

**Managing Risk**  
**Guidelines for the Management of Student**  
**Placements at GCU**

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## A. Introduction

The format and function of student placements vary greatly depending on the subject discipline and the programme context. These guidance notes aim to provide a generic framework for managing the diversity of placements and the potential risks associated with them. They are based on the recommendations provided by the Universities and Colleges Employers Association (UCEA, 2009), the ASET Good Practice Guide for Placement Learning (2007) and the QAA Code of Practice for Work-Based and Placement Learning (2007). They should be read in conjunction with GCU's policy on placement learning provided by the university's Quality Office <sup>1</sup>.

This document outlines the minimum requirements that the university expects academics and students in all schools and placement providers to meet. Rather than stipulating subject specific practices it aims to provide set of broad principles<sup>2</sup> that should underpin current practice all across the university.

These guidelines cover **placements that are a planned, accredited part of a student's programme of study**. They are relevant for placements in the UK or abroad, placements that are subject to professional standards or not. The university does not take responsibility for any work-based learning which students arrange independently such as such as part-time work or work experience and internships during university holidays.

The **definition of the terminology** relating to placement roles and responsibilities varies in the relevant literature. For the purpose of this document key terms are defined as follows: <sup>3</sup>

### Placement

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

- which is undertaken as an integral part of the student's programme
- where the student is enrolled at GCU during this period
- which involves at least a partial transfer of direct supervision of the student from GCU staff to a third party, the placement provider.

### Placement provider

During the placement the placement provider is responsible for the direct supervision of the student. For general principles relating to insurance cover, please consult section 2 of this document.

### Workplace supervisors

Workplace supervisors are engaged by the placement provider to supervise and support the student during the placement.

### Placement organisers

Placement organisers can be any members of GCU staff who are responsible for authorising the placements of students with placement providers.

### Visiting tutor

A visiting tutor is an individual who is employed by, or contracted to, the university. They visit students on placement.

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<sup>1</sup> GCU Quality Office, Guidelines on Placement Learning, Quality Assurance and Enhancement Handbook, Section 9, Appendix 9(h). <http://www.gcu.ac.uk/quality/collaborative/index.html>

<sup>2</sup> See also the principles suggested by the QAA, 2009, p.22 ff

<sup>3</sup> UCEA (2009), p.3

## **B. Guidelines for academic staff: Managing risk**

### **1. The strategic framework: a risk management approach**

Given that placements involve internal and external stakeholders with different motivations and priorities, the university requires schools to adopt a risk management approach to managing them. This approach consists of a series of generic control measures. They are designed to prevent potential misunderstandings about the roles and responsibilities of all parties involved and to establish explicit, uniform processes that ensure high a quality learning experience for the student. While all placement programmes need to be assessed and audited for risks it must be recognised that some placements are lower risk than others. Resources need to be concentrated on those which present higher risks for the students involved.

The risk management approach consists of six stages:<sup>4</sup>

1. Review and approval of placements
2. Processes for raising and resolving problems
3. Planning for contingencies
4. Ensuring each party understands their roles, rights and responsibilities
5. Preparing students
6. Preparing staff

The best way of conducting this process should be discussed and determined by the school, the department and the relevant programme teams who are familiar with the special requirements of their subject disciplines. The generic 6 steps approach, though, should be followed all across the university. Details and guidance on the different stages of the process are provided in the following sections.

### **2. Undertaking a risk management approach at programme level**

#### **2.1 Review and approval of placements**

The university has a duty of care and a legal obligation to the students to ensure that the placement is appropriate for their level of study and the learning outcomes they are required to achieve. A **pre-placement risk assessment** should be undertaken and documented to make sure the placement provider has the right resources, policies and staffing in place to support student learning. See appendix A for a generic proforma that could be developed and tailored to the subject specific issues that might arise from different kinds of placements. If groups of placements with similar risk profiles can be identified, the risk assessment process would not need to be undertaken for each one. At this stage of the process it is important to involve academic staff who are responsible for the academic

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<sup>4</sup> Adapted from UCEA, 2009, p. 8 ff

contents of the programme. It will also be necessary to refer to the requirements of the relevant professional bodies and the practice obligations they specify.

The following **checklists** are designed to assist staff in auditing and, if necessary, improve their own procedures. The lists are not complete and not all issues are relevant for all placements. Programme teams are in the best position to develop their own, subject specific ones.

Schools are expected to:

- identify who is in charge of finding placements
- stipulate clear criteria for choosing some providers and rejecting others
- assess a provider's motives for offering a placement
- vet potential placement providers by carrying out routine checks such as
  - financial/ credit check
  - check information held at Companies House<sup>5</sup>
  - check health and safety procedures
  - check insurance cover (see also section E of this document)
  - check HR policies
  - check disclosure requirements
- carry out a formal risk assessment
- visit placement providers *before* the placement starts
- identify a process for reaching a decision on the suitability of placements (e.g. who decides? individuals? committees? programme teams?)
- keep a record of all placement providers and update that information regularly
- identify who has access to it
- ask employers to provide a job/ person specification for the placement (It is helpful for employers if schools design a standard form or template for it.)
- document their procedure for matching students to placements
- explain how students are supported in their own search for appropriate placement opportunities
- identify how the school ensures that the same GCU quality procedures apply for placements abroad
- undertake a regular annual review of their placement providers and document it.

## 2.2 Processes for raising and resolving problems

Programme teams need to have clearly documented processes which explain how students placement providers and tutors can raise potential concerns about the placements. All parties must be informed as to *what* they should monitor and report, to *whom* and *how*.

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<sup>5</sup> <http://www.companieshouse.gov.uk/index.shtml>

Schools are expected to:

- make students and placement providers aware of the GCU attendance monitoring policy<sup>6</sup>
- have a documented grievance and disciplinary procedure, both for the student as a student and recognising that an employer will normally have similar procedures for the student as an employee<sup>7</sup>
- have a formal process which allows the students and placement providers to report any potential difficulties or problems they might experience during the placement
- make them aware of this process
- have a system for logging problems raised by the student, tutors or the placement provider
- keep a record of the resolutions
- collect feedback from students, tutors and placement providers in one central place
- identify who has access to that information
- make students aware of the guidance and support they can expect to receive from the university and the placement provider
- provide students with instructions on how to deal with an 'emergency'.

### **2.3 Planning for contingencies**

Programme teams need to agree on a contingency plan for exceptional circumstances. This is of particular importance if the placement is in a location which makes visits from placement tutors difficult or impossible; e.g. on placements abroad.

Schools are expected to:

- keep a record of how students can be contacted on placement and at home and next of kin contact details
- provide students with contact details of staff they can contact in an emergency
- make sure their contingency arrangements are covered by a suitable insurance policy (See section E of this document.)

### **2.4 Ensuring each party understands their roles, rights and responsibilities**

It is important that each of the parties involved in placements (see above) has a clear understanding of their roles, rights and responsibilities. To avoid potential misunderstandings they need to be recorded in written documentation which is made

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<sup>6</sup> See GCU Policy on Attendance Monitoring and Reporting (Student) <http://www.gcu.ac.uk/guidelinesandpolicies/>

<sup>7</sup> See ASET (2009)

available to all parties<sup>8</sup>. Sections D and E of this document provide a template for guidance for students and placement providers.

Schools are expected to:

- make sure that students, university staff and placement providers are aware of their rights and responsibilities
- ask all parties involved to sign a joint agreement or 'contract'
- test whether students have understood their instructions; this is especially important in the case of international students whose first language is not English
- provide special documentation/ guidance notes for international, non EU/EEA students to make sure they comply with UKBA regulations (See section F of this document.)
- ensure that providers are fully compliant with EU and UK law and fully aware of the requirement to comply with UKBA reporting regulations
- seek and follow advice from UKBA, GCU's UKBA Compliance Officer and GCU's International Students Support Service *at all times*.

## 2.5 Preparing students

Students must be provided with information about their placement as early as possible. The schools' documentation needs to include clear guidance on all the issues stipulated by GCU's Policy on placements<sup>9</sup> which includes intended learning outcomes for the programme and the module, methods of assessment, academic requirements and the university complaints procedure. In addition schools are expected to:

- provide appropriate briefing sessions about the aims and objectives of the placement
- make students aware of their role as a representatives of the university who need to act in a professional manner at all times<sup>10</sup>
- explain to students that they are entitled to be visited by a member of staff while on placement and that these visits are an opportunity to discuss and, if necessary, improve the learning process offered by work-based learning; these visits can also be used to raise matters of concern with the placement provider
- provide separate information for international students from outside the EU/EEA (see above)
- hold information events for future placement students based on the feedback received from returning students and their hosts.

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<sup>8</sup> See ASET (2009)

<sup>9</sup> GCU Quality Office, Guidelines on Placement Learning, Quality Assurance and Enhancement Handbook, Section 9, Appendix 9(h). <http://www.gcu.ac.uk/quality/collaborative/index.html>

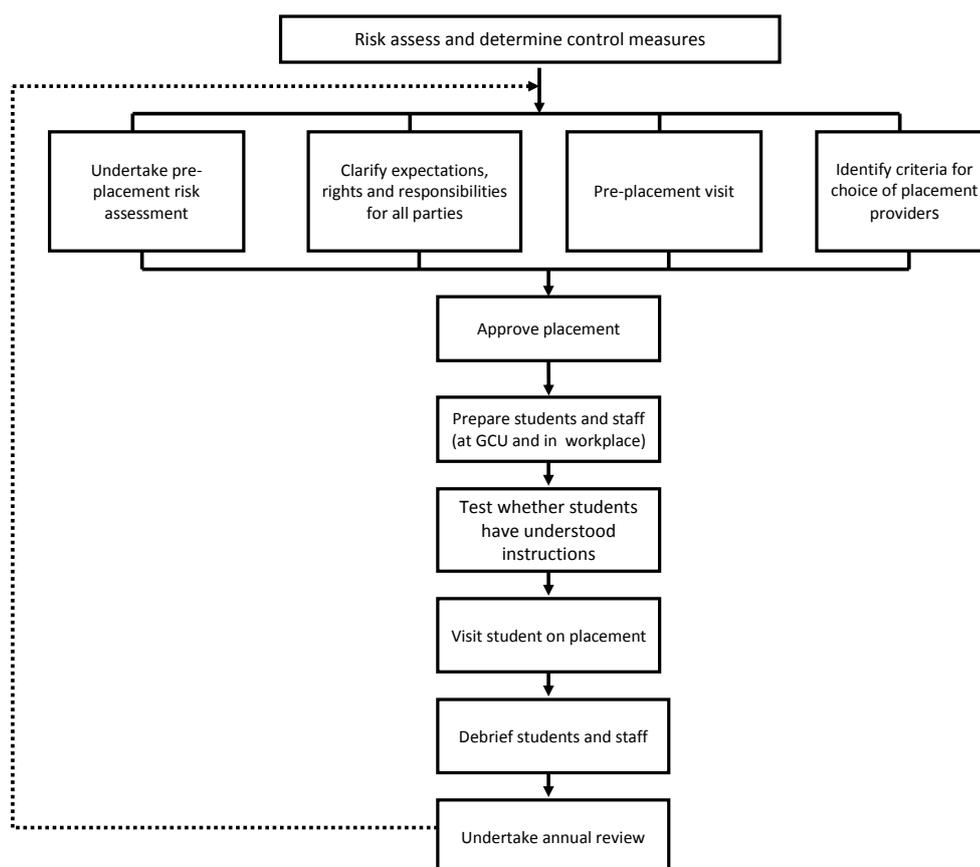
<sup>10</sup> See ASET (2009) and good practice example in appendix B

## 2.6 Preparing staff

All staff who are involved with student placements must receive the necessary guidance and training on GCU's policies on placements, attendance, insurance, health and safety and, if international students are involved, the briefing document on the UKBA Points Based System (see section F of this document)

### Chronology of the placement process

(Adapted from UCEA, 2009, p. 13)



## References

ASET (2009), *A Good Practice Guide for Placement and Other Work-Based Learning Opportunities in Higher Education*

National Council for Work Experience, <http://www.work-experience.org/>

QAA, (2007), 2<sup>nd</sup> ed. *Code of Practice for the Assurance of Academic Quality and Standards in Higher Education, Section 9: Work-Based and Placement Learning*

Universities & Colleges Employers Association (UCEA), (2009), *UCEA Health and Safety Guidance for the Placement of Higher Education Students*

**Appendix**

**Template for risk assessment form**

(Adapted from UCEA, 2009, p. 21)

<b>Placement provider</b>	<b>Student</b>		<b>Start and end dates</b>
Name: Location:	Name: Contact details: International non EEA student: yes/ no		
<b>General control measures</b>	<b>Yes/ No</b>	<b>Action necessary?</b>	<b>Action completed?</b>
Has the placement provider confirmed receipt and acceptance of your written communication?			
Is this a new provider?			
Has the provider been vetted?			
If the provider has offered a placement before, has an up-to-date review taken place?			
Has the provider received sufficient briefing?			
Has the student received sufficient briefing?			
Has the visiting tutor received sufficient briefing?			
Has the provider been visited?			
Has a health and safety check taken place?			

**Prepared by .....** **Job title .....**

**Date .....**

**Have the actions been completed? Yes/ No.**

**I / we (print name/s ) approve this placement.**

**Signed.....**

**Date .....**

## C. Guidelines for placement providers

### Introduction

The format and function of student placements vary greatly depending on the subject discipline and the programme context. These guidance notes are designed to provide placement providers with advice on good practice *before*, *during* and *after* the placement. They are based on the recommendations provided by the *Universities and Colleges Employers Association* (UCEA, 2009)<sup>11</sup>, the *ASET Good Practice Guide for Placement Learning* (2009)<sup>12</sup> and the *Chartered Institute of Personnel and Development's Work Experience/ Internship Quality Charter* (CIPD, 2012)<sup>13</sup>. **This document outlines the minimum requirements that the university expects all placement providers to meet.** It aims to provide set of broad principles rather than prescriptive rules.

These guidelines cover **placements that are a planned, accredited part of a student's programme of study.** They are relevant for placements in the UK or abroad, placements that are subject to professional standards or not.

In order to ensure a positive outcome for the student and the placement provider, a series of steps needs to be followed. For more detailed advice, please consult the documentation provided by ASET and the CIPD (see footnotes below).

### 1. Good practice *before* the placement

Employers should

- be open about their motives for hosting placement students and be aware of what they can deliver
- familiarize themselves with the requirements and expectations of the student and the university
- provide information about the role the student will play in their organisation and how they will be supported, supervised and mentored
- comply with all relevant legislation including the working time directive, health and safety regulations, non-discrimination law and the UK Borders Agency's policy guidance on non-EU/EEA students<sup>14</sup>
- co-operate with the university in all procedural matters as they arise.

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<sup>11</sup> <http://www.ucea.ac.uk/en/publications/index.cfm/HSplace>

<sup>12</sup> [http://www.asetonline.org/documents/ASETCodeofPractice-Version2.1\\_000.pdf](http://www.asetonline.org/documents/ASETCodeofPractice-Version2.1_000.pdf)

<sup>13</sup> <http://www.cipd.co.uk/hr-resources/guides/internships-employers-guide.aspx>

and <http://www.cipd.co.uk/hr-resources/guides/work-experience-placements-work.aspx>

<sup>14</sup> <http://www.ukba.homeoffice.gov.uk/sitecontent/documents/employersandsponsors/pbsguidance/>

## 2. Good practice *during* the placement

Employers should

- be aware that they have full legal liability for students as employees
- treat the student as an active member of staff but do not use the placement to fill a vacancy
- provide induction and training including health and safety provision, the organisations' policies and regulations and other relevant matters
- introduce the student to the structure of their organisation and to key people they will work with
- outline a plan or schedule for the tasks the student is going to undertake during their placement; the CIPD emphasises the importance of allocating meaningful, challenging tasks rather than menial jobs<sup>15</sup>
- appoint a line manager/ supervisor for the student and ensure that they have access to the placement staff at the university
- identify a mentor, distinct from the line manager, to oversee the development and learning processes of the student
- co-operate with the university to meet the requirements of the student's academic programme such as the need for assessment and feedback
- make appropriate provision for the student to be visited by university staff
- provide an appropriate assessment and/ or report on the student's conduct and performance
- carry out a final review meeting with the student <sup>16</sup>
- contact the relevant GCU staff immediately if there are any concerns regarding the placement or the student and seek ways to resolve the situation in collaboration with them.

## 3. Good practice *after* the placement

At this stage of the placement process the student and the university will carry most of the responsibility for the student's learning. However, employers can make a useful contribution.

They can

- provide the student with a reference at the request of a future employer
- offer placement opportunities to future student cohorts and attend information sessions at the university

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<sup>15</sup> See CIPD Guide on work experience placements , p. 16, " Think tasks not tea"

<sup>16</sup> See CIPD Internships Guide, p. 9 for suggestions regarding format and structure of such meetings

- implement potential suggestions identified in discussions with the student and university staff.

Please note that the CIPD Internship Charter provides useful **checklists** for running internships that apply equally to placements<sup>17</sup>.

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<sup>17</sup> See CIPD Internships Guide, pp. 11 and 12

## D. Guidelines for placement students

### Introduction

A student who enrolls on an academic programme which includes a placement must be aware that it requires a considerable amount of preparation and commitment. **This document outlines the minimum requirements that the university expects all placement students to meet.** Rather than stipulating detailed duties that are specific to the students' academic subject and programme it aims to provide a set of broad principles that support them in gaining the most benefit from the placement experience.

These guidelines cover **placements that are a planned, accredited part of a student's programme of study.** They are relevant for placements in the UK or abroad, placements that are subject to professional standards or not. **The university does not take responsibility for any work-based learning which students arrange independently such as such as part-time work or work experience and internships during university holidays.**

In order to ensure a positive outcome of the learning experience, it is imperative for the student to recognize that it is ultimately his/ her responsibility to deliver a satisfactory placement. The university will brief, support and prepare them but it is undoubtedly the collaboration between the placement provider and the individual student that determines the quality of the placement experience. **These guidelines outline the university's expectations of placement students before, during and after the placement.** They are based on advice provided by ASET<sup>18</sup>, the professional body for placement staff, and the Quality Assurance Agency's (QAA) Code of Practice for Work-Based and Placement Learning (2007)<sup>19</sup>. For programme specific guidance, students must consult the programme handbooks and the academic staff in the relevant department.

### 1. Student responsibilities *before* the placement

#### Students are required to

- make full use of all the support offered by the university regarding seeking and preparing for the placement; this will include academic and practical activities such as attending sessions for pre-requisite modules, induction and information events, meetings with previous placement students and potential placement providers
- recognise that they act as a representative of the university when dealing with a placement provider and act appropriately
- inform the university placement staff immediately if they have found a potential placement opportunity themselves and recognise that it must be formally approved by the university

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<sup>18</sup> [http://www.asetonline.org/documents/ASETCODEofPractice-Version2.1\\_000.pdf](http://www.asetonline.org/documents/ASETCODEofPractice-Version2.1_000.pdf)

<sup>19</sup> <http://www.qaa.ac.uk/Publications/InformationAndGuidance/Pages/Code-of-practice-Section-9.aspx>

- acknowledge interview appointments that have been arranged by the university or the placement provider and advise them in advance if they cannot be kept
- withdraw all other ongoing applications as soon as a placement offer has been accepted; after acceptance it should be considered binding
- inform the university and the provider within 48 hours of an interview if they no longer wish to take up a placement opportunity.

## 2. Student responsibilities *during* the placement

### Students are required to

- inform the university of their most recent contact details including placement and residential addresses, telephone and fax numbers, e-mail addresses, name and contact details of workplace supervisors
- attend the workplace as required by the placement provider and comply with GCU's most recent attendance policy<sup>20</sup>
- conduct themselves responsibly at all times respecting issues of ethics, confidentiality, health and safety, dress code and other relevant regulations
- comply with all relevant legislation including working time directive, health and safety regulations, non-discrimination law and the UK Borders Agency's policy guidance on non-EU/EEA students<sup>21</sup>
- make the most of every learning opportunity during the placement to achieve the learning outcomes for the module/ academic programme; this relates to academic contents, generic skills and professional behaviour
- provide evidence of their learning as and where required by assessment, for example in a portfolio or reflective diary; check with academic staff and programme documentation for details
- recognise that they are typically entitled to a visit by university staff during their placement which is to be viewed as an opportunity to discuss and enhance the learning process rather than as a response to a 'problem' situation
- contact the relevant GCU staff immediately if there are any concerns with the placement or differences with the placement provider and seek ways to resolve the situation in collaboration with them.
- be aware that they are students as well as employees and act to enhance the reputation of the university and the programme in order to maintain a good relationship with the placement provider in the future
- co-operate with the university in all procedural matters as they arise.

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<sup>20</sup> <http://www.gcu.ac.uk/student/about/regulations/>

<sup>21</sup> <http://www.ukba.homeoffice.gov.uk/sitecontent/documents/employersandsponsors/pbsguidance/>

### **3. Student responsibilities *after* the placement**

#### **Students are required to**

- be pro-active in integrating their learning from the placement with their academic studies
- share their experience with academic staff, fellow students, future placement students and providers
- use their experience as a basis for reviewing and refining their career plans.

## **E. Summary of insurance requirements for student placements**

The University has a duty of care to the student to ensure that the placement is appropriate for the level of study and that the student will not be at risk in terms of personal safety during the placement. The University's insurance policies require the University to minimise the risk of potential claims as far as is reasonably practical. A written risk assessment should be undertaken for all placements.

The host organisation providing the placement will also owe the student a duty of care.

### **1. Potential Risks**

- Injury to the student
- Damage to the student's property
- Injury caused by the student to third parties
- Damage to third party property caused by the student

### **2. What the University insurance covers**

The University's public liability insurance covers its legal liability for loss, damage or injury that occurs to a third party.

This public liability insurance protects the student while he/she is on placement, for damage, loss or injury caused to the placement company, if the University is found to be legally responsible for that damage, loss or injury. It also covers the student for loss, injury or damage they may suffer themselves, again if the University's is found to be negligent and legally liable.

### **3. What the University does not cover**

The University's insurance cannot cover anything that is the legal liability or responsibility of someone else. If the University is asked to sign a contract with a placement provider which asks for the University to indemnify the placement provider against all loss or damage arising from the placement, this should not be signed as the University's insurance cannot meet this requirement.

### **4. What insurance the University should require from the placement provider**

Within the UK the placement provider is responsible for the health and safety of the student whilst on placement as if the student were their employee.

In the UK it is a legal requirement for employers to hold employers liability insurance. In the event of an accident at work arising from the placement provider's negligence, the student is covered in the same way as their employees. Sole traders are not legally required to have employers' liability insurance but as soon as they take on a placement student they effectively become an employer, so a sole trader must be advised to take out employers' liability cover if they are taking a student on placement.

Although it is not a legal requirement, all reputable employers in the UK should also have a current public liability policy, which will also protect the student against claims brought against the placement provider by other third parties.

The University should check that all potential placement companies have adequate employers' and public liability policies in place. Before a placement is approved, the placement company should be asked to declare:

Employers Liability: Limit of indemnity · Name of insurer · Date of expiry

Public Liability: Limit of indemnity · Name of insurer · Date of expiry

Please note that there are circumstances where the placement provider may not be obliged to insure, e.g. the NHS (self insure) or the MoD (no insurance).

## **6 Placements abroad**

The above information about employers and public liability should also be asked of placement providers who are based outside the UK. Placements abroad have added complications by the fact that every country may not have the equivalent to the UK's employers or public liability.

If the placement company cannot provide confirmation that there is an equivalent policy or scheme in place to protect the student, then this gap in cover placement tutors should explain this to the student.

## **7. Professional indemnity**

A student undertaking professional training in a professional setting will be covered by the professional negligence insurance of the placement provider. The expectation is that responsibility for the student lies with the supervisor. The supervisor is therefore responsible for ensuring that the student is not required to carry out any task which is beyond the competence of the student or is not appropriate for a student at that level of study.

Certain students on health-related placements will be protected by membership of the relevant professional body.

For further advice, please contact :

**Janice Bruce, Head of Non-Academic Governance**

Directorate of Governance and Academic Quality

[j.bruce@gcu.ac.uk](mailto:j.bruce@gcu.ac.uk)

## **F. UKBA Requirements for Tier 4 Students on Work Placement**

The University has a duty to comply with the requirements relating to Work Placements as laid out in the UKBA Tier 4 guidance. Any student undertaking a work placement must be enrolled at GCU during the work placement period

Below is a summary of these requirements.

### **Time Spent on Work Placement**

The programme of study for Tier 4 students may include a work placement if it is an integral and assessed part of the programme. For programmes of study at SCQF 9 and above the work placement element must not exceed 50% of the total length of the programme; this is commonly referred to as the 50% rule. For programmes at SCQF 8 (sub degree) and below the figure falls to 33%.

### **Types of Work Placement**

A work placement can be:

- Full or part time
  - Full time is defined as whatever the placement provider deems to be full time; so long as they remain UKBA compliant and are not breaking UK/EU law.
- Paid or unpaid.
- In country or out of country.

### **Examples of Work Placements:**

- The work placement element in a Post Graduate programme 12 months long cannot exceed 6 months.
- The work placement element in an Under Graduate programme 36 months long cannot exceed 18 months.
- The work placement can be undertaken as a whole or split into several section/periods. The important part is that the entire work placement element does not exceed 50% of the total length of the programme.

### **Exceptions:**

- The only exception to the 50% rule is where there is a statutory requirement for a programme to contain a work placement element which exceeds the 50% limit.

### **Tier 4 Student Working Hours during Work Placement**

All tier 4 students must abide by the terms and conditions stated on their visa including working hours. If a visa states that no working is allowed, then this condition supersedes any advice laid out in the tier 4 guidance.

It should also be noted that during the placement period, placed students can work full time if their provider deems it necessary and in addition work part time; part time is defined as a maximum of 20 hours in any single week.

### **Responsibility**

GCU will be responsible for the student throughout the period of their work placement and must continue to comply with its sponsor duties during this time.

### **Resources**

For further details on Work Placements please consult the staff briefing document at:

[http://www.gcu.ac.uk/media/gcalwebv2/theuniversity/supportservices/guidelinesandpolicies/UKBA Points Based System Tier 4 Briefing Document.pdf](http://www.gcu.ac.uk/media/gcalwebv2/theuniversity/supportservices/guidelinesandpolicies/UKBA%20Points%20Based%20System%20Tier%204%20Briefing%20Document.pdf)

Full details on Work Placements can be found under the section “Work Placements” in the policy guidance document titled “Policy Guidance for Tier 4 Sponsors” at:

<http://www.ukba.homeoffice.gov.uk/sitecontent/documents/employersandsponsors/pbsguidance/>

For further advice, please contact :

**Brian Fitzsimmons,**  
**UKBA Compliance Officer**  
[b.fitzsimmons@gcu.ac.uk](mailto:b.fitzsimmons@gcu.ac.uk)