

USHA

Universities
Safety and Health
Association

Guidance on Health and Safety of Placements

for Higher Education Students

supporting
partners



HEOPS



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FOREWORD

One of the key expectations expressed by students in higher education today is that they should be equipped to successfully and rapidly transition into employment upon graduation. Developing the employability of students is threaded through the mission of most universities. A very important method of bringing this to life during study is through experiences in the workplace, such as placements.

This document provides guidance to institutions on those health and safety considerations which need to be managed as part of holistic approval and support processes. As the models adopted to offer placements vary by HEI and between disciplines, this document gives a framework which may be adapted to most situations.

A healthy and safe environment is an important part of any work and study place, regardless of where that may be. Students are an essential and core part of our institutions so we need to do everything reasonably possible to ensure that they are enabled to maximize their potential by supporting them in the right way.

Placements are an important aspect of the student experience but can potentially pose a significant risk to higher education institutions. This guidance recognizes the value of placements but also the risks that they might pose. The framework within this document

This document updates the 2009 edition and retains the risk-based approach and reflects the increasing diversity in placement activity. It also emphasises the value in supporting students to learn to assess and manage risk for themselves as part of their development.

I strongly recommend institutions should review their procedures and consider the adoption of this guidance. It is of particular relevance to those responsible for student regulations and for managing student placements in your institution, including the registry function, placement organisers, visiting tutors and health and safety professionals and is a means of managing the risk to students.

Ian Dunn
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enables a sensible approach to be taken to minimize risk and which acknowledges the diverse range of placements taking place.

I would personally like to thank those who have contributed to the production of this guidance and hope that you all find it extremely useful. USHA are very proud to present this document to the sector.

Cathy Day
Chair of USHA
Director Health, Safety & Risk –
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GLOSSARY OF TERMS

Placement:

The term 'placement' is one of several terms used within HEIs to refer to accredited work experiences (e.g. internship, professional practice). This term is used in this document to refer to any period of work experience, paid or unpaid:

- Which is offered by an HEI 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 or to the student themselves if acting in a self-employed capacity.

There are other work experience related activities that occur within HEIs which may not fall within this definition (e.g. volunteering activities, work experiences facilitated or recorded but not accredited by the HEI as part of a student's studies). Consideration should be given to the level of control the HEI has over the activity and their level of responsibility for health and safety in these cases as in some instances it may be appropriate to adopt the principles of risk management outlined in this document.

HEI:

Higher Education Institution, i.e. an institution that has students enrolled 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.

EXECUTIVE SUMMARY

This sector guidance provides a strategic and generic framework for the pragmatic 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.
- The placement provider has primary responsibility for the health and safety of students under their supervision and should be managing any placement associated risks.

This guidance encourages a risk-based 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 academic activities, 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.

Universities are recommended to take note of this guidance and consider and implement it as appropriate to their HEI. This should include ensuring staff involved in organising placements are provided with guidance and training on the policies and arrangements that they must follow, and sufficient resource for their implementation.

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.

The guidance is formed of two parts: part one outlines the strategic framework HEIs should have in place to manage placement risks and part two gives operational detail for placement organisers. Both sections are supported by a toolbox on the USHA website which includes examples and templates provided by a number of HEIs to indicate the range of implementation options available.

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.

This document refers solely to the health and safety considerations which should be included in wider placement approval processes. It is expected that HEIs will adapt processes to suit their organisational structures and where practical include health and safety aspects along with academic, business case and procedural authorisation processes.

PART 1: STRATEGIC FRAMEWORK

A. Risks and liabilities

Guidance from the funding boards 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 etc. 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 etc. 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 etc. 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 etc. Act 1974) for non-employees.

Implementation of this guidance may 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. HEIs should ensure that any activities they undertake to encourage students to participate in professional experiences or volunteering could not be perceived to have been endorsed or approved by the organisation if they are only signposting opportunities, and have not undertaken any due diligence activity.

B. 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.

C. Risk management approach

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.

Practical guidance on the application of this approach by placement organisers is provided in section 2B which should be read in conjunction with Appendices A to D.

1. Planning and organisation arrangements

The HEI should document how student placements will be managed including clearly defined roles, responsibilities and approval

procedures appropriate to the range of placements being organised at HEI and local levels. This should include a mechanism for escalation of approval where necessary and should preferably be part of the HEI's overall academic guidance or regulations on student placements.

2. Review and approval of placements

It is recommended that HEIs adopt a risk assessment and review process for student placements which provides the basis for adopting measures that are suitable and sufficient for the level of risk.

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 FACTORS:

Work

Travel and transportation

Location and region

Health and environment

Individual student

Insurance limitations

These are described in greater detail in section 2B. 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.

Detail on assessing the level of risk associated with each factor is provided in Section 9 and Appendix A – Risk Profiling and Risk-Reducing Actions. This can be implemented through a staged approach. An initial assessment of risk through an information gathering stage and confirmation of general control measures is acceptable for lower risk placements, whereas higher risk placements or those with inadequate information would require a more detailed risk assessment to be undertaken. The staged approach has been included in the 2018 revision of the guidance in recognition

that the level of risk involved in a significant proportion of modern placements does not warrant a detailed risk assessment. A system of recording the risk evaluation and approval process should be implemented, further detail is given in section 9 and examples of suitable forms are included in the toolbox.

Appendix A also gives examples of the type of actions which it may be appropriate to implement for each health and safety factor. Completion of these actions should ensure that relevant control measures are in place. Once all necessary actions have been taken, the placement can be approved.

HEIs should have arrangements for ensuring information about any significant health and safety issues is obtained from students who have been out on placement and, where relevant, from visiting staff or other sources. This information should be used to ensure such issues are resolved prior to future placements being approved. It is best practice to have a mechanism for sharing information about providers across the HEI.

It may not be necessary to repeat the full risk assessment process every time a student goes on placement, so long as each student's needs are evaluated and there are no significant differences to previous placements. HEIs should determine appropriate intervals for review of risk assessments based on the risk level of the placements and their experience of providers. If any significant unresolved issues from any previous placements exist the process should be repeated before further placements proceed.

The HEI's general guidance and control measures for student placements should also be periodically reviewed to check that they are appropriate for the majority of the institution's placements.

3. 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.

This understanding can be achieved by exchange of written communication with the placement provider and with the student, which will clarify 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 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. The basic health and safety roles that should be incorporated into the written communications are set out in example documents included in the toolbox.

4. 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, procedures, arrangements and risk assessments that they must follow.

University staff who visit students on placement should play a role with respect to health and safety issues. The role and experience (subject-based) required of visiting staff is likely to be more significant for placements in high hazard work environments. The HEI should clarify any expectations of visiting staff that arise from the risk assessment.

5. Preparing students

The student should be prepared as far as reasonably practicable for their placement. The student should have information about relevant health and safety risk factors and control measures such as those detailed in Appendix A, so they understand the risks to their health and safety and can make informed judgements. This is particularly important where the student is considering a placement in a higher risk environment.

The HEI should provide students with information or direct them to sources of information relating to health and safety risk factors and control measures. The students should also be encouraged to research the location they will be living and working in.

Placements are an opportunity to develop the student's ability to undertake their own pre-placement risk assessments. In such instances, students must be given suitable and sufficient information, training and instruction and the HEI has responsibility for approving the student's assessments.

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 confirmed before placing the student.

A method and frequency for the student to maintain contact with the HEI should be agreed, taking into account the duration, risk level and available communication methods.

6. Processes for maintaining contact and resolving problems

There should be pre-determined contact plans and defined trigger points/process for escalation if the pre-agreed regular contact is not made. In addition to this regular contact

process, the HEI and the placement provider should have processes by which concerns can be raised and 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, 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 staff, on health and safety issues experienced during the placement and their resolution. Any health and safety issues should be recorded so they can be resolved prior to any future placements.

7. 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. The HEI should know the placement location of its students and have a method to communicate with them promptly in an emergency.

Students should be provided with a 24/7 telephone number to contact the HEI in an emergency. They should also be advised to ensure they carry details of local emergency contacts and, if abroad, their travel insurer, local emergency services and their local embassy / consulate.

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. Some of these contingencies can be covered by a suitable insurance policy.

PART 2: GOOD PRACTICE GUIDANCE FOR PLACEMENT ORGANISERS

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.

A. General introduction

Chronologically the placement process can be conveniently divided into distinct phases and processes:

Before the placement:

- Step 1: Categorise risk level.
- Step 2: Clarify expectations with provider.
- Step 3: Carry out detailed risk assessment (where required).

Step 4: Prepare the student.

Step 5: Record findings and approve the placement.

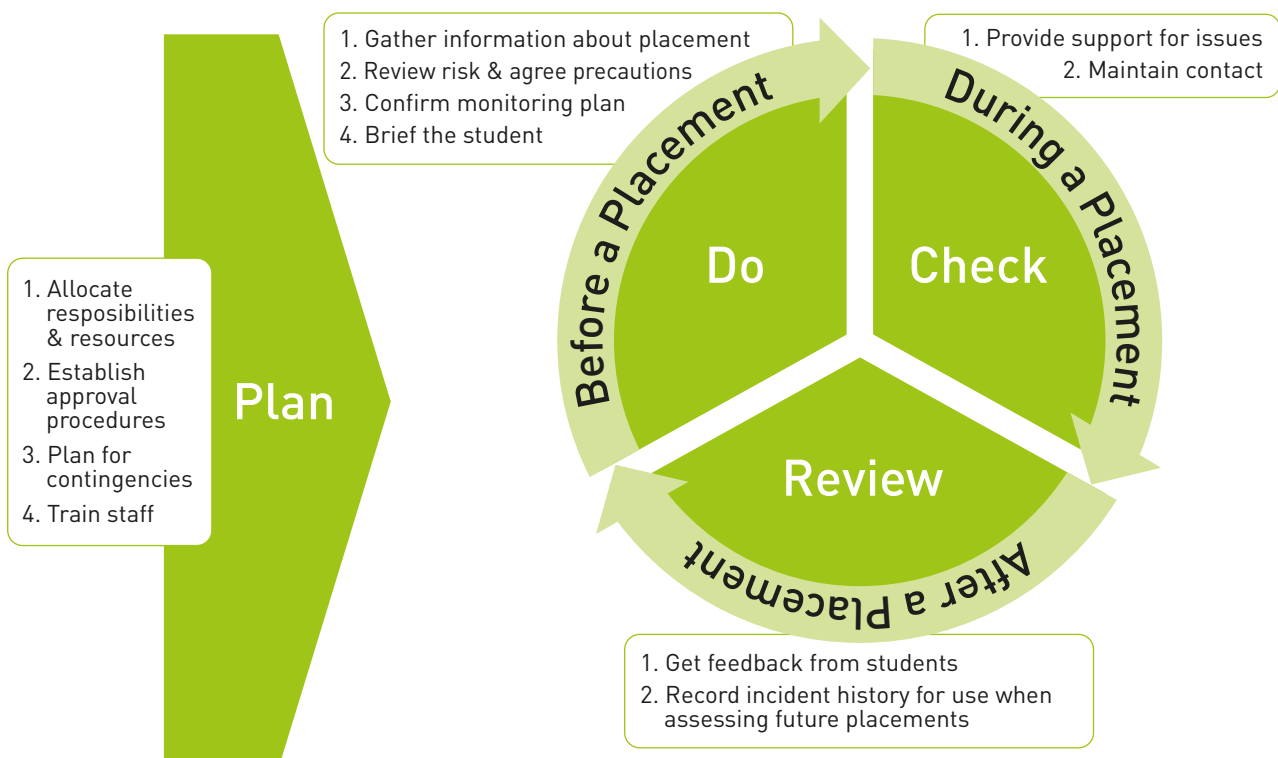
During the placement:

Step 6: Monitor placement and resolve any health and safety issues.

After the placement:

Step 7: Undertake review.

The figure below summarises the overall process flow for the placement process. It is recommended that HEIs develop more detailed process charts of their own procedures to support their placement staff in understanding and implementing the process. There are examples of institutional process charts within the toolbox.



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 appropriate actions.

Evaluating the risk associated with a placement will help determine what type and level of action you need to take with regard to student briefings, written communications and pre-placement safety visits. Higher risk levels warrant greater resource to ensure any risks are reduced (e.g. 1:1 student briefing for a high risk whereas low risk could be provided with generic briefing information).

It is important not to confuse 'risk' with 'hazard'. Hazard is the potential to cause harm, while risk is the likelihood or chances 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.

It is acceptable to group placements that have similar risk profiles for approval processes, e.g. multiple placements with the same provider. It may also be possible to embed necessary elements within placement agreements from large placement providers e.g. NHS.

Step 1. Categorise risk level

Sufficient information about the placement and the student should be gathered to enable the risk level to be categorized using each of the six factors shown in appendix A.

THE SIX FACTORS:

Work
 Travel and transportation
 Location and region
 Health and environment
 Individual student
 Insurance limitations

Where the initial information gathering indicates a placement could potentially be classed as high risk in any of the six categories, a detailed risk assessment should be undertaken. Examples of risk categorisation processes and forms are included within the toolbox materials. Where any category has medium risks, appendix A indicates additional content that should be included within step four: preparing the student.

There should be some general control measures within placement management procedures. This stage should verify they are in place for your students:

- A means of maintaining contact with the student and process by which the student can raise any problems 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 staff and their resolution.
- Instructions for students on how to contact you or your colleagues in the event of an emergency.
- A process to hold information about placement locations and student contact details whilst on placement.

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.

There may be occasions where a student may undertake a self-employed placement. This should only be adopted where it is academically/professionally appropriate and not to circumvent usual placement requirements, and careful consideration should be given to the risk levels involved in the work activity.

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 if it is in a region the student is not acquainted with, especially in regions with increased or atypical risks. A student returning to their home country for their placement may provide some mitigation from risks, but risk assessment will still be required as it may not mitigate all risks, for example there may be regional differences in risk or elevated risks from association with the HEI or provider.

For placements abroad, country or region competent advice should be sought, for example from the Foreign and Commonwealth Office or the HEI's third party specialist advisory service. For international students it may be appropriate to refer to advice provided by their own government's advisory service if available.

Authorisation for placements in very high risk locations (e.g. where there are travel advisories in place) may require reference to the HEI's processes and escalation mechanism for high risk travel.

Health & 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.

Individual student factors:

Each student is an individual. Factors to consider include their physical and mental 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. physical and mental 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, disability or other protected characteristic 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 students with protected characteristics is available in appendix B.

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 HEI, placement provider and student, the contractual arrangements in place and the legal requirements in the country or countries where the placement will take place.

The HEI should ensure clear guidance is given to placement organisers on the detail of insurance policies held by the institution along with any key exclusions and guidance about when placements should be declined if cover is not available (e.g. where employers &/or public liability cover or travel insurance is not in place). The issue of insurance is explored further in appendix C.

Step 2: Clarify 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. The provider should give written

acknowledgment of their acceptance of these at the outset of the relationship and before any student commences their placement. To reduce bureaucracy this can be included in general placement acceptance communications (see example in toolbox).

The toolkit also contains a document outlining the basic set of expectations and questions on health and safety issues that should be incorporated into these written communications. This document can be supplemented with other expectations regarding conduct and learning outcomes and information from relevant professional bodies and associations if required.

Where international regulatory frameworks and insurance requirements differ from the UK, the implications of this should be considered whilst evaluating risk levels and the student should be briefed accordingly.

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. Where this is not the case a decision should be made about whether to proceed based upon both the available knowledge about the provider and the considered reason for the non-response. For example is the non-response due to an administrative failure, or is it an indication the conditions outlined in the written communication are not in place.

If the placement is a repeat, ensure any health and safety concerns raised during previous placements were resolved or are unlikely to recur.

Step 3: Carry out a detailed risk assessment

Where any of the six risk levels are categorised as high, or there is insufficient information to categorise risk level, a more detailed assessment should be carried out using appendix A to identify any additional actions that may be necessary to control risk sufficiently for the placement to be approved.

Further information is likely to be required from the placement provider and/or the student and may require reference to HEI escalation process for approval. The possible actions listed in appendix A are only a guide, you are encouraged to develop and tailor your approach to address issues that could arise from the types of placement that your students may undertake.

The risk assessment process should not extend as far as reviewing providers own risk assessments for work activities as you are unlikely to have the knowledge required to fully evaluate it and it could give the impression the HEI has approved it.

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.

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.

Step 4: Prepare the student

The student needs to be able 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 and accommodation they will live and socialise in. Links to relevant sources of information are included in Appendix D and examples of student briefing documents and presentations are provided within the toolbox.

With appropriate support students can be requested to conduct the risk assessment for their placement, as this will encourage them to understand risks and consider how they can manage them, but the duty of care to ensure they are suitable and sufficient remains with the HEI.

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 maintain contact or report any concerns about their health and safety while on placement.
- Signposts to relevant sources of information about general health and safety issues in the workplace, living arrangements and destination.
- 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.
- For self-employed placements, sources of information about their legal obligations.

Where relevant, it may also be appropriate to highlight any requirements from other institutional procedures, for example there may be H&S or Ethics requirements if the student is planning to collect data or samples for research projects whilst on placement.

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, appropriate to the duration of the placement. 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 5: Record findings and approve the placement

When you are satisfied that the provider understands and accepts their roles and responsibilities, there are no unresolved concerns and the student has been briefed you are ready to approve the placement. The process should ensure it is clear to the student when their placement has been approved (or hasn't).

A record of the information gathered for steps 1-3 and delivery of student briefing should be maintained as evidence for each student or placement group. The toolbox contains examples of the formats for data gathering and recording used by different HEIs.

B. During the placement

Step 6: Deal with health and safety issues

When the student is out on placement, responsibility for looking after their health and safety rests with the placement provider and student. However, you have a responsibility to support the student should problems occur. Therefore it is good practice to maintain contact with the student at pre-agreed intervals appropriate to the placement duration and risk levels, except for extremely short duration placements. There should be pre-determined contact plans and defined trigger points/process for escalation if the pre-agreed regular contact is not made.

Students should raise any concerns in the first place with their workplace supervisor and then either through the placement provider's management line or with their nominated health and 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 staff to visit placement students, usually for academic assessment or employer engagement reasons 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. Staff 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 visiting member of staff 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 staff visiting placement students is given in the table:

Area	Question	Action
General	How do you feel about the health and safety of the placement and your own wellbeing?	Raise with placement provider contact/manager.
Accidents & 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 & induction	Did you receive any induction training which included health and safety issues? 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.

The pre-placement briefing for the student should include general information about health and safety requirements within the workplace and the placement provider is responsible for ensuring the student receives an appropriate health and safety induction.

It may be beneficial to provide students with a checklist of areas the placement provider should cover with them on induction for reference. There is an example checklist included within the toolbox.

C. After the placement

Step 7: Undertake review

There should be a process in place to ensure any concerns raised about health and safety at a provider have been addressed and are unlikely to recur before any future placements are approved.

You should ensure any concerns are resolved and investigated to determine if they could recur in future placements. This should be recorded so it can be reviewed when organising subsequent placements.

PART 3: APPENDICES

Appendix A: Risk profiling and risk reducing actions

This table provides indicators for categorising risk (step 1) and suggests additional actions

to be taken in steps 2 to 4 depending upon the risk profile of each factor. It can be adapted to suit your HEI's placement profile.

Risk profile	Indications	Possible specific action to reduce risk
Work		
Low	Office work or other low hazard environments and activities.	None.
Medium	Working in proximity to high risk factors (but not directly with them). Work involving more practical elements with moderate potential for harm, e.g. education and service sectors.	Ensure student is aware of the hazards of the placement as part of the briefing process.
High	Work with hazards that have potential to cause permanent injury or fatalities, including: <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. • Community work with known high risk groups of clients or locations (drug abusers, homeless, violent patients). Work with animal bedding or large or dangerous animals. • Activities requiring specific licenses or qualifications (e.g. diving, flying aircraft / UAV). • Work involving significant hazards in small companies that do not have professional health and safety advice. 	Ensure competency requirements for high risk activities have been agreed and ensure student meets them. Confirm that training & supervision will be provided by the placement provider. Consider pre-placement site visit. Ensure student is aware of the hazards of the placement as part of the briefing process.

Risk profile	Indications	Possible specific action to reduce risk
Travel and transport factors		
Low	<p>No significant travel, comfortable daily commute.</p> <p>No driving associated with placement.</p>	None.
Medium	<p>Night travel.</p> <p>Long daily commuting requirement.</p> <p>Student required to drive their vehicle in reasonable conditions.</p>	<p>Discuss travel arrangements with the student to ensure risks are considered.</p> <p>Advise them to check that they have the necessary licenses, insurances & experience.</p>
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>Role requires student to drive others in unfamiliar vehicles or locations.</p>	<p>Discuss travel arrangements with the student to ensure risks are considered.</p> <p>Get confirmation they have relevant driving licenses, insurances & experience.</p> <p>Consider actions to reduce risks where practicable e.g. providing accompanied travel, avoiding night driving, and use of public transport rather than drive.</p>

Risk profile	Indications	Possible specific action to reduce risk
Location & / or regional factors		
Low	Placements in student's home region with no significant elevated local risks (e.g. low/medium risk countries*).	None.
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 not in the student's home region with no significant elevated local risks (e.g. low/medium risk countries*).</p> <p>Placements in international locations with significantly different regulatory frameworks.</p>	<p>Include within briefing or direct students to sources of information about travel advice* on their location (personal safety, accommodation, food safety, cultural differences etc.)</p> <p>Agree how the student will maintain contact with the HEI.</p> <p>Ensure student understands the implications of differences in legal frameworks.</p>
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 or where means of communication likely to be difficult or compromised.</p>	<p>In addition to the above;</p> <p>Follow your HEI requirements / approval escalation processes for high risk travel.</p> <p>Check travel advice* restrictions and recommendations and agree precautions with the student. Encourage them to subscribe to travel advice updates for destination.</p> <p>Agree robust arrangements for maintaining contact with the HEI.</p> <p>Consider providing information from 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>

*Travel advice by country or region can be sought from the Foreign & Commonwealth Office website or from your HEIs competent third party advisory service if available or home country's equivalent service for international students where appropriate.

Risk profile	Indications	Possible specific action to reduce risk
Health and environment factors		
Low	No significant environmental or health risks.	None.
Medium	Regional/local conditions recommend precautionary measures, e.g. optional inoculations against diseases.	<p>Advise student to seek medical advice regarding immunisations, medications and management of health conditions.</p> <p>Highlight potential issues which could occur regarding medication (potential for loss, unavailability in country, illegality, and requirement for GP note).</p> <p>Include within briefing or direct students to sources of information about living arrangements (health, accommodation, food safety, cultural issues etc.)</p>
High	<p>Regional/local health risks require mandatory and specific health protection measures e.g. inoculations or quality of healthcare services uncertain.</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> <p>Standards of safety / hygiene very low.</p>	<p>In additional to the above:</p> <p>Consider ensuring the student consults a medical/travel health professional or occupational health for advice regarding immunisations and other preparations, for example to advise on pre-existing health conditions.</p> <p>A medical travel kit is a sensible precaution. Students should have training in how to use the medical kit, or be able to demonstrate competence.</p>

Risk profile	Indications	Possible specific action to reduce risk
Individual student factors (see App. B for detail)		
Low	The student has no mental or physical medical conditions or disability likely to cause episodes of illness or require specific support whilst on placement. Student has relevant knowledge, understanding and skills for the type of work.	None.
Medium	The student has personal factors (e.g. mental or physical health conditions, disability, pregnancy, linguistic or cultural) which may require specific adjustments or support during work, or in social interactions at work.	Engage with student, placement provider and health & / or disability support professionals to develop and agree reasonable adjustments. Confirm these in the written communication with the placement provider and student.
High	<p>The student has personal factors (e.g. protected characteristics) which may increase the risk of illness or incident even following adjustments.</p> <p>The student has personal factors (e.g. mental or physical health conditions, 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 elements of high risk with the student to try to eliminate or reduce them where possible. Take account of impact of other risk factors identified in the risk profiling table when determining suitability of placement.</p> <p>Engage with student, placement provider and health & / or disability support professionals to develop and agree reasonable adjustments. Confirm these in the written communication with the placement provider and student.</p> <p>Consider provision of additional pastoral support contact e.g. access to HEI's student support professionals.</p> <p>Discuss with provider and student how any competence / capability gaps can be addressed.</p> <p>Consider pre-placement site visit.</p>

Risk profile	Indications	Possible specific action to reduce risk
Insurance limitations (see App. C for detail)		
Low	<p>Locations, activities & /or circumstances that are automatically included in HEI's insurance cover.</p> <p>UK locations (where the placement provider must have employers' liability insurance cover).</p>	None.
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>Raise student awareness about potential restrictions within insurance policies.</p>
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>Refer to HEI's insurance specialist or HEI procedures /guidance before for advice before approval.</p>

Appendix B: Supporting students with protected characteristics or health conditions

Work placements provide an opportunity for vocational learning and personal development. They can be a particularly valuable way for students with protected characteristics or mental and physical health conditions to experience the world of work from which they might otherwise be excluded. It is important that all students have equal access to work placements.

The Protected Characteristics

The main piece of legislation in the UK is the Equality Act 2010 which defines “protected characteristics” upon which discrimination is unlawful. These are:

- Age.
- Disability.
- Gender Re-assignment.
- Pregnancy and maternity.
- Race.
- Religion and Belief.
- Sex or Gender.
- Sexual Orientation.

Full definitions of these characteristics are available on the Equality and Human Rights Commission website.

Disclosure

All students should be provided with opportunities to disclose disabilities, mental and physical medical conditions and other factors (e.g. pregnancy and maternity, childcare, periods of religious observance, transport limitations etc.) which may affect their work placement experience.

It is important that explicit consent is sought from students to share relevant personal information (such as disabilities) with the placement provider. This information should only be passed to people to whom it is relevant (e.g. to HR managers or

placement provider supervisors). Institutions should ensure their procedures meet the requirements of the General Data Protection Regulations 2016.

Where a disability may impact on the safety of the placement the university will be obliged to ensure that either the information is passed on to the provider or the placement is not approved e.g. where students will be working with children or other vulnerable people, or where chemicals or dangerous equipment will be used and there are health and safety considerations.

In the case of a disability or health condition, the disabled student concerned will often be the best placed person to advise potential employers as to what adjustments could be made available; there may also be other specialist advisory services within the HEI that can assist.

Reasonable adjustments

The majority of ‘reasonable adjustments’ involve adaptations which require no cost outlay for employers. Although many employers are willing and able to make adjustments, it should be noted the legal duty for ensuing reasonable adjustments are made rests with the HEI, because the disadvantage suffered would be academic. Therefore, if reasonable adjustments cannot be made by a provider, the HEI must seek to ensure the student does not suffer disadvantage, for example by funding adjustments or sourcing another suitable placement.

Examples of reasonable adjustments might include:

- Selecting placements to minimise travelling for disabled students.
- A preliminary visit before the placement starts for the employer and student to discuss support needs.
- An orientation visit before the placement starts so that disabled students can find their way about the location.
- Adjustments to practical arrangements,

such as travel and accommodation, rather than to the work itself.

- Extra rest breaks, and the chance to take care of medical needs.
- Assistive technology (including standard accessibility functions built into all Microsoft programmes).
- A support worker or job coach.
- Access to counselling services.
- A “work buddy” to provide ongoing support and training.
- Part-time rather than full-time placements.
- Support at interview.
- Adjustments at pre-placement training e.g. at first aid courses.

Work placements abroad

The student who is intending to travel should research how their destination considers their protected characteristic(s) may mean they encounter additional risks (e.g. in some countries homosexuality is illegal). They must consider the possible risks that may be associated with their travel in relation specifically to one or more protected characteristics. Typically the Foreign and Commonwealth Office website details this information about the country in their travel advice section on their website.

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.

Exact insurance requirements and policy caveats that will vary between institutions so each HEI should work with their insurers to

ensure it has appropriate cover for its activities and provide clear guidance internally on policies held by the HEI including any important caveats and also those policies required by the provider / student.

The table below summarises the main types of relevant insurance policies particularly relevant to placements.

Type of Cover	Explanation of Cover
Employers' Liability (EL)	Held by UK placement provider and meets the cost of compensation for employees' injuries or illness whether they are caused on or off site following negligence by the employer.
Public Liability (PL)	Held by placement provider this insurance covers the cost of claims made by members of the public for incidents that occur in connection with business activities. Public liability insurance covers the cost of compensation for personal injuries, loss of or damage to property.
Personal Accident (PA)	This personal insurance is an annual policy which provides compensation in the event of injuries, disability or death caused solely by violent, accidental, external and visible events.
Workers' Compensation (WC)	Workers' compensation may be held by the placement provider, it is a form of insurance providing wage replacement and medical benefits to employees injured in the course of employment in exchange for mandatory relinquishment of the employee's right to sue his or her employer for the tort of negligence.
Professional Indemnity (PI)	Professional indemnity insurance is a type of liability cover designed to protect an individual or business against claims made by clients for loss or damage due to negligent advice or services provided for a fee. This is usually held by the placement provider although a student may purchase this policy directly it is usually very costly to do so.
Travel	Travel insurance is insurance that is intended to cover medical expenses, trip cancellation, personal possessions, personal liability and other losses incurred while traveling, either internationally or within one's own country. Cover varies policy to policy and therefore there may be some differences in cover.

Type of Cover	Explanation of Cover
Motor	A motor insurance policy is a policy issued by an insurance company as part of prevention of public liability to protect the general public from any accident that might take place on the road. Cover can vary, but generally covers death, injury, damage to vehicles and third party property.
Medical / Health	Health insurance is a type of insurance coverage that pays for medical and surgical expenses incurred by the insured. Health insurance can reimburse the insured for expenses incurred from illness or injury, or pay the care provider directly.

The exact requirements depend on the circumstances of the placement. In all cases the following scenarios require cover to provide compensation for harm:

Scenario 1: resulting from negligence by the HEI.

Scenario 2: to the student resulting from negligence by the provider.

Scenario 3: resulting from a student's actions.

The HEI's PL insurance provides cover to meet a legal claim with respect to something that was the fault of the institution (scenario 1).

It is usual for the provider to hold insurance policies that provide cover for harm to the student resulting from their work at the provider (scenario 2). 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. Within the UK most employers are legally required to hold EL Insurance², and there is an agreement among the UK insurance industry that work experience persons will be regarded as employees by all UK insurers and covered by EL policies.

Some UK employers are exempt from the compulsory insurance requirement including some Government bodies, companies with no employees and family operations. Outside the

UK some countries require WC policies to be held which would provide similar cover to EL or there may not be a legal requirement to hold any such policy.

Therefore the initial screening process should ask placement providers if their insurance covers liability for injuries or sickness suffered by placement students attributable to their duties with the organisation. Where this is not the case the placement may be declined or referred to the HEI's approval escalation mechanism. HEIs should ensure they understand any potential liability they may hold if such placements are approved. If such placements are approved, the student should be briefed on the potential implications and written confirmation be sought from the student accepting that they understand the potential implications and risks associated. The student may wish to purchase personal accident cover in this case, however it should be noted it is not meant to replace EL/WC and is normally a low limit in terms of compensation.

If the student is undertaking a 'Self Employed' placement then they will not require EL cover, however, they may require Public Liability cover and possibly Professional Indemnity cover which they will have to arrange themselves.

Within the UK, employers are vicariously liable for the negligent acts of their employees including students on placement, if such

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

²Employers' Liability (Compulsory Insurance) Act 1969.

acts cause injury to others (scenario 3). This liability will be covered by the placement provider's insurance policies as the provider is responsible for supervising the placement student during their duties. As with the previous scenario the situation can be more variable outside the UK therefore the initial screening process should ask placements providers if their insurance also covers liability for harm resulting from student's actions conducted in connection with their duties for the organisation.

This is particularly relevant where placements are within a field where there may be legal liability for professional risks (e.g. medical, dental, veterinary placements). This 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. Students working within NHS hospitals in the UK are usually covered for professional risks under the Clinical Negligence Scheme for Trusts. GP practice's medical malpractice insurance should usually cover those placed with a GP practice in the UK. If the placement is in a private hospital, hospice or nursing home this may not always be the case.

For placements in relevant professional settings, the initial screening should also ensure providers confirm their insurance will cover professional liability of the student for injuries to third parties arising from their duties. Where this is not the case, the placement should not be approved unless cover can be provided from another source (e.g. the student or HEI buy cover).

Additional insurances

Depending on the circumstances of the placement additional insurance cover may be required related to travel. If a placement requires the student to drive, suitable motor vehicle insurance will be required. This may be provided by the placement provider if the student is driving the provider's vehicle. If the student is driving their own vehicle for work purposes it is important to check the insurance covers 'business purposes' and not just 'social domestic and pleasure' use of the vehicle.

Where students are travelling abroad for their placement it is important an appropriate travel insurance policy is in place. This provides assistance in most emergency situations without which students could be vulnerable.

Where institutions provide travel insurance for students any caveats (e.g. reduced coverage in high risk locations, exclusions for sports activities, lifestyle, holiday periods or pre-existing conditions) should be communicated to the student. Where institutions do not provide cover they should have a process for ensuring /encouraging students to purchase their own policy for the duration of their trip. The medical cover included in travel insurance policies can be expected to exclude routine treatments but may limit cover for pre-existing conditions, pregnancy and childbirth. If this is a concern, the student may wish to purchase medical/health insurance locally.

The European health card scheme³ provides healthcare for European citizens to the same level as the national health scheme in that country, which may be limited and/or not free at the point of delivery. Some countries, such as Australia have reciprocal health arrangements for long term care such as dialysis, students should be encouraged to research the details of these schemes before travelling.

Where students are purchasing their own cover for any policy type, they should be advised to check the wording, and particularly the

³ Advice on this subject should be reviewed once the outcome of the British exit from the EU is known.

exclusions, carefully to ensure that it meets their requirements. Most HEIs cannot advise students on purchase of specific policies as they are not authorised to offer financial advice under the Financial Services Authority rules.

Appendix D: Further information and acknowledgements

Further information

ASET (Work-Based and Placement Learning Association):	http://www.asetonline.org
ABI (Association of British Insurers):	https://www.abi.org.uk/products-and-issues/products/business-insurance/liability-insurance/employers-liability-insurance/work-experience-students/
Information Commissioner's Office:	https://ico.org.uk/for-organisations/guide-to-the-general-data-protection-regulation-gdpr/
British Council:	https://www.britishcouncil.org/study-work-create/practicalities
DFES Guide on Work Placements for Disabled Students:	http://dera.ioe.ac.uk/10158/
Equality and Human Rights Commission:	https://www.equalityhumanrights.com
Foreign & Commonwealth Office:	https://www.gov.uk/browse/abroad/travel-abroad
	https://issuu.com/foreignandcommonwealthoffice/docs/planpackexplore
	https://www.gov.uk/guidance/lesbian-gay-bisexual-and-transgender-foreign-travel-advice
	https://www.gov.uk/guidance/foreign-travel-for-disabled-people
Health & Safety Executive:	http://www.hse.gov.uk/youngpeople/workexperience/
ILGA (Intl Lesbian, Gay, Bisexual, Trans & Intersexual Association):	http://ilga.org/
National Health Service:	http://www.fitfortravel.nhs.uk/home.aspx
Student guide on placements abroad:	http://www.thirdyearabroad.com/
Studentpad guide on accommodation:	www.studentpad.co.uk/HousingGuide
Universities Safety and Health Association:	www.usha.org.uk

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