and procedures dealing with complaints and Fitness to Study/Practice issues are available to all relevant parties.

7 MONITORING AND EVALUATION

All placements and courses and modules containing placements are subject to annual monitoring. As a minimum the following areas must be assessed:

- (a) That the University's Policy on Placements is being fully complied with;
- (b) Where relevant, that any additional requirements of Professional, Statutory or Regulatory Bodies are being met;

- (c) The appropriateness of the placement's educational aims, learning outcomes and modes of assessment.

To facilitate the review process the Placement Director will ensure that appropriate mechanisms are in place to seek and collate both formal and informal feedback from Placement Students, Placement Providers, Visiting Tutors and any other members of the University associated with the placement activity. Feedback from External Examiners should also be considered where relevant.

As part of any periodic review process, the course team will review the aims and learning outcomes of any placements to ensure that they remain appropriate. It may also be appropriate during such reviews to monitor success rates and, if possible, the effects on subsequent employment outcomes.

8 EQUAL OPPORTUNITIES

All placements are subject to the education and employment provisions of the Equality Act 2010 which offers protection from discrimination or victimisation with respect to nine protected characteristics (age; gender reassignment; being married or in a civil partnership; being pregnant or on maternity leave; disability; race including caste, colour, nationality, ethnic or national origin; religion or belief; sex; sexual orientation). In particular, it is the University's responsibility to ensure equality of access and opportunity through suitable placement provision for those Placement Students with protected characteristics. In some cases reasonable adjustments may be required in order not to put the Placement Student at a substantial disadvantage; these adjustments may include alternative ways in which the Placement Student may demonstrate that the learning outcomes of the placement have been achieved.

Placement Providers within the UK are also subject to the Equality Act 2010 and should be provided with information about individual Placement Students' requirements (with the Placement Student's explicit permission) in order to plan for their learning. Schools may need to work with the Student Support Service to identify any equipment and/or assistance that can be provided to help individual Placement Students with specific needs. Ultimately it is the School's responsibility on behalf of the University to protect all its Placement Students from discrimination and support maximum participation, and where this is not possible, the School may consider whether any relationship with the Placement Provider should be established.

It is recognised that a School may wish to establish placement opportunities in countries with very different legal and cultural frameworks from the UK. If there is believed to be a substantial risk of discrimination or victimisation of certain groups of Placement Students, the School should not consider allocating them to these placements. Schools will need to assess this issue carefully and ensure, wherever possible, that those barred in this way will still have equitable access to suitable placement opportunities considered as a whole.

9 APPROVAL OF PLACEMENT PROVIDERS

All Placement Providers should wherever possible be approved by the appropriate School in advance of the commencement of the placement. The University encourages Schools to visit potential Placement Providers in order to assist with evaluating their suitability; a visit will not always be necessary but should normally be conducted if there is doubt over the suitability of the provider.

In each case, the suitability of the Placement Provider will be assessed, taking into account risks. Schools should use a robust, fit-for-purpose procedure, proportionate to the complexity and nature of the activity and appropriate for their discipline. It is recognised that one procedure will not fit all types of placement. In each case, procedures must be clear, and visits or other forms of contact recorded.

International placements may carry greater risk. Schools will need to consider how to meaningfully assess the quality and risk of particular Placement Providers given that information and tools available in the UK (e.g. site visits) may not be practical in this context.

10 PLACEMENT AGREEMENT

The rights and responsibilities of each party to the placement (the School, the Placement Provider, and the Placement Student) will be clearly set out in writing. This agreement will be signed by an appropriate authority within the School and communicated to the Placement Provider before the start of the placement. The nature of the Placement Agreement may vary by School; a letter may be sufficient but Schools may wish to use more formal Agreements. The agreement will set out the minimum requirement for the placement and should be proportionate to the activity being undertaken.

11 TERMINATION OF PLACEMENT

If a placement is terminated prematurely, the terminating party must immediately inform the other parties. It is the responsibility of the relevant Course Director, in liaison with the Placement Director, to decide the possible outcomes and seek suitable remedies.

12 INSURANCE

Placement Directors will obtain confirmation of each Placements Provider's insurance; this to include:

- (a) Public Liability – limit of Indemnity (minimum £5,000,000);
- (b) Employer's Liability – limit of Indemnity (minimum £10,000,000);
- (c) Professional Indemnity – no recommended minimum.

The Placement Provider must provide confirmation that there is an equivalent policy or scheme in place which covers the Placement Student for the above. If the Placement Provider is unable to cover the Placement Student, or insists

that liability should be transferred back to the University, or does not respond appropriately when requested, UEA Insurance must be contacted for advice.

13 TIER 4 VISA STUDENTS

UK Visas and Immigration (UKVI) Sponsor Guidance states that an International student studying on a Tier 4 Visa can undertake a placement (including a placement abroad) providing it is an integral and assessed part of their course.

The Placement Director must ensure that current regulations are being followed prior to making any arrangements with a Placement Student who has a Tier 4 Visa and a Placement Provider. In such cases advice must be sought from the University's Student Visa Compliance Team. The Placement Director must not give visa advice to any Placement Student.

If a placement is an integral and assessed part of the course, this, together with an estimate of the percentage of the course that it represents, must be declared on the student's Confirmation of Acceptance of Studies (CAS) which is used by the student in making their visa application.

When a student undertakes a placement, the University is legally required to report to the UKVI the length of the placement and its precise location.

Tier 4 students are subject to attendance and engagement monitoring requirements whilst on placement. The School must ensure, therefore, that arrangements are in place to register and record attendance and that regular contact is maintained between the School and the Placement Student. There must also be a named contact at the Placement Provider to confirm that the Placement Student is attending and engaging with their placement.

14 APPEALS AND COMPLAINTS

All appeals and complaints with regard to student placements will be dealt with according to existing University procedures:

<https://portal.uea.ac.uk/learning-and-teaching/docs/appeals-complaints>

If the Placement Student has concerns about the standards of practice adopted by the Placement Provider, he or she should initially contact the Placement Director.

Before the commencement of the placement, Placement Students and Placement Providers must be given information about who to contact if they wish to make a complaint about any aspect of the placement. Records must be kept of all complaints and the follow-up action. These must be reviewed as part of the annual monitoring process.