University Code of Practice

Placement Learning

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Contacts:	Head of Academic Quality and Learning
Applications for exemptions to:	Academic Quality and Standards Committee
Report exemptions to:	Academic Board

Summary/ Description:

This Code sets out the University's approach to, and requirements for, placement learning where a placement is an integral part of a programme leading to one of the University's higher education qualifications. Integral means that the placement, or learning derived from it, is summatively assessed and contributes to the achievement of the learning outcomes for the programme. The University's approach is informed by practice at a number of UK universities and by good practice guidance published by organisations such as ASET (the Work Based Learning and Placement Learning Association) and UCEA (the Universities and Colleges Employers Association) based in the UK.
The Code sets out the University's principles for placement learning, the most important of which is that the University has ultimate responsibility for the academic standards of its awards and for the

quality of learning opportunities provided to its students even when they are out on placement and subject to the immediate supervision and oversight of the placement provider (usually an employer).

The Code specifies the requirements for the approval of placement providers and of specific placement activities. Both will be considered through a risk assessment process which enables the University to focus its concerns on higher risk providers/activities, and therefore to make sure that the placement opportunity is suitable for students in terms of giving them a fair chance to meet the learning outcomes for the module as well as being a safe experience. The University, through the Student Services Manager, will maintain a database of approved placement providers.

The allocation of placements will be determined according to the individual programme and must be published in the approved programme specification. Allocation will also be subject to overriding principles including ensuring that any process of allocation is made known to students (at the University offer stage where they will be responsible for finding their own placement) and ensuring that students know what support will be offered to them in the allocation process.

Every placement must be recorded in a written placement agreement, signed by the placement provider, University and student, setting out the rights and responsibilities of each party. This agreement includes expectations of the student in terms of their conduct on the placement, and the support to be provided by the University and the placement provider. During the placement students remain bound by their obligations to the University and also entitled to access to University facilities as well as retaining their rights to use the appeals or complaints procedures. Students will be invited after the placement to provide feedback about the experience of the placement itself and how it has helped prepare them to meet the learning outcomes of the module.

All assessment of a student's placement activity, whether relating to learning or conduct on the placement or tasks completed following the placement must be clearly set out in the module descriptor and be provided to students before the placement. Where the placement provider is to be involved in the assessment process they must be provided with appropriate training and their judgements subject to internal and external moderation in accordance with the University's requirements set out in the Academic Regulations: Taught Programmes (QH:C1) and supporting Codes. The consequences of a premature termination of a placement, occurring for whatever reason, must be identified and appropriate action taken with the student properly informed of the actions to be taken, the reasons for those actions and their rights, including the right to appeal.

Further Guidance

See the Introduction to the Quality Handbook (QH:A1) for further guidance and explanations of:

- how the Handbook is designed to work and what it covers and does not cover
- how it is structured
- the 'external reference points' and established practice which have informed each of the Codes
- key concepts and themes
- some suggestions for further reading
- a quick guide to each Code, including definitions and things to watch out for.

This university Code has been written in accordance with the approach approved by the University to enhance clarity involving the following terminology: must = mandatory should = advisable may = desirable. Where these terms are used they are emphasised in bold.

TABLE OF CONTENTS

Table of contents 3
Introduction 4
Authority 4
Scope and definitions 4
Application to collaborative provision 5
Principles 5
Approval of placements 6
Risk assessment 6
Approval of the placement provider and placement activity 7
Placements in other countries 8
Responsibility for approval 8
Allocation of placements 8
Placement agreements 9
Support for students on placements 11
Prior to going on placement 11
Support while on placement 11
Returning from placement 12
Feedback from the student on the placement experience 12
Assessment 12
Premature termination of the placement 13
Reassessment 13
Record of placement providers 13

INTRODUCTION

Authority

1 The Academic Quality and Standards Committee is the final arbiter of the application and interpretation of this Code of Practice.

Scope and definitions

2 This Code applies to placements which are provided as part of a programme classified by Academic Board as taught and which leads to the award of the University's higher education qualifications (as set out in the Academic Regulations: Taught Programmes (QH:C1)).

3 Such placements **must** be integral to the programme, in that they are summatively assessed and thereby contribute to the achievement of the programme learning outcomes and are designed to lead to the award of credit within the programme. Placements are specifically those learning activities which take place in a situation provided by an organisation external to the University, whether an employer, charity or another education provider.

4 Placements therefore include periods of study at another University (such as a semester or year abroad), and include placements which are designed to enable students to acquire and demonstrate the competences of professional practise required as part of a programme to meet professional requirements (such as Nursing, Teaching or Social Work). They also include work-based learning (WBL): that is learning which is based in an employer-setting and where the student is regarded first and foremost as an employee rather than a student.

5 In all forms of placement, the immediate responsibility for the supervision and oversight of the student is transferred from the University to the placement provider, while the student remains an enrolled student of the University and is subject to the codes of conduct and procedures of the placement provider and of the University.

6 This Code does not apply to activities which might contribute to a student's employability development but which are not an integral part of the programme, such as:

(a) students who use their work experience to inform their programme
(b) part-time or vacation work which students have arranged for themselves and is not required by the programme
(c) field trips, educational visits and short periods of data collection outside the University for research purposes
(d) students who interrupt their studies for a period of time (such as a semester or year) to gain work experience or volunteering and for which any learning is not credited as part of the programme and during which period the student is not enrolled with the University but is permitted to resume their studies at the agreed end date of the interruption period. (see Academic Regulations: Taught Programmes (QH:C1)).

Application to collaborative provision

7 Unless specified by the Academic Board, this Code applies to all provision referred to in paragraphs 2-4 whether that provision is delivered by the University or another approved provider in accordance with a formal legal agreement.

PRINCIPLES

8 Any placement provision to which this Code applies is subject to the following principles:

(a) the University has ultimate responsibility for the academic standards of the award and for the quality of the learning opportunities provided during a placement – placements are therefore subject to the rules governing progression and the assurance and enhancement of quality set out in the Academic Regulations: Taught Programmes (QH:C1) and supporting Codes.

(b) the programme specifications and module descriptors and any related programme information (such as a prospectus, web-based advertising, programme/module handbooks) **must** make clear that the placement learning is an integral part of a programme, whether it is compulsory or optional, demonstrate how it contributes to the intended learning outcomes for the programme, and how it will be assessed

(c) any additional costs which will be incurred by a student undertaking a placement **must** have been made known to the student at the time the offer of a place on the programme was made (see Student Contract – Terms and Conditions (QH:E2))

(d) any responsibility on a student to find their own placement **must** have been made known to the student at the time the offer of a place on the programme was made (see Student Contract – Terms and Conditions (QH:E2))

(e) all placements and placement providers **must** be subject to a robust and proportionate risk assessment carried out by suitably qualified or experienced University staff, which ensures that the placement will provide an effective learning opportunity, a safe working environment and can deliver any individual needs of the student set out in their Statement of Reasonable Adjustments (approved by the University under the Code on Reasonable Adjustments (QH:E4))

(f) the rights and responsibilities of the placement provider, the University and the student **must** be clearly agreed, documented and be provided to each party prior to the commencement of the placement

(g) the attendance requirements of the placement (days, working hours, time off entitlement) must be made clear to the student in writing in advance of the placement commencing, along with any consequences of failing to comply with the attendance requirements

(h) the arrangements for supporting students on placement **must** be clear, including the extent to which University staff will visit the student at the placement site

(i) where an employer is to be involved in any form of summative assessment relating to the placement, that employer **must** receive, prior to undertaking any assessment, appropriate training on the University's requirements, including an understanding of the learning outcomes and grading criteria, and all such assessment must be marked and moderated

(internally and externally) in accordance with the University's Academic Regulations: Taught Programmes (QH:C1) and supporting Codes.

(j) the consequences for the student **must** be made clear in advance in the event that the:

(i) student is not provided with a suitable placement
(ii) student fails part or all of the placement module
(iii) student is unable to complete the placement for health or exceptional personal reasons
(iv) employer is unwilling to allow the placement to continue, for example due to the conduct of the student falling below that required by a code of conduct, including where the student's conduct has placed their own or other's health or safety at risk
(v) employer is unable to deliver the full placement for example due to industrial action, liquidation or as a consequence of the requirements of a regulatory body.

APPROVAL OF PLACEMENTS

Risk assessment

9 The overriding priorities in determining whether a placement with a specific placement provider can be approved by the University are, ensuring:

(a) the integrity of the academic standards of the University's awards
(b) the health, safety and well-being of the student and of those with whom the student will come into contact on the placement
(c) that, where applicable, the requirements of any professional, statutory or regulatory body can be met.

10 To achieve the above the University applies a risk management approach which also enables it to take a proportionate approach to each potential placement, makes the best use of the University's resources, and minimises the burden on placement providers. This approach is also under-pinned by ensuring that all parties involved in placements (placement providers, University staff and students) have a clear and shared understanding of their roles, rights and responsibilities in relation to all aspects of the placement and how it relates to the University programme.

11 The University's approach focuses on the six health and safety risk factors set out in the ASET Good Practice Guide for Health and Safety for Student Placements (2016, http://www.asetonline.org/resources/aset-good-practice-guides/):

(a) nature of the work
(b) travel and transportation
(c) location and/or region
(d) general/environmental health
(e) individual student
(f) insurance.

12 Programme Coordinators are responsible for undertaking a risk profile, typically including identifying whether, for each factor, the risk is 'high', 'medium' or 'low' and for identifying appropriate control measures. A site visit must be undertaken for the approval of all new placement providers designated as high risk.

Approval of the placement provider and placement activity

13 Approval of placements should be considered as involving two stages:

(a) approval of the placement provider
(b) approval of the specific placement activity at that provider.

Approval of placement providers

14 Approval of the placement provider is required to ensure the suitability of the location, premises and nature of the business of the provider. Each School of the University will maintain a database of its approved placement providers so that once a provider has been approved that approval will be valid for future placements subject only to:

(a) there being no significant changes in the circumstances of the provider (e.g. change in the nature of the business, change in management or change in/addition of a new location)
(b) the ongoing evaluation of the provider's suitability, for example based on feedback from students and from staff involved in visiting and supporting students placed at the provider.

15 Where, for whatever reason, a placement provider has not hosted a placement in the preceding three years, the risk assessment for the placement provider should be revisited to ensure it is still a valid assessment.

Approval of specific placement activities

16 Approval of the placement activity is a separate judgement from approval of the provider given the need to ensure that the learning experience which the student will gain is suitable for that individual student (including taking account of any reasonable adjustments) and will give the student a fair opportunity to meet the learning outcomes applicable to the placement.

17 Where the placement provider has previously been approved and that approval remains valid (bearing in mind the criteria in paras. 0 and 15) a separate risk assessment of the placement activity **must** be undertaken only to the extent that any of the six risk factors (in para. 11) are judged to be of higher risk for the placement activity or the individual student compared with the risk assessment conducted for the approval of the placement provider. A placement which will involve a student who is under 18 at the start of the placement **must** be considered at least 'medium' risk and the placement provider consulted as to whether such a student can be accommodated.

Placements in other countries

18 Where the proposed placement provider is based outside of Gibraltar the risk assessment process **must** pay attention to the implications of this, paying particular attention to:

(a) the arrangements to ensure health and safety at the provider (including where the country's health and safety laws are not comparable with those of Gibraltar/EU)
(b) the first language of the country is not English – either documentation must be translated into English or University staff must be fluent in the language in question or have access to sufficient translation facilities.

19 Where students are being allocated to a placement outside of Gibraltar staff must ensure that students:

(a) have sufficient oral and written competence in the language of the country to be visited to ensure that they can benefit from the experience
(b) are made aware that they will be subject to the laws and customs of the providing country
(c) are advised about practical matters such as immigration and insurance and seeking appropriate advice about compulsory and recommended preventative health measures, including vaccination requirements.

Responsibility for approval

20 The approval of placement providers is the responsibility of:

(a) the Head of Academic Quality and Learning for providers judged to be 'low' or 'medium' risk
(b) the Vice-Chancellor for providers judged to be 'high' risk.

21 The approval of placement activities is the responsibility of:

(a) the Programme Coordinator for placements judged 'low' risk
(b) the Head of Academic Quality and Learning for placements judged 'medium' or 'high' risk.

22 Approval of placement providers or placement activities designated as 'medium' or 'high' risk will only be considered where there are judged to be appropriate control measures identified and able to be put in place.

ALLOCATION OF PLACEMENTS

23 The responsibilities for applying for/allocating placements must be explicit and made known to students sufficiently in advance to ensure that appropriate arrangements can be made. Specifically, if students are:

(a) responsible for finding their own placement this must have been notified to them in writing when they were offered a place on the programme (as part of the Terms and Conditions of the offer; see Student Contract – Terms and Conditions (QH:E2))

(b) required to apply for a placement from a list of available placements, the process for applying, and the criteria for judging each student's suitability, **must** be notified to students in advance of the process commencing
(c) to be allocated places by university staff (whether in consultation with placement providers or not) this must be made known in advance, including whether and to what extent this is based on student preference or other criteria.

24 The process of allocating placements **must** be set out in the programme specification and be approved as part of the programme approval process (under the Code on Programme Approval (QH:C2)) and must ensure equality of opportunity for all students on the programme.

25 Where students are expected to apply for the placement, including for example attending an interview with the placement provider, the Programme Coordinator should advise students on the preparation and support that will be offered in advance – for example on CV writing, interview technique (including mock interviews or training sessions), or skills testing. The needs of students with a Statement of Reasonable Adjustments (SORA) approved by the University (under the Code on Reasonable Adjustments (QH:E4)) **must** be addressed, including reviewing whether the SORA sufficiently addresses the process of applying for a placement and remains current and appropriate for the proposed placement.

PLACEMENT AGREEMENTS

26 To ensure that the rights and responsibilities of all parties to a placement (provider, student and University staff) are clear about their rights and responsibilities in respect of the placement, a placement agreement **must** be signed by all three parties **before** the commencement of the placement. Such agreement **may** make appropriate reference to supporting documents (such as a [university] placement handbook, employer's handbook or similar).

27 Where a student will be under the age of 18 at the start of the placement, the student's guardian **must** be informed of the proposed placement, the information detailed below and be asked to counter-sign the placement agreement.

28 Prior to the three parties signing the agreement the following **must** be clear to the parties:

To be provided by the University Programme Coordinator
(a) the intended learning outcomes for the placement
(b) the employer's role in the assessment process (if any) including any report or feedback which the employer is required to give and the evaluation/grading criteria for such feedback
(c) arrangements for providing training for any member of the placement provider's staff who will carry out assessment
(d) any reasonable adjustments required to support the student, as set out in the Statement of Reasonable Adjustments, revised as necessary to reflect the placement. Placement

providers **should** be reminded that the responsibility to provide reasonable adjustments in the placement lies with them.

To be provided by the placement provider

(a) any code or equivalent document setting out the standards of conduct expected of employees and other users of the site where the placement will take place
(b) any guidance relating to how to ensure health and safety, and any specific health and safety rules (including protective clothing/equipment) and whether this is the responsibility of the provider or the student
(c) guidance on general behaviour and respecting cultural or religious norms (for example how to address colleagues, use of social media).

To be provided by the student

(a) any individual support needs where these have not already been considered prior to allocating the placement or were not anticipated prior to the placement being allocated.

29 The placement agreement **must** confirm:

(a) which member (or member(s)) of the placement provider's staff – by name and role – are responsible for the immediate supervision or mentoring of the student and for providing the student with induction on their first day at the workplace
(b) the duration of the placement including agreed working days and hours (whether fixed or flexitime)
(c) that the site on which the placement will take place is a safe environment which at least complies with health and safety legislation
(d) ownership of the Intellectual Property Rights (IPR) of work undertaken whilst on placement (if applicable)
(e) any specific responsibilities of each of the parties
(f) the duty of all parties to notify the others of anything which they believe will jeopardise the success of the placement
(g) whether the placement provider will be willing to provide the student with a reference following the placement.

30 Where considered necessary by the placement provider, the student **must** sign, and thereafter comply with, a confidentiality agreement. A copy of any signed agreement must be provided to the student and the Programme Coordinator.

31 Students **must** be reminded that while they are on placement they are still enrolled students of the University and therefore representatives of the University. They must therefore behave in a professional and responsible manner, and continue to be bound by the conditions of enrolment (Code on Recruitment, Selection and Admission (QH:C3)) including to notify the University of any change in circumstances relating to their eligibility to be a student or (if applicable) relating to their ongoing support needs.

SUPPORT FOR STUDENTS ON PLACEMENTS

Prior to going on placement

32 Prior to going out on placement, all students **must** be fully briefed on their rights and responsibilities. This information **must** be included in a Handbook(s) or equivalent and cover the following:

Programme specific information

(a) learning outcomes of the placement
(b) the learning objectives, progress reports/milestones and assessment
(c) the consequences of not completing the placement (see further below)
(d) any language or skills preparation available to them
(e) University support services and how to access them while on placement
(f) point of contact in case of emergency, including the University's 24 hour security phone number to be used in case of an emergency out of hours.

Generic information

(a) any University Code of Conduct for Students undertaking a placement
(b) the student's rights and responsibilities whilst on placement including their responsibility to seek out appropriate learning opportunities, to maintain contact with the relevant tutor, and to agree learning objectives with their supervisor (if applicable)
(c) cultural orientation and work expectations
(d) health and safety information and risks relevant to particular countries
(e) any occupational health considerations
(f) advice on practical considerations such as travel and finding accommodation (where applicable)
(g) any legal or ethical considerations (e.g. client confidentiality)
(h) the need for personal insurance cover
(i) developing professional skills, such as developing their professional network.

33 Programme Coordinators **should** consider, where possible, linking up students who have been on placements with those about to go on placements at the same placement provider so that experiences can be shared.

Support while on placement

34 Students **should** be supported throughout their placement and appropriate steps **should** be taken to ensure that:

(a) the student is meeting their personal learning objectives
(b) the student is satisfied with their placement and receiving adequate supervision
(c) sufficient progress is being made for the student to meet the learning outcomes of the placement
(d) adequate health and safety measures are in place
(e) where applicable reasonable adjustments are being provided as agreed.

Returning from placement

35 Appropriate arrangements **should** be in place to re-orientate the student to University life (taking into account the length and location of the placement).

Feedback from the student on the placement experience

36 Feedback **should** be sought from all students following the completion of their placement regarding their experience on the placement. This feedback **should** relate to:

(a) the experience of the specific placement – in particular to provide assurance or otherwise that the placement provider and placement activity are fit-for-purpose
(b) the experience more generally – to assist in evaluating the effectiveness of the placement as an element of the programme and its ability to help students meet the learning outcomes for the module and programme.

37 Consideration **should** be given to the best time to collect feedback (including whether to collect it in stages) so that the experience is still fresh in the students' minds but not too early that they have not completed the assessment and therefore cannot evaluate how well it prepared them for the assessment tasks.

Appeals and complaints

38 Students **should** be reminded that while on placement they remain entitled to use the University's appeals and complaints procedures where the matter is not something which can be resolved directly with the placement provider.

ASSESSMENT

39 The assessment of any module involving a placement **must** be conducted in accordance with the Academic Regulations: Taught Programmes (QH:C1) and supporting Codes, and specifically:

(a) the Code on Assessment Procedures (QH:C6)
(b) the Code on Boards of Examiners (QH:C9)
(c) the Code on External Examiners (QH:C10).

40 Any assessment involving the judgement of a placement provider **must** be internally moderated and a sample of work externally moderated. The marking criteria to be used by the provider and any other guidance must be available to the provider and the student in advance of the placement and be applied in assessing the work.

41 The student **must** be provided with written feedback on the placement provider's assessment of their performance, including how their performance could be improved on future placements or when entering employment post-completion.

Premature termination of the placement

42 Where a placement is prematurely terminated by the placement provider and is not the result of any misconduct on the part of the student, the Programme Coordinator **must** make appropriate arrangements to ensure that the student can be provided with an alternative placement experience and will have an equal and fair chance to achieve the module learning outcomes.

43 Where the placement had nearly been completed, the Programme Coordinator, in consultation with the student, may determine that the student still has an equal and fair chance to achieve the module learning outcomes and therefore no further action is required.

44 Where the premature termination of the placement is caused by the student (including through conduct falling below that expected of a student on placement or conduct putting themselves or others at risk) the Programme Coordinator must determine, in consultation with the Head of Academic Quality and Learning where appropriate, and after interviewing the student and consulting with the placement provider, what action to take. This should include considering whether an alternative placement should be offered (with or without an interruption of studies first), or whether action should be taken against the student either under the Academic Regulations: Taught Programmes (QH:C1) – such as exclusion from the assessment for the module – or under the University's Code on Student Discipline. Whichever actions are to be taken, the student must be informed of the actions, the reasons for them, their consequences and any right to a hearing or interview and/or to appeal.

Reassessment

45 Where the student fails a module which includes, or is based on, a placement, the arrangements for reassessment **must** have been made clear in advance of the placement. This **must** include whether new work is required based on the completed placement or another arrangement which is valid and reliable and gives the student a fair opportunity to demonstrate achievement of the learning outcomes.

RECORD OF PLACEMENT PROVIDERS

46 The Programme Coordinator is responsible for maintaining a database of placement providers for the programme, including adding new providers once they are approved in accordance with this Code and removing those who are subsequently deemed unsuitable or who indicate that they are no longer able to provide placements.

47 The suitability of placements must be monitored by the Programme Coordinator, taking into account feedback from students and from placement providers, as part of the monitoring and review of the programme and its constituent modules (under the Code on Programme Monitoring and Review (QH:C12)). Particular attention **should** be paid to:

(a) how successful placements are at enabling students to meet their intended learning outcomes

(b) the standard of support and guidance provided for students
(c) how effectively complaints are dealt with
(d) the standard of health and safety at placements.

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