



University of  
**Nottingham**  
UK | CHINA | MALAYSIA

Health and Safety

# Policy

Student Placements

SAF-POL-PLA

# Document Control

Document Details	
Reference	SAF-POL-PLA
Title	Policy – Student Placements
Version Number	V1.1
Approval Date	Sept 2024
Issue Date	Sept 2024
Review Date	3 years from approval or as and when needed
Status	APPROVED
Owner	Health and Safety Department
Author	Sarah Watson & Alice Smith

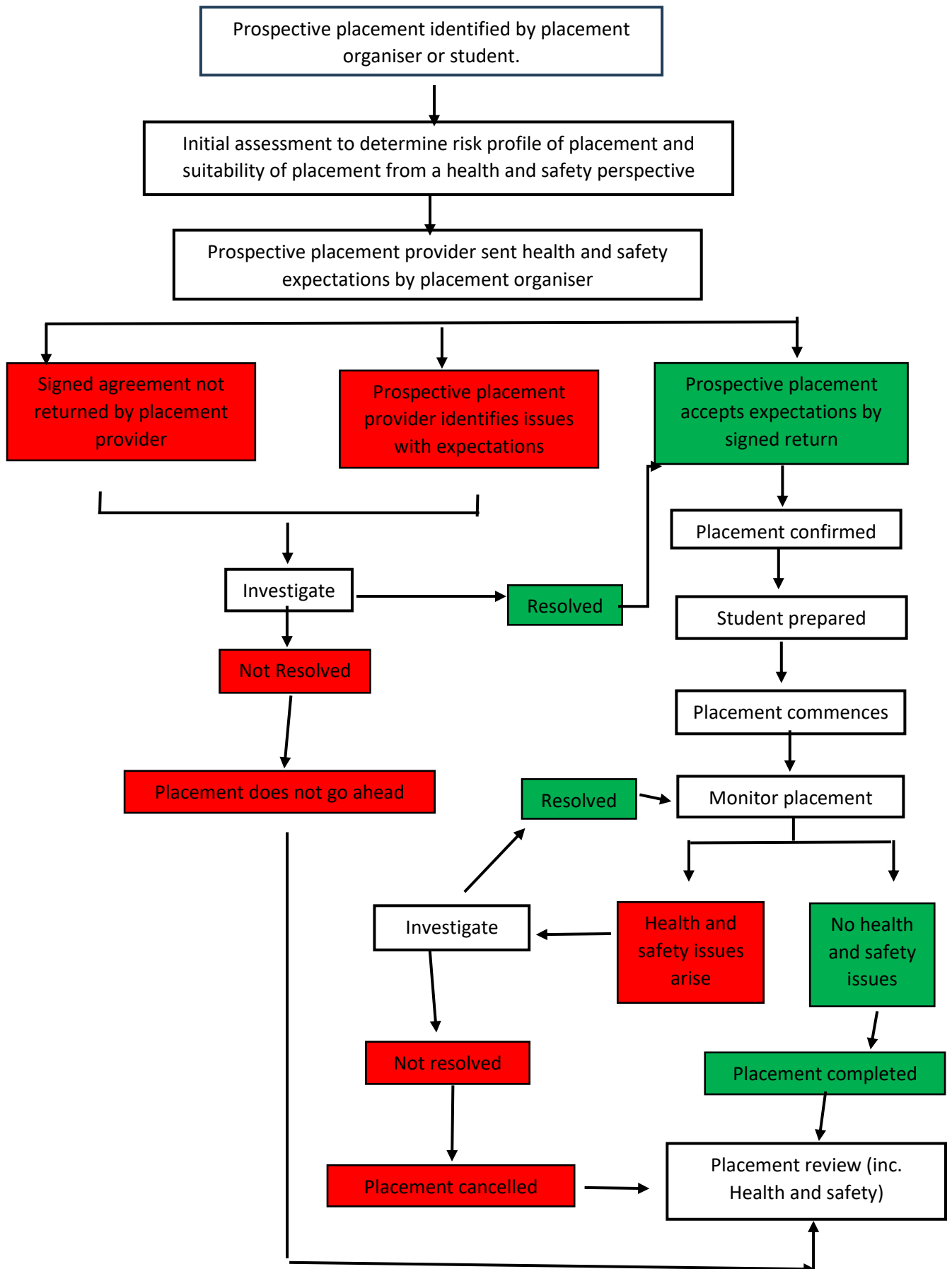
Document Revision History				
Revision	Date	Nature of Revision	Prepared by	Approved by

The Health and Safety Department will maintain the official version of this document. Before referring to any printed copies, please ensure that they are up-to-date.

# Contents

	<b>Page Number</b>
1 Introduction	5
2 Scope	5
3 Policy Statement	6
4 Regulatory Background	6
5 Definitions	6
6 Roles and Responsibilities	7
7 Selection of Placement Providers	10
8 Risk Assessment	10
9 Insurance	12
10 Training Competency & Supervision	13
11 Monitoring	13
12 Keeping in contact arrangements	14
13 Emergency Procedures and Contingency Plans	14
14 Incident Reporting and investigation	14
15 Health and Fitness for Placement	14
16 Equality, Diversity and Inclusion	15

## Student placement – Health & Safety Process flowchart



## 1. Introduction

**University policies establish standards and expectations for health and safety across the organisation and set the minimum standards expected.**

This policy implements guidance issued by the Universities Safety and Health Association (USHA). It states the requirements that need to be in place within Business Units to enable staff and students to undertake placement safely.

Its aim is to ensure Business Units adopt a risk-based approach to the management of health and safety risks arising out of placement and sets out reasonably practicable actions to:

- Ensure the University fulfils its statutory and common law duties of care towards its staff and students, and
- Assist in making organisers of, and participants in, University placement activity sufficiently informed of the health and safety requirements to enable them to plan and participate safely.

## 2. Scope

This policy covers the safe and effective management of placements across all university business units.

This policy 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 nursing 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.

This policy excludes other forms of off-site working (e.g. fieldwork or agile working). See separate policy and guidance.

Each unit, which may be a Faculty, School, Department or Institute, will be referred to as Business Unit (BU) in this policy and should produce its own local arrangements on placement activities. Any local arrangements must meet all requirements set out in this policy. Where there is a discrepancy, the university policy takes precedence.

The Health and Safety Department has established a University Health and Safety Management System (HSMS). The system is detailed in Health and Safety Management Systems Framework (MAN1.1) alongside the University Health and Safety Policy and creates a framework for the organisational management of health and safety at the university. All University policies and guidance are written to account for and implement these arrangements.

### 3. Policy statement

The University Health and Safety Policy, alongside the Vice-Chancellor's Vision Statement sets out the university's drive and ambition for health and safety, including defining our principal aims for health and safety. These aims are to ensure legal compliance established as a baseline and that everyone strives for best practice.

### 4. Regulatory Background

- Management of Health & Safety at Work Regulations 1999 (MHSWR) - there is an absolute duty upon employers to undertake a suitable and sufficient risk assessment of work/study-related risks
- USHA Higher Education Sector – Health and Safety of Placement Guide 2018
- ISO 31030:2021 Travel Risk Management – guide for organisations

### 5. Definitions

#### Placement

Work/study placements that are accredited or integral the degree programme (e.g. clinical, year in industry, placement modules) and Work/Study Placements that are offered through a University of Nottingham managed scheme/initiative. Placements can be of any length, paid or unpaid.

- 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 the university which may not fall within this definition (e.g. volunteering activities, work experiences facilitated or recorded but not accredited by the university as part of a student's studies and placements that are wholly or partially funded by the university). Consideration should be given to the level of control the university 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.

Where there are other work experience opportunities taken up by the student, but they are not a requirement of their studies and are not funded or managed by the university, these are excluded from this policy.

**Placement provider:** The placement provider is the third party to whom, during the placement, responsibility for direct supervision of the student is transferred. The university can also be the placement provider if it is the organisation providing the placement.

**Placement organiser:** Any member of university staff who take on the role of managing the placement activity to whom authority is devolved for the placements of students with placement providers. (See further details in Roles and Responsibilities section below.)

## Risk Appetite

The risk appetite of an organisation is the level of risk that an organisation is willing to accept whilst pursuing its objectives and before any specific actions are determined to be necessary in order to reduce the risk.

In respect of travel associated with placement activity the University of Nottingham is willing to accept a moderate degree of risk in order to pursue its strategic objectives.

In the context of placements at the university, travel to high-risk countries and/or to carry out high-risk activity must be justified with robust controls in order to protect the health and safety of the student(s).

## 6. Roles and Responsibilities

General roles and responsibilities for health and safety are defined in the University Health and Safety Management System (HSMS) (MAN1.2 - Roles and Responsibilities). Specific responsibilities are detailed below and are considered to be in addition to the above. It is an expectation of university management to understand ownership and accountability. Roles identified below should be reflected in performance reviews to ensure safety alongside scientific endeavours.

### **The Travel Management Committee (reporting directly to the University Health and Safety Committee) will**

- Be the formal oversight and compliance committee for the university and will provide assurance to the University Health and Safety Committee
- Promote good practice among university staff and students in relation to the management of placements identified in this policy
- Ensure there is a plan for placement activity with clear objectives for ensuring continuous improvement and maintenance of good standards
- Communicate and consult on the management processes of all travel elements of placement activity
- Support the Health and Safety Department in considering any reports relating to compliance. This includes consideration of the detail of serious incidents and reports from any review or audits
- Review and make recommendations on placement-related training.

### **University Health and Safety Department will**

- Provide and keep updated, policy, arrangements, and guidance to ensure any statutory requirements for placement activity are met
- Provide competent advice and support on placement to the university
- Ensure appropriate oversight for compliance with the Placement Policy and provide reports to University Health and Safety Committee, Travel Management Committee and UEB

- Have oversight of health and safety training required for placement and ensure adequacy through routine review
- Monitor compliance with the university's health and safety policy and arrangements associated with Placements
- Have oversight of situations where there are non-conformities with placement requirements
- Report investigation findings following incidents or non-conformities to the University Health and Safety Committee and UEB
- Lead on and coordinate visits by external agencies, including the Health and Safety Executive
- Receive annual assurance reports from business units on placement
- Monitor business units are adhering to the university policy by carrying out audits (see University Health and Safety Monitoring Policy SAF-MAN3.1).

### Head of Business Unit will

- Lead by example to develop and improve safety culture e.g., ensure direct reports are implementing the placement risk management arrangements
- Ensure that following any significant incident or enforcement action that an appropriate investigation is undertaken, and any findings implemented
- Ensure that local management of placement activities meets the requirements as set out in university policy and associated arrangements
- Ensure responsibilities are delegated and understood for conducting and approving placement activity and that those involved have received sufficient training to be competent in doing so
- Ensure placement activity is incorporated as appropriate into strategic decisions
- Review performance of direct reports in terms of placement risk management
- Ensure that there is robust record keeping of placement documentation in accordance with university policy.

### Placement Organiser will

(Placement Organiser includes individuals or teams, either at business unit level or centrally within a professional service e.g. Study Abroad team.)

- Have a working knowledge and understanding of placement policy, arrangements, and guidance both at a university and local level
- Ensure that, where appropriate, suitable placement risk assessments are undertaken and approved ahead of the placement activity taking place
- Ensure that local resources are deployed effectively to ensure the placement process works effectively
- Monitor that placement risk assessments have been carried out, recorded, control measures effectively implemented and reviewed (including post placement)
- Confirm through formal agreements that the placement provider will supervise the student appropriately
- Where health and safety is being compromised suspend the placement activity pending a review of the placement risk assessment and involve the Business Unit Health and Safety Coordinator as necessary
- Report any significant failings relating to the placement risk assessment process to senior management



- Ensure that the investigation of any significant accident or incident includes a review of the relevant placement risk assessment(s).

### **Business Unit Health and Safety Coordinators (HSCs) will**

- Check that the local management arrangements for placement risk assessment meets the requirements of university policy and associated arrangements
- Ensure the local arrangements for placement risk assessment are recorded and communicated.
- Report on placement health and safety as needed to senior managers and the Business Unit Safety Committee/other local forum
- Support the review of placement health and safety relating to a significant accident, incident or enforcement action.

### **Placement providers will**

- Provide a clear outline of the job role and duties and/or a job description.
- Comply with all relevant health and safety legislation.
- Provide the student with an induction in the workplace health and safety arrangements, including fire precautions, specific hazards and health and safety precautions.
- Include the student in a risk assessment programme as it affects activities undertaken by them.
- Provide appropriate instruction and training in working practices and in the particular control measures identified in a risk assessment.
- Facilitate any visits to the student and Placement Provider undertaken by University staff during the placement.
- Provide ongoing supervision and training for the student in the performance of their duties.
- Ensure the University is notified of accidents or incidents involving the student that you are made aware of.
- Ensure that insurance is in place to cover liability for any injuries or ill health sustained by the student or any third party that is attributable to the activities of the student during the placement period (further details below).
- Ensure appropriate safeguarding checks are undertaken and evidenced.

### **Placement Students will**

- Conduct themselves in a safe manner so as not to harm themselves or other participants.
- Not commence placement activity without a reviewed and approved placement risk assessment in place (where required)
- Undertake any necessary pre-placement training as directed by the placement organiser
- Understand and comply with any instructions, codes of conduct or safety protocols given to them by the placement organiser and placement provider
- Comply with the Placement Provider's policies and procedures (including health and safety policies) and any relevant legislation
- Never intentionally misuse equipment or anything provided for health and safety reasons. Bring any health and safety, welfare or wellbeing concerns to the attention of the Placement Provider and their university contact as soon as possible

- Disclose any health condition which may have a bearing on their own safety or that of others on the placement activity
- Report any shortcoming or defects in the placement risk assessment control measures to the placement organiser
- Use any supportive technology that the university promotes to ensure their health and safety during their placement.

## 7. Selection of Placement Providers

To ensure a placement is suitable for the student, both from an educational perspective and a health and safety perspective, certain checks must be made prior to agreeing the placement to proceed. The university's expectations in relation to each placement provider managing a student's health and safety during the placement, must be confirmed as part of pre-agreement/contract checks.

Once it has been assessed that the placement is appropriate, an agreement between student, university and placement provider must be put in place to confirm arrangements.

To support the selection process, ensure that previous placements undertaken, are reviewed for any learning and take account of any feedback from relevant parties, including the placement provider and students.

## 8. Risk Assessments

**The risk assessment** process involves considering the placement provider and activity, the location of the placement and the specific student/s needs.

1. **Placement Activity** – The responsibility for risk assessing the actual placement activity predominantly sits with the placement provider in terms of accountability to the student. The placement provider is responsible for undertaking suitable and sufficient risk assessments and informing the students of the hazards, outcomes and control measures. **Pre-Placement visits** - in most cases these will not be required unless there are specific concerns that are best resolved by a visit and inspection.
2. **Location of the placement** – For overseas placement the student and placement organiser will need to consider the location where the placement is taking place and will use reliable third-party information (CHUBB World Aware/FCDO) to identify the status of country/specific region threats beforehand. (Threats may include crime, disruptions, civil unrest, terrorist threat, seasonal variations, current political situation, etc)
3. **Individual Risk Level** – The student and placement organiser will consider the experience, medical and health concerns, and protected characteristics of each individual that are relevant to the placement and its location.

**For non-activity elements of a placement**, i.e. covering points 2 and 3 above, the university must ensure a risk assessment is in place for the student. This is particularly important if the placement is undertaken in a country that is considered medium or high risk.

The following university templates can be used for recording a suitable risk assessment:

#### [Low Risk Placement Risk Assessment Form](#)

This form is to be applied for placement trips that are considered to be low risk for the following:

- **Country** – within the UK, or to countries that are rated LOW or MINIMAL risk by [Chubb World Aware](#) - ask your placement organiser to confirm that your choice of country is low or minimal risk,
- **Student profile** – the student(s) does/do not have any personal characteristics or health concerns which increase their risk (e.g. gender, religion, ethnicity, race, sexual orientation/LGBTQAI+ status, disabilities, or any health issues that could impact upon the placement and associated travel being undertaken).

**Approval** required by the Placement Organiser if modifying the master risk assessment form provided by the Health and Safety Department.

#### [Higher Risk Placement Risk Assessment Form](#)

This form is to be applied for placement trips that are considered to be higher risk for the following:

- **Country** – involves travel through and/or in countries that are considered to be MODERATE, HIGH or SEVERE risk by Chubb World Aware (see below)
- **Student Profile** – where personal characteristics or health concerns could increase a student's risk whilst on placement (e.g. religion, ethnicity, sexual orientation/LGBTQAI+ status, disabilities, any health issues that could impact upon the trip).

It is not expected that placements will be undertaken in high-risk countries as this is outside the risk appetite of the university but if it was felt this was justifiable, a more senior level of approval would be required, i.e. Head of School/Department and the Registrar.

**Approval** required as follows:

- For school or faculty-led placement programmes – the approver should be the HoS or their appointed person (e.g. placements manager).
- For university-led placement programmes – the approver should be the relevant Placement Team manager.

#### **University policy requires the following:**

- Risk assessments to be proportionate and subject to regular review to ensure validity
- Control measures to be clearly identified (see section below)
- Appropriate management approval of the risk assessment (see section below)
- The significant findings (residual risks) and control measures to be communicated to the student(s)
- Robust record keeping of placement risk assessments and associated documents
- Provision of safety-related information/training to prepare the student for the placement

The university requires the following key points, relevant to placement, to be considered:

## **Control measures** (mitigations to reduce risk)

Depending on the level of risk, the placement student, with the relevant approver, must agree and record what control measures are required to sufficiently mitigate the risks. The control measures identified must follow the hierarchy of control, be suitable and sufficient and must aim to keep participants healthy and safe as far as is reasonably practicable. They must be capable of being implemented by the placement student.

Additional or specialist controls may include:

- Preparation / Specific training for the student(s)
- Specific contingency plans
- Specific emergency procedures
- Monitoring and communication process(es) with students on placement.

## **9. Insurance Considerations**

The university does not provide travel insurance for student placements. Placement Organisers should advise students of the need to purchase suitable travel and medical insurance for the travel and duration of their placement.

Placement providers are responsible for having suitable insurance to cover the activities that students undertake and for which the provider has management control. Where a provider cannot assure they have suitable insurance, serious consideration should be given as to whether the placement proceeds. Due diligence checks of placement providers must include their insurance provision.

Advice on insurance in relation to placements may be sought from the university insurance team.

### **Waivers**

#### **United Kingdom**

UK law prevents parties contracting out of their liability for death or personal injury. If students are asked to sign waivers which exclude the organiser's liability for death or personal injury, the placement organiser should advise the student not to sign and the waiver should be challenged. In the UK it is illegal to exclude liability for death or personal injury. Further, the waiver may be an indication that the organiser has inadequate insurance in place.

#### **Outside of the United Kingdom**

Outside of the UK the legality of waivers that exclude liability for death or personal injury will depend on the law in the specific country. The laws around compensation and level of awards will be different to the UK and if a student suffers an injury arising from a placement provider's negligence and they have signed a waiver, they are less likely to receive compensation.

Placement organisers should advise students not to sign any waivers that exclude liability for death or personal injury.

## 10. Training, including Student Preparation

The university will ensure that all relevant staff who have responsibilities for organising and supporting students with placements, receive the appropriate level of training detailed below and are familiarised with this policy.

In addition, placement organisers must ensure students are suitably prepared to undertake their placement activity and the associated travel.

The table below defines specific requirements.

**Table 1: Training / Information Requirements for roles in relation to placement and associated travel**

<b>Role</b>	<b>Expected minimum experience and/or training</b> Note: UoN Travel Safety eLearning mandatory for all roles (available from Spring 2024)	<b>Supervised / supported by</b>
Placement Organisers (either within business units or central teams)	Able to demonstrate relevant experience and competence in the health and safety management of placement programmes and approval of related risk assessments. Evidenced through relevant CPD and Placements Community of Practice. Undertaken risk assessment training (eLearning or UoN short course).	Relevant Departmental Directors
University H&S Advisor(s) leading on Placements Safety & Operational Resilience Team	Able to demonstrate relevant experience and competence in providing advice to UoN stakeholders in relation to placement risk. Evidenced through relevant CPD.	Relevant Departmental Directors
Health & Safety Coordinators	Sufficiently familiar with this policy and UoN's travel management processes to enable them to support local placement organisers. Achieved through UoN training and information.	HoBU
Placement students	Suitably prepared to undertake their placement through relevant training, instruction and/or briefings. For overseas, undertake UoN Travel eLearning.	Placement organiser

Records of all training and instruction must be kept by the relevant business unit.

## 10. Monitoring

To ensure high standards of health and safety are maintained during travel and placement, university policy is to carry out monitoring (checks) of activities in accordance with the university's Monitoring of Health and Safety Performance (MAN3.1). Monitoring must be carried out at both Business Unit and University levels, records of monitoring must be kept robustly and the responsible person must ensure that actions are being followed up and completed.

## 11. Keeping in contact arrangements during the placement

Contact arrangements must be recorded in the placement documentation to ensure expectations are understood. This is to cover routine contact for general placement issues and student wellbeing, and in case of an incident or emergency that requires the university to support the student.

In relation to the health and safety of the actual placement activity, university contacts should seek feedback from students and in relation to the provision of induction and other training, supervision, issues of concern (e.g. the student is being expected to carry out unsafe practices or any incidents).

Feedback may also be sought from the placement provider, particularly where the student has expressed concerns.

If site visits have been carried out, the university contact should take note of any concerning observations and aim to resolve appropriately with the placement provider and the student.

## **12. Emergency Procedures and Contingency Plans**

These must be in place for all placements with the level of detail being proportionate to the location (particularly overseas placements) and the type of placement.

The details must be recorded, either in the risk assessment or as a specific document. All details must be communicated to the placement student.

## **13. Incident Reporting and Investigation**

Any incidents that take place during a placement must firstly be reported to the placement provider and then to the university contact. These must be added to the university online reporting system in order that there is a record of what happened, and the investigation undertaken.

Severe incidents are to be flagged to the relevant senior manager at the university for their support.

As part of reviewing placement incidents, investigation findings should be reviewed to ensure any learning is taken account of for future placement activity and lessons learnt with other placement organisers at the university.

## **14. Health and fitness for undertaking the placement**

Each placement student must be fit to undertake/participate in the travel and placement activity. In particular this is important for longer international trips. Where there are concerns, the individual should discuss these with their placement organiser and/or medical specialist and the university must ensure appropriate controls are in place.

There are also Fitness to Practice requirements for certain placement programmes (e.g. health care and veterinary programmes). Local procedures must be followed.

## **15. Equality, Diversity and Inclusion**

The Health and Safety Department and university health and safety community strongly support the university's commitment to Equality Diversity and Inclusion (EDI). An Equality Impact Assessment on

this policy and associated procedures has been carried out and can be viewed on the University of Nottingham EIA SharePoint site. Students with personal factors (e.g. health, disability, linguistic or cultural) which may require specific adjustments or support should have equivalent opportunities in choice of placements. Students must not be disadvantaged in undertaking placement unless there is a health and safety risk that cannot be adequately mitigated. This must be recorded within the risk assessment.