Student Placements Policy

Scope

All taught and research programmes leading to an award of City, University of London.

This Policy will apply to partnership provision unless specific alternative arrangements have been agreed between City and the partner institution and included in the Memorandum of Agreement for the partnership.

The principles of this Policy will apply to validated provision. Specific arrangements for validated programmes will be approved at validation of the relevant programme and form part of the Validation Agreement.

Date approved/re-approved Approved July 2017

Date for review

To be reviewed on a periodic basis, with allowance for minor annual updates of roles and responsibilities by Education and Student Committee, as required

To be read in conjunction with

Forms for student placements:
  - Tri-party agreement (placements)
  - Placement Health and Safety Questionnaire
  - Short Term Placement Information Form
  - Overseas Work Placement Student Risk Assessment

Health and Safety Guidance Notes for Students on Placements
Student Placements Policy

1. Introduction
The University has made a strategic commitment to provide opportunities for students to undertake a work experience during their studies, either as a required or optional element of their programme. Such opportunities add enormous value to the student experience but must be managed within a robust framework to ensure the quality of the student experience and to satisfy the University’s duty of care for students.

This policy is informed by and aligns with the expectations of Chapter B10 of the UK Quality Code for Higher Education: Managing higher education provision with others. It has also been developed with reference to the ASET Good Practice Guide for Work Based and Placement Learning in Higher Education (2013) and the University Health and Safety Policy (including Safety Procedure No.13 Work Placements for Students).

2. Scope
This policy covers any work-based, employment or practical experience that is part of a student’s programme that fulfils stated learning outcomes and/or is recognised in any way on the University transcript or degree certificate. These learning outcomes may be specific (the development of specialist skills, for example) or more general (developing and understanding of the employment context, for example). Placements may be a required element of a programme or an optional extra and they may or may not be credit-bearing. Both placements organised by the University and placements organised by students to satisfy the requirements of their programme are within the scope of this policy.

The general principles of the policy apply to placements that are required by Professional Statutory and Regulatory Body requirements (specifically practice-based placements in the School of Health Sciences). However, the University recognises that processes may already exist or may need to be adapted to meet the specific requirements of professional bodies.

The policy is not intended to cover learning outside the University that is not a planned part of a programme such as part-time, term-time or holiday work/work experience that a student arranges for themselves. However, if a work experience opportunity is sourced, endorsed or recognised by the University (inclusion on the transcript, for example), the short term placement form should be used.

Additionally, this policy does not include students who have suspended their studies to undertake a period of time in employment.

3. General Principles
The purpose of this policy is to set out the principles and processes which apply to the development, delivery and monitoring of placement learning. Application of this framework ensures that the University will operate robust processes to ensure its ultimate responsibility for the quality of its educational offer. During a placement period, although the student is registered at the University
and remains subject to University regulations, direct supervision is transferred to a Placement Provider for a set period of time.

Therefore, the Placements Policy has three key objectives to:

- Preserve the University’s duty of care for students who undertake placements.
- Ensure that placement activity is appropriate, enriches the student experience and enables defined learning outcomes to be met.
- Provide a transparent and consistent framework for the approval, monitoring and review of placement activity.

4. Definition of terms

The following terms are used in this policy and its associated guidance. Specific role titles may differ from School to School, for example, in the School of Mathematics, Computer Science and Engineering placement activity is managed by a specialist team of professional staff. However, in all cases the responsibilities of each role will be clearly defined for students in an appropriate location:

- The **Placement Coordinator/Manager** refers to any person within the School responsible for the management of student placements.
- The **Placement Provider** is the host organisation providing the placement.
- **Placement students** are registered City students working under the supervision of a Placement Provider (usually) away from University premises.
- An **Academic Supervisor/Tutor** is any member of academic staff who visits a placement student and/or is responsible for a placement student.
- **Learning outcomes** describe what a student should be able to do or demonstrate in terms of knowledge, skills and attributes by the end of the module or programme.

5. Approval of Placement Activity

5.1 Programme Design

Placement activity must be an approved part of a programme. Proposals to incorporate these opportunities can be considered either through the University’s Stage 1 and Stage 2 approval procedures (for new provision) or through School-level procedures (for amendments to existing programmes of study). Opportunities to participate in placement schemes must be clearly indicated in Programme Specifications.

During the design and approval of programmes that incorporate placements it is required that proposals define:

- How placement learning contributes to the overall aims and learning outcomes of the award.
- Whether placements are mandatory or optional.
- Who is responsible for sourcing placements.
• How placement activity forms part of the assessment strategy for the module/programme and whether it will be credit bearing or non-credit bearing.
• The implications for students not securing a placement, not completing the placement or needing to change their placement.
• The capacity of the Programme Team (or other unit) to manage placement activity.

5.2 Approval of Placement Settings
Each placement setting must be approved as appropriate to meet the needs of the student and the requirements of this policy. The Tri-Party Agreement provides a template to ensure that all the relevant matters are considered in advance of students commencing a placement. For some programmes the requirements of placement settings are defined by the relevant PSRB.

An approved placement must provide the following:
• A defined role within an established organisation. ¹
• Clear opportunities for the learning outcomes to be achieved.
• A nominated supervisor and a commitment to regular supervision throughout the placement.
• Evidence of appropriate health and safety procedures in place and provision of training and briefing in relation to these.
• Adequate facilities and resources to support successful undertaking of the placement role.
• Opportunities to meet the requirements of PSRBs, where appropriate.
• Employers Liability insurance cover.

5.3 New Placement Providers
Placements can be sourced by the University or by students and they may be with employers that are well known or more unfamiliar. Arrangements for sourcing placement opportunities may differ between Schools; it will be made clear to students in their programme documentation how placements are arranged and who is responsible for sourcing them. In all cases, an appropriate level of check must be undertaken by the University before it can approve a student placement within that setting. The Tri-Party Agreement outlines questions that provide an appropriate due diligence process, however, for some programmes the due diligence processes may be determined by PSRB requirements.

5.4 Pre-placement Visits
The requirement for a pre-visit must be determined through the process of approval of placements settings; a pre-placement visit is not normally required unless there are specific concerns. The purpose of a pre-visit would be to assess the placement setting, discuss any concerns arising from the Placement Provider’s risk assessment of the role and to clarify understanding of arrangements for health and safety (using the criteria set out in the University’s Placement Health and Safety Questionnaire).

¹ Placements with start-ups and other newer businesses are not automatically excluded, but the University must be assured that all of the other criteria can be met.
5.5 Placements Abroad

There is a higher element of risk when students undertake a work placement abroad. When considering placements abroad, particular account should be taken of legislation appropriate to the country concerned and consideration of any particular risks associated with the specific region and location. The Placement Coordinator should explore both what health and safety procedures are in place and also what insurance might be provided by the Placement Provider to cover any illness or injury suffered by the placement student. Where satisfactory arrangements are not in place, students must be informed, in writing, of the risk that the placement carries and that the student may have little or no legal protection in the event of a workplace incident. If the student decides to progress the placement they should be advised to seek appropriate advice with regard to alternative insurance cover.

For student placements abroad the overseas work placement risk assessment form should be completed.

5.6 Short Term Placements

This policy is intended to be applied proportionately. Where a student is undertaking placement of less than 12 weeks and where that student is also studying one or modules concurrently with attendance at the University, the Short Term Placement form should be followed. This process should also be used for other work experience opportunities that are sourced, endorsed or recognised by the University, but are not credit bearing.

6. Student Support, Information and Guidance

Whilst on a placement students remain fully registered with City, University of London. The University will provide support to students through clear, comprehensive information and academic guidance before, during and after placements are undertaken. Briefing processes must include opportunities for students to discuss any aspect of their placement. An indicative outline of information that should be covered in student briefings and handbooks is provided in Appendix B.

The Programme (or School) must nominate both a ‘Placement Coordinator’ and an ‘Academic Supervisor’ (or equivalent) who will be responsible, with the Placement Provider, for the development of the Tri-Party Agreement (or equivalent agreement in the case of programmes subject to PSRB requirements) and for maintaining contact with the student during the placement. The specific responsibilities of the University, student and Placement Provider and key contacts for each are set out in the Tri-Party Agreement.

Visits to students on placement are encouraged, wherever possible, and are required for students who are on placement away from the University for a full semester or more.

7. Placement Places

Many placement places will be decided through a documented application and selection process. The processes for applying for placements must be communicated to students before they look for a placement and ideally included in programme specifications. In some Schools, SHS for example,
placements are allocated to students (other than elective placements). Where placements are allocated, fair and transparent procedures will be determined locally and communicated to students.

8. **Health, Safety and Welfare**

The University has a legal responsibility to ensure, so far as it is reasonably practical, that students are not exposed to risks to their health and safety. Specific details are set out in the University’s Health and Safety Policy (SP13 – Work Placements for Students). The Student Placements Policy and its associated pro formas ensure that the University meets its obligations in the operation of this activity. The University must make reasonable enquiries about arrangements for health and safety before a student begins any placement activity.

This duty of care covers all students whether placement opportunities are sourced by the University or the student. The Placement Coordinator (or equivalent) must ensure that the University’s Placement Learning Health and Safety Questionnaire is completed satisfactorily by the Placement Provider. A Placement Provider will only be required to complete one Placement Health and Safety Questionnaire, however, if placement roles and responsibilities vary significantly or if students are located on different sites then additional forms may be required (at the discretion of the Placement Coordinator).

The Placement Provider should also provide a copy of a placement risk assessment to the Placement Coordinator no more than 2 weeks after the placement has commenced, ideally sooner. A copy of the risk assessment and/or other relevant health and safety information must be provided to the student.

Where a Placement Provider has fewer than 5 employees, requirements for health and safety and risk assessment may be different. In these circumstances, the Placement Coordinator should undertake appropriate due diligence checks (Section 4 of the Tri Party Agreement) via a telephone conversation or in person and should record relevant information within the Tri Party Agreement form.

For some placements, PRSB or other organisation requirements mean that additional precautions must also be taken such as the completion of Disclosure and Barring Service check. These requirements will be set out locally.

The Academic Supervisor/Tutor, or other member of staff, visiting a student on placement is not expected to be an expert in health and safety matters, but they should be aware of, and understand their health and safety monitoring role. When visiting students on placement it will be necessary to observe the health and safety processes, discuss any concerns or incidents with students and take action that is considered necessary.

In the case of some international placements, where it is not possible for the University to confirm that satisfactory arrangements for health and safety are in place, students may continue with the placement but should note that they may have little or no legal protection in the event of a workplace incident. In such cases students should be advised to seek appropriate advice about alternative insurance cover.
All students and Placement Providers should be provided with sufficient advice about ensuring their health and safety in the workplace. The University’s briefing sheet ‘Health and Safety on Work Placement’ provides generic guidance.

9. Insurance
By completing the Placement Health and Safety Questionnaire, Placement Providers confirm that appropriate insurance is in place. It is not necessary for the University to retain copies of insurance certificates for Placement Providers.

For students on an approved placement in the UK or abroad, travel to and from the placement provider is covered under the terms of the University’s insurance.

Some placements may require additional professional indemnity insurance. Requirements for students will be clearly stated within placement information and arrangements for cover will be managed within Schools.

10. Working with Placement Providers
The University should provide adequate support to Placement Providers. The use of the Tri-Party Agreement helps to define the scope of the placement, the intended learning outcomes and the responsibilities of each party. Further information should also be provided and as a minimum this might include:

- General programme information.
- Processes for communicating issues with regard to student performance or other concerns.
- Expectations for when Academic Supervisors, or other staff, visit students on placement.
- Any requirements for recording student attendance.
- The extent and limitations of the student role, the level of skill and experience of the student.
- Suggestions for strategies that might be used to facilitate placement learning.
- University Health and Safety information.
- Full details of any training that is required to participate in the assessment of the student and the relevant Assessment Regulations, where appropriate.

11. Monitoring and Review

11.1 Monitoring Students
Schools must operate a process to ensure that they can monitor appropriately the location of all of their students. Programmes are expected to maintain records of where students are based on placement and to manage regular channels of communication. This is of particular importance for students that are undertaking year-long placements. Placement Providers must inform the Placement Coordinator if a student is unexpectedly absent from their placement for more than 48 hours without authorisation, or if they have any other concerns about the student’s attendance.
11.2 Requirements for Tier 4 Students

Where students are studying under a Tier 4 visa, the Home Office regulations require student attendance to be monitored at all times, including when on placement as the University continues to be responsible for its students. Schools must inform the University’s Visa Compliance Team of planned off-campus activity before it begins. Detailed procedures, including the Off Campus Activity Reporting Form, are detailed in the University’s procedures for Off Campus Attendance Monitoring. Changes to any off campus activity must be reported to the Visa Compliance Team. Placement Providers should be briefed by Placement Coordinators on any requirements to monitor attendance in line with this guidance and the correct procedures to follow if there are concerns about a student’s attendance.

11.3 Research Students

Research students who have a Tier 4 visa will be permitted to do a work placement provided that it is a formal part of the programme. The Associate Dean (Research) must confirm in writing to the International Visa Advice Team that the work placement is an integral part of the programme. The process outlined in 11.2 should be followed.

11.4 Student Feedback

Programmes will have arrangements in place for students to provide feedback on their experience during the placement and at the end; this might be through module evaluations, focus groups or other appropriate means. Feedback opportunities are important contact points and offer an opportunity for the University to address any concerns about the placement at an early stage. Issues that arise through student feedback must be considered at SSLCs, Programme Committees and/or other relevant committees and addressed. Actions should be incorporated in Programme Action Plans and reported back to students on placement. Feedback from the Placement Provider and from External Examiners, where they have had the opportunity to visit students on placement, should also be captured.

11.5 Annual and Periodic Review

Placement provision is subject to evaluation and review through the University’s procedures for Annual Programme Evaluation and Periodic Review. Appropriate reflection should be captured in all cases and the number of students involved in placements should be reflected within these documents. In particular, APEs should reflect on:

- The availability of suitable placements and the operation of the activity.
- The success of placements in enabling students to meet the objectives of the placement and/or to meet the learning objectives.
- The support provided to students by Placement Providers and the overall student experience.
- Student performance during placements and on their performance on their return to the University.
- Any identified good practice.

Matters that have arisen in placement activity should be addressed in a timely manner.
12. **Equality and Diversity**
It is the University’s intention to deliver opportunities that are open to all students. It is the responsibility of the student to declare at an early stage if they have any specific support or learning needs so that these can be considered and the ability of the Placement Provider to support those needs appropriately can be assessed. Reasonable adjustments in the context of a placement may differ from those in the academic setting. Arrangements will be considered on a case-by-case basis and any agreed reasonable adjustments must not compromise the achievement of learning outcomes or other requirements for educational standards or professional competencies that are required by PSRBs. Decisions on reasonable adjustments for placement students must be made with reference to other available guidance and information and in liaison with the Disability Support Team, as appropriate.

Any adjustments that are agreed must be captured in the Tri-Party Agreement.

Placement Coordinators must seek permission from students before disclosing information on disabilities or other protected characteristics to a Placement Provider.

13. **Early Termination of a Placement**
Regular communication is an essential factor in the management of placements. Both students and Placement Providers are reminded (via the Tri-Party Agreements) and other guidance of the need to inform the Placement Coordinator and/or the Academic Supervisor if there are any concerns so that an early resolution can be sought.

On rare occasions it may be necessary for the student or the Placement Provider to terminate the placement early. Terminating a placement could have serious implications for a student’s programme and for future relations with Placement Providers and these should be considered carefully.

In some cases, for any medical or personal reason, it may be necessary for the student to take a complete break from their studies, including the work placement. In such cases the Interruption of Studies Policy should be followed.

The Placement Coordinator should provide full guidance and support to students in these situations, enabling them to continue with their programme of study when appropriate. The University cannot guarantee that it will be able to provide an alternative placement (or access to the same placement) in all cases, however, the University will work with the student to identify alternative ways for the student to meet any required learning outcomes for their programme, where appropriate.

14. **Complaints About Placements**
A complaint that is raised by a student about the provision of a programme, including a work placement, may relate to:

i. matters falling under the authority of the University

ii. matters more properly falling under the procedures of the Placement Provider.
Complaints about placements will normally fall under the jurisdiction of the University and the Student Complaints Policy and procedures will apply. In the first instance, any complaint should be raised informally with Placement Coordinator in order that the student is directed to the correct procedure.
## Placements Typology

This typology provides guidance on the definitions of types of placement and the associated approval processes, which are proportionate to the nature of the placement. This typology is not exhaustive and does not preclude other types of placements being established under the arrangements for approval set out in the Student Placements policy.

<table>
<thead>
<tr>
<th>Type of placement</th>
<th>Description</th>
<th>Approval Processes</th>
</tr>
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<tbody>
<tr>
<td>Company visits, insight days, observational placements/shadowing</td>
<td>Short-term, supervised activity often as an enrichment activity for student. Rarely any specific learning outcomes attached. Students will not have responsibility for undertaking specific tasks within the organisation.</td>
<td>None required. Student feedback may be sought to support the delivery of future opportunities.</td>
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<tr>
<td>Internships, micro placements</td>
<td>Internships and micro placements are structured periods of work experience. Opportunities may often be in a profession/industry related to the programme of study, but the placement is not a formal requirement of the award. Internships are often undertaken during the summer holiday period.</td>
<td>Where the University has sourced and promoted the opportunity, the Short Term Placement form should be used to capture the required level of due diligence. Student feedback on the experience should be sought. Where the student has sourced the opportunity: Where possible, students should be provided with the standard health and safety briefing/information.</td>
</tr>
<tr>
<td>Practice placements</td>
<td>Governed by a formal agreement between the University and employers, these placements are usually undertaken on programmes where qualification leads to a licence to practice, such as in SHS.</td>
<td>Arrangements for placement learning (including assessment) are captured as part of the Programme Approval Process and are reviewed via student feedback mechanisms, APE and Period Review. Formal processes for approving</td>
</tr>
</tbody>
</table>
Students may often do multiple practice placements as part of their programme of study and employers may be involved in the assessment of students.

Providers and placement opportunities are determined by the PSRB (in liaison with the Department) in order that placements are appropriate for the needs of the qualification. Where this is the case, these requirements supersede the specific requirements of the University policy.

Employers are adequately informed and prepared to undertake their role in the assessment of students.

Students may require additional checks (e.g. DBS) in order to undertake the placement.

Workplace visits should be undertaken on a periodic basis.

<table>
<thead>
<tr>
<th>Projects</th>
<th>Negotiated periods of work undertaking specific tasks for an employer. Projects can be of various lengths, but they are normally additional to the student’s module diet.</th>
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<tbody>
<tr>
<td></td>
<td>Where the University has sourced and promoted the opportunity, the Short Term Placement form should be used to capture the required level of due diligence.</td>
</tr>
<tr>
<td></td>
<td>Where the student has sourced the project opportunity: Where possible, students should be provided with the standard health and safety briefing/information.</td>
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</tbody>
</table>

| Term Placements | Placements of 12-15 weeks (full-time). The student remains fully registered with the University and there are learning outcomes attached to the experience. The placement is a recognised part of the programme, usually through Arrangements for placement learning (including assessment) are captured as part of the Programme Approval Process and are reviewed via student feedback mechanisms, APE and Period Review. |
| Sandwich/Industrial Placements | Usually 30-52 weeks in length, this is a period of learning that takes place away from the University setting. The student remains fully registered with the University and there are learning outcomes attached to the experience. The placement is a recognised part of the programme either through the application of credit or through recognition on the transcript or award certificate. | Arrangements for placement learning (including any required assessment elements) are captured as part of the Programme Approval Process and are reviewed via student feedback mechanisms, APE and Period Review. The requirements of the policy for the approval of the placement provider/placement opportunity apply in full. Work place visits should be undertaken during the placement. The Tri Party Agreement will provide further information. |
| Work based learning | The student primary role might be considered to be that of employee and they are based in the work setting for the majority of their time. The employment settings the contextual focus for learning throughout the degree. | Arrangements agreed during the programme design and programme approval processes. Review via APE and Periodic Review. Students undertake module evaluations and will be invited to take part in relevant student surveys. |

[Definitions are based on the ASET Good Practice Guide for Work based and Placement Learning in Higher Education]
Student Support and Guidance: Areas to Cover in Pre-Placement Briefings

Schools and Departments may have different ways of approaching a pre-placement briefing of students. A full and considered information session is important for a successful placement experience. The following is an indicative list of subjects that pre-placement briefing should cover:

- Any academic requirements for the placement (a reminder of formal learning outcomes, assessment requirements etc.). Where there are no specific academic requirements, an indication of the experiential benefits of the placement experience can be very useful.

- A reminder of the purpose and benefits of undertaking a work placement.

- Arrangements for placement visits and other contact points, including expectations for maintaining contact with the University/Department and how this will happen (phone, emails, log-ins etc.).

- Support available to the student whilst on placement (e.g. on-going access to University services as well as Departmental contact, Students’ Union membership).

- Health and Safety - general briefing to reinforce information provided in the generic University guidance. Coverage of any specific matters of relevance to placements in particular professions (e.g. engineering, health).

- Information about the requirements of the Data Protection Act and client/patient confidentiality.

- Support with assessing any personal risk factors that students should consider. This might include supporting students to think in advance about travel to the placement location, late working, accommodation during the placement period etc.

- Placement paperwork, including the requirements and the responsibilities of each party.

- Any relevant financial information – fees that must be paid, professional fees or additional insurance that might be required, loans and sources of other funding (if relevant).

- What to do in the event of an emergency and if things are not going as planned whilst a student is on placement.

- What will happen when a student completes the placement and returns to University (e.g. requirements for module selection for the following year).

- Advice on workplace etiquette – professional/corporate culture, dress code expectations and other relevant advice to support student success.

- Any other tips for making the most of the placement experience.

Opportunities to ask questions of staff and ideally of other students who have undertaken placements.