

ROYAL HOLLOWAY, UNIVERSITY OF LONDON

**THE HEALTH AND SAFETY OF STUDENTS WORKING OR
STUDYING IN THE U.K. OR OVERSEAS**

POLICY AND PROCEDURE

(Version 1)

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Introduction

Student work placements and study undertaken away from the College are essential elements of many degree programmes, the structure of which are likely to vary depending on the course of study undertaken. They enable students to gain work or study experience and particularly where undertaken overseas, to gain a deeper understanding of the language and culture of a country; they are, therefore, recognised as an essential part of the learning and personal development experience.

This Policy and Procedure has been developed to facilitate a risk-based approach to the management of work placements or periods of study in order that they may be undertaken in a safe and effective manner so that students can gain maximum benefit from them, normally away from the College. It identifies the standards to be implemented for their safety and in this respect, health and safety must be an integral feature, rather than a stand-alone part of the process of organising and experiencing work or study. The requirements of this Policy and Procedure must, therefore, be met before such activities may take place where they are either an integral part of a course of study at the College or facilitated by it as ‘added value’. The application of risk assessment and review of placements provides the basis for adopting measures that are suitable and sufficient for the risk identified.

The College will not endorse work or study undertaken outside of the parameters identified in this Policy and Procedure. Formal agreements to which the College is committed such as those under the Erasmus Student Charter and Quality Commitment will be subject to standards at least equal to those contained in this document. Directors and Heads of School/Department are, therefore, required to ensure compliance with its provisions.

Students who fail to attend risk assessment meetings or health and safety briefings without the prior agreement of a member of the academic staff, will be refused entry to work or study placements.

Supplementary Note Relating to the Faculty of Science Fieldwork Code of Practice

Within this Faculty, a Fieldwork Code of Practice exists exclusively for activities which fall within the definition and guidance of fieldwork provided by the Universities and Colleges Employers Association in: *Guidance on Health and Safety in Fieldwork – Including offsite visits and travel in the UK and Overseas*, as well as that contained in BS 8848: *Specification for the provision of visits, fieldwork, expeditions and adventurous activities outside the United Kingdom* (BS 8848:2007 + A1: 2009). Fieldwork will, therefore, be subject to the provisions contained in the above documents and the Universities and Colleges Employers Association document: *Health and Safety Guidance for the Placement of Higher Education Students* (2009) which has been incorporated into this Policy and Procedure. The Science Faculty *Fieldwork Code of Practice* does, therefore, form an integral part of this document.

Section 1 – Overview, Definition of Terms, Legal Implications and Staff Training

1.1 Overview

The term ‘placement’ or period of study refers to a period of work experience, paid or unpaid, or of study, where:

- The student is enrolled, or is directly/indirectly connected with, or maintains a formal association with the College during the period;
- It is undertaken as an integral part of the student’s course, or is in addition to, or formally associated with it;

- In the case of a work placement, there is the transfer of direct supervision of the student to a third party;
- The student is undertaking a period of study away from the College, either within the UK or overseas.

The potentially undesirable outcomes of a placement, particularly where not managed effectively, could be:

- A student could be injured or suffer ill health as a result of working at a placement provider's place of work.
- A student could be injured or suffer ill health while on a placement or period of study but not, for example, as a result of working at a placement provider's place of work.
- The actions of a student cause injury or ill health to others, damage to property, or loss of income or business.

Those responsible for student work placements or being involved in organising periods of study undertaken in the UK or overseas are advised that any statements made on behalf of the College by those acting for it in respect of its duty of care could significantly affect its criminal or civil liabilities. They must not, therefore, deviate from the requirements contained in this Policy and Procedure or make statements of intent that are not carried out. This includes statements in marketing material or briefings to students about, for example, the research the College undertakes on placement providers where it is later identified that these were not carried out. In the event of any clarification being required, contact the College Health & Safety Adviser or College Secretary.

1.2 Definition of Terms

The following terms are used throughout this document:

Placement Provider: the party to whom responsibility for the direct supervision of a student is transferred during a work placement; this could be RHUL if the College is providing the placement.

Workplace Supervisor: a person engaged by the placement provider who is designated to look after a student during a placement.

Placement Organiser/Study Supervisor: an RHUL employee to whom authority is devolved for the placement of a student with a placement provider or for supervising a period of study.

Placement/Visiting Tutor or Study Supervisor: a person formally undertaking on behalf of RHUL, visits to students on placement, or in the case of a student studying overseas, the member of staff assisting in the preparation of periods of study and being in periodic contact with them.

1.3 Legal Implications

In the event of an incident occurring, depending on the circumstances of the case, criminal or civil action could be taken against the student, the placement provider or its employees, or the College or its employees. It is, therefore, essential that the requirements laid down in this Policy and Procedure are adhered to.

Criminal Liability – placements within the UK will be subject to prosecution under health and safety legislation which may be directed at the placement provider, the student or the

College. The College Health & Safety Adviser will provide clarification. For placements undertaken outside of the UK, criminal liabilities will be subject to both the enforcing authorities and courts in the UK and in the country in which the placement takes place. Implementation of the requirements of this Policy and Procedure will, in the event of working abroad, address criminal liability under UK law for those who are not employees, in this case, students. Implementation of the requirements of this Policy and Procedure will, moreover, provide evidence in defence of charges of UK Corporate Manslaughter and Gross Negligence Manslaughter.

Civil Liability – adherence to the requirements of this Policy and Procedure will ensure that those acting on behalf of the College do so in accordance with the best possible advice. However, the nature and extent of civil liabilities between the College, placement provider and student and the nature and extent of civil liabilities to others who may be affected are subject to many factors which may only be resolved in the courts and may depend on which country's legal system is deemed to have jurisdiction. For further information, consult the College Health & Safety Adviser.

Study Undertaken Away from the College (including overseas)

Where a student is undertaking a period of study away from the College and it falls within one of the criteria identified on page 2 under 'Overview', the legal situation will be different to that which applies to the employer/employee relationship. While the law is clear in relation to the work situation, it is less so in respect of periods of study away from the College. Nevertheless, in such cases, those acting on behalf of the College should be able to demonstrate that they have taken such measures as may be necessary to exercise a reasonable duty of care to the student.

Work Placements or Study Undertaken Away from the College

Proving the duty of care has been duly exercised is likely to be dependant on adequately preparing a student for work or study away from the College, particularly where undertaken overseas in what may be an environment which is significantly different from that they have hitherto experienced. A risk assessment will assist with identifying the issues to be covered and preparation required. Wherever possible, students should go to locations which members of the College have personal and up-to-date experience of and are, therefore, able to identify the potential hazards and risks and the measures necessary to be implemented for their safety. Where this is not possible, staff and students should research the location and take the information gathered into account in the risk assessment process.

A risk assessment conducted by a 'Placement Organiser' or 'Study Supervisor' and the student will be the first step in identifying the measures necessary for the period of work or study to take place safely. All reasonably foreseeable hazards associated with it will need to be considered, from which the controls necessary will be implemented. Examples of the potential hazards to be considered will be those associated with travel arrangements, accommodation and personal security. From the findings of the risk assessment, the identified control measures will be implemented, including the provision of any necessary information, instruction and training to the student by College staff such as tutors, members of the College Health and Safety Office and the Head of Security. By adhering to these procedures, the student will be prepared, as far as is reasonably practicable, for the period of study and in doing so the College will have discharged its duty of care to the student. Section 2 below details step-by-step the procedures to be followed.

1.4 Staff Training to meet the Requirements of this Policy and Procedure

Staff involved in organising and supporting student work placements and periods of study will be provided with guidance and training on the College's relevant policies and procedures, including undertaking and implementing the findings of risk assessments, and their review. In this respect, academic staff play a significant health and safety role as their experience (subject-based) is likely to be highly significant for placements in potentially high hazard work/study environments.

Although a risk-based approach to work placements or periods of study requires the risk assessor, with the student, to make judgements, at times there may be no 'right' answer. The process identified in Section 2 is, however, designed to ensure that the risk assessor and student can demonstrate that they have considered the relevant issues and adopted appropriate control measures derived from the risk assessment process.

Section 2 – Procedures to be followed for Work Placements or Periods of Study Away from the College

The following sections can be used as a step-by step guide to the procedures to be followed.

Overview of the Stages:

Stage 1: Before the Placement or Period of Study Takes Place

Step 1: Undertake a Risk Assessment and identify the necessary control measures
Plan for Contingencies
Take into account insurance limitations

Step 2: Prepare the Student
Where possible undertake a pre-placement health and safety visit
(the need and frequency of follow-up visits will be determined from the risk assessment)
Ensure Each Party Understands their Roles and Responsibilities

Step 3: Approve the Placement/Period of Study

Stage 2: During the Placement/Period of Study

Step 4: Deal with health and safety issues
Identify the processes for raising and resolving problems
General Control Measures

Stage 3: After the Placement

Step 5: Post-placement or period of study review

Guidance on the above stages is given below:

Stage 1: Before the Placement or Period of Study Takes Place

Step 1:

Undertake a Risk Assessment and Identify the Necessary Control Measures

The College has a *Guide to Conducting 'General' Risk Assessments* document and has identified that only those who have undertaken training provided by a member of the College Health and Safety Office may carry out risk assessments. Risk assessments conducted in respect of student work and study placements will, therefore, be undertaken in accordance with this document, the findings of which must be recorded. Risk assessments must also be undertaken and recorded of equipment used during work/study.

The College *Guide to Conducting 'General' Risk Assessments* identifies that a hazard is something with the potential to cause harm, while a risk is the likelihood of harm occurring. If some of the health and safety factors in a risk assessment are judged to be of potentially high risk, it may not necessarily mean that a placement or period of study should not take place, but may require the implementation of additional control measures. Appendix A: (1) – (6) provide examples of completed risk assessments, which are illustrations only of how they should be undertaken. They contain indications of some of the issues to be covered and the control measures to be implemented. When undertaking risk assessment(s), those doing so should consult a member of the Health and Safety Office in the event that they require clarification of the process itself or assistance with identifying the control measures applicable to a specific placement or period of study.

Students, for whom health, disability, linguistic or cultural matters may require specific adjustments or support, should have equivalent opportunities in choice of work placements or periods of study. Staff will work with placement providers to ensure that access and support requirements are provided for students. The College encourages students with health conditions or disabilities that may require adjustments or support while away from the College to disclose them, or to agree for the College to disclose essential information when identifying possible providers but will not do so without the written consent of the student. Advice on managing placements for disabled students is available in the DfES publication *'Providing Work Placements for Disabled Students'*.

No placement or period of study overseas may take place in a location (including travel) which is contrary to advice issued by the Foreign & Commonwealth Office.

Plan for Contingencies

Through the individual Placement Organiser/Study Supervisor and their Head of Department, contingency plans must in place in order that in the event that a situation arises in which a student requires support, it can be provided so far as is reasonably practicable. This may be particularly important where the placement or period of study is undertaken overseas. For examples of contingency management arrangements, see the specimen risk assessments at Appendix A. Relevant insurance cover will be essential and the College Insurance Officer should be consulted for advice prior to an event taking place.

The Placement Organiser/ Study Supervisor will ensure their student is provided with a telephone number or e-mail address for contact in an emergency. Other relevant contingency plans will include issues such as measures for medical aid and possible repatriation following injury or illness and assistance in the case of loss of a student's property. Such contingency

arrangements must be maintained while students to whom they apply are on placement or study and will normally be covered by a suitable insurance policy.

Take Into Account Insurance Limitations

Insurance is the means of transferring risk by paying for the provision of professional support and financial recompense if things go wrong. Risk assessments must include consideration of the extent and limitations of the insurance arrangements of both the College and the placement provider, the contractual arrangements entered into and the legal requirements in the country or countries in which the placement will take place. In the case of a student undertaking a period of study, similar considerations will need to be applied. It will be useful to distinguish between those issues that can be considered by the College generally and those that are specific to a particular placement or period of study. In this way, appropriate insurance policy wordings can be put in place that will deal with most of the issues that may arise. The subject of insurance is explored further in Appendix B.

Step 2:

Prepare the Student

Students must be prepared for their work placement or period of study. Specifically, they must have information about the relevant health and safety risk factors and control measures in order that they are in a position to understand them, their role in risk management/avoidance and are able to make informed judgements. This is particularly relevant where the student is considering or being offered a placement or period of study in what has been established as being in a potentially 'higher' risk environment.

Providing they have been given adequate information, instruction and training, work placements or periods of study can be used to develop a student's ability to undertake their own risk assessments. In this respect, the College will provide students with information, or direct them to sources of information relating to health and safety risk factors and control measures (see sample risk assessments at Appendix A). The nature of a placement/period of study and extent of the hazards and risks identified to be associated with it will determine the information, instruction and training necessary.

In the case of work placements, pre-placement communication will be used to determine from the placement provider what levels of technical and professional competence are required of the student for them to be able to work safely. In such situations, the Placement Organiser will ensure that the student possesses these before the placement takes place. In doing so it will also ensure that they are able to gain maximum benefit from their experience, as well as being able to do so safely.

The Placement Organiser/Study Supervisor will provide or assist with the provision of the relevant information listed below for the student, before the placement or period of study commences.

Details of the work or study to be undertaken

Travel and transportation arrangements

Information on the location and/or region

General/environmental health information

The individual student in relation to the placement/period of study

The insurance limitations of the work placement/period of study

In all cases, students must be provided with the following information:

- Instructions about the general requirements and arrangements for the student to report any concerns regarding their health and safety while on the placement or period of study;
- Information on any additional issues or concerns highlighted by the risk assessment;
- A copy of the Placement Provider's expectations of the student and the preparation provided by the Placement Organiser.

A student must be made aware that the amount of information and possibly additional preparation and training they will need in advance will depend on the extent to which the placement/period of study is unusual, complex or involves potentially significant risk. A record will be kept of the information that is provided by tutors or students who have experience of the type of placement or of the placement provider and location of the period of study. Where the information is identified to be critical for the safety of the student, it will be necessary to establish if there is a need to test their understanding of information which is identified as essential.

The means of communication with the student while they are on the placement or period of study must be identified and communicated to them. It is, therefore, essential that the Placement or Study Organiser holds details of how the student can be contacted, together with next of kin contact details for use in the event of an emergency.

Pre-Placement Health and Safety Visit

A decision must be made on whether a pre-placement health and safety visit is required before a placement or where possible, period of study, can be approved. This may be particularly relevant where it is the College's first work placement with a particular organisation or is a first period of study undertaken in a particular location. However, in some cases this may not be required unless there are specific concerns needing to be resolved by such a visit. The DfES guidance *Providing Work Placements for Disabled Students* states that institutions may wish to visit the placement with the student or prepare the student for a meeting with the placement provider.

Pre-placement safety visits before approval of the placement are entirely separate from visits, which may contain a health and safety element, during placement.

Ensure Each Party Understands their Roles and Responsibilities

There are three parties to any work placement:

- The placement provider (in the event of a work placement)
- The student
- The College

In the case of a period of study, it will normally be the College and the student.

The Placement Provider must be notified of the College's health and safety expectations of them and raise any questions that need to be resolved in order for the Placement Organiser to approve the placement. These expectations and questions should be set out in a written document at the outset of the relationship and before any student commences their placement. Appendix C contains guidance on the content of such written communication. In addition, other questions may need to be included on issues arising from the risk assessment such as

insurance cover (see Appendix B), or information on residential accommodation if this is being provided by the Placement Provider. This document can be supplemented with other expectations regarding conduct and learning outcomes which can be found in the ASET Code of Practice (p.11) and information from relevant professional bodies and associations. Acknowledgement is required of the Placement Provider either in writing or electronically that they have received the written communication, accept its contents and have provided answers to any specific questions before the placement is due to commence.

It is essential that each party has a clear understanding of their roles and responsibilities and that this is in writing, shared and agreed between all and acknowledged, Appendix C provides information on the material to be covered in such an agreement. This understanding will be achieved by the exchange of written communication with the Placement Provider and the student clarifying the arrangements and responsibilities with regard to health and safety for the student, the Placement Provider and the College. The written communication will also identify the objective of the placement and other issues such as conduct and learning outcomes, including whether there are more specific objectives from the perspective of any of the parties, including any relevant professional bodies and associations. General information about the (non-health and safety) content of such written communications is available in the ASET Code of Practice (for contact details see page 11). The basic health and safety issues that should be incorporated into the written communications are set out in Appendix C. Additional roles may be incorporated depending on the conclusions of the risk assessment. A similar agreement to that for work placements should be applied to periods of study.

Step 3:

Approve the Placement/Period of Study

Before approving the placement or period of study arrangements, a review must be undertaken of any information and previous feedback the College has received. If a student(s) has previously been placed at the location, a check must be undertaken of whether there are any health and safety issues that remain to be resolved. If so, Placement Organisers/Study Supervisors must ensure that these are actioned before the placement or period of study takes place.

When the Placement Organiser is satisfied that the Placement Provider understands and accepts their roles and responsibilities, that there are no unresolved concerns and that all necessary actions have been completed, the placement may be approved. A record must be made of all relevant information, which will form the health and safety record of each student's work placement/period of study.

Stage 2 – During the Placement/Period of Study

Step 4:

Deal with Health and Safety Issues

When the student is undertaking a work placement or period of study, responsibility for looking after their health and safety rests with the student, Placement Provider and Placement Organiser. In the case of a student undertaking a period of study, this will essentially be the student and the Study Supervisor.

In the case of a work placement, students should be instructed to raise any concerns, in the first instance, with their Workplace Supervisor and then either through line management or with the local health and safety contact – the exact line should be established prior to the

placement. If any issue(s) is not resolved, then the student should raise this with the Placement Organiser. In the case of a period of study, this will be with the Study Supervisor.

On behalf of the College, it must be identified before the placement or period of study takes place if a Visiting Tutor, for academic purposes, will visit the student at the Placement Providers premises, alternatively, it will be identified why this is not necessary. Such visits will be used to assess whether there are any health and safety issues to be addressed. Placement Organisers/Visiting Tutors should be aware of their surroundings during these visits and raise any matters of concern observed, with the Placement Provider. The level of expertise of health and safety expected of a placement tutor will be dependant on their experience, training and discipline and the nature of the workplace. Suggested health and safety questions for visiting tutors are given below. Training will be provided by a member of the Health and Safety Office to undertake this task.

ACTIVITY	QUESTION	ACTION
General	How do you feel about the placement and your wellbeing?	Raise with Placement Provider contact any issues of concern.
Accidents and 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 issue with Placement Provider contact/manager. Discuss with College Health & Safety Adviser.
Training and Induction	Did you receive induction training? 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

Note: a member of the College Health and Safety Office should be contacted in the event of any situation arising upon which clarification is required by the Placement Organiser/Visiting Tutor.

Identify Processes for Raising and Resolving Problems

The Placement Organiser and Placement Provider must agree a process by which students and the placement provider can raise concerns in order that these can be resolved quickly and effectively.

The College encourages students to raise matters in the first instance with their Workplace Supervisor or the placement provider's health and safety contact. As part of the pre-

placement preparation, students must be informed how to report to the College any issues via their Placement Organiser/Visiting Tutor.

General Control Measures

Placement Organisers/Visiting Tutors must check that the following arrangements are in place:

- A process by which the student can raise 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 tutors and their resolution.
- Instructions for students on how to contact the Placement Supervisor/Study Organiser in the event of an emergency.

Stage 3: After the Placement

Step 5:

Post-Placement or Period of Study Review

Feedback from students on their return from a placement or period of study must be gathered and where relevant from visiting tutors, on health and safety issues experienced during the placement and how they were resolved. Tutors will undertake this process by checking and recording any concerns that were investigated and were either accepted or not upheld by the Placement Provider who took appropriate action to prevent recurrence. The conclusions of this review process should be fed back into future work placement/study risk assessments and used as part of the process of approval of placement providers or study locations. At least one formal meeting a year will be held for this purpose at departmental level involving those members of staff engaged in the work or study placement process; a senior member of the College Health and Safety Office may be asked to attend.

Section 3 – Departmental Compliance with this College Policy and Procedure

Each department's compliance with the requirements of this Policy and Procedure will be reviewed by members of the College Health and Safety Office during the health and safety audit process.

This Policy and Procedure forms part of the College's Health and Safety Policy.

Dr Richard Fisk
Health & Safety Adviser
Version 1
20/07/2011

Signed by the Principal, Professor Paul Layzell on 29th July 2011.

In accordance with the College's commitment to equality and diversity, this Policy has been written and screened to avoid discrimination and promote a positive approach to race, disability and gender issues. Comments on the content of this document should be directed to the College Health & Safety Adviser.

Appendices

APPENDIX A: SAMPLE RISK ASSESSMENTS

APPENDIX B : INSURANCE

APPENDIX C: CONTENT OF WRITTEN COMMUNICATION

Bibliography

DfES: *Providing Work Placements for Disabled Students*

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

Universities Safety and Health Association – www.usha.org.uk

ASET (The Work-Based and Placement Learning Association)
www.asetonline.org/index.htm