

# Managing Health and Safety & Welfare of Students on Placement

## Code of Practice

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Date	Reason	Reviewer	Next review date	Approved by
01/11/2019	Review & update Northumbria Logo	John Hall	01/11/2020	Emrys Pritchard

## Introduction

Student placements are an essential part of many degree programmes and an important part of others, where they enable students to gain experience of work. Placements have very different structures – depending on the discipline and therefore, this code of practice has been developed in order that Northumbria University can satisfy all of the legal requirements relating to student placements and so that the placement process is not bureaucratic but is based on a sensible risk based approach allowing a lighter touch on placements with relatively low risks and a more rigorous control where the risks are higher.

This code of practice describes what is required in approving placements, preparing students for placement and supporting the students in terms of their health & safety on placement both in the UK and overseas and should be read in conjunction with the document published by Academic Registry, Placement Guidelines.

## Glossary of Terms

### *Placement:*

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

- If it is undertaken as an integral part of the student's course.
- Where the student is enrolled at Northumbria University during this period.
- Where there is the transfer of direct supervision of the student to a third party.

### *Placement provider:*

The placement provider is the third party to who, 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.

### *Workplace supervisors:*

Anyone engaged by the placement provider who is assigned to supervise or to look after the student during the placement.

### *Placement organiser:*

Any member of University staff to whom authority is devolved for authorising placements of students with placement providers.

### *Placement/Visiting tutor:*

Any individual employed by the University who visits students on placement.

## Scope

This code of practice is relevant to a wide range of placement types – whether they are in the UK or abroad and whether the placement is work based or study based at a partner University. It is also applicable for placements that are subject to professional standards and those involving significant hazards, such as construction or chemical industries.

There are a few groups for which additional legal requirements apply and where the general approach recommended in this guidance may not be sufficient. These are:

- Placement of students under the age of 18 since they are subject to more rigorous risk assessment under the Management of Health and Safety at Work Regulations;
- Placements to which specific contractual or legislative requirements apply, such as the placement of nursing-students and students on teacher training.

Other special cases that need separate consideration beyond the general guidance provided in this document include:

- Placements undertaken in the armed services; or
- Where a student acts in the capacity of a self-employed person and there is no transfer of direct supervision of the student to a third party.

## Legal Responsibilities

Under section 2.1 of the Health & Safety at Work Act 1974, the Placement Provider has primary responsibility for the management of the health & safety of the student whilst on placement and will be treated as equivalent to one of their own employees in relation to health and safety matters

Under section 3 of the Health & Safety at Work Act 1974 the University has responsibilities for non-employees – by implementing this code of practice the University will successfully discharge those duties.

Under sections 7 and 8 of the Health & Safety at Work Act 1974, the student has responsibilities to follow instructions and behave sensibly to protect their own health & safety and of others who may be affected by their actions.

For placements outside the UK, the criminal liabilities on each party will be a matter for the enforcing authorities and the courts in both the UK and in the country where the placement occurs.

Implementation of this code of practice will also provide evidence in defence of charges of negligence under UK Corporate Manslaughter or Gross Negligence Manslaughter legislation.

## Risk Assessment Process

The application of a risk assessment process provides the basis for adopting measures that are suitable and sufficient for the level of risk. A risk assessment should be carried out for every placement prior to commencement.

It is recommended that the following 6 health & safety factors which are applicable to all placements are considered in the risk assessment process.

<b>Health &amp; Safety Factors</b>
Work
Travel & Transportation
Location/Region
General/Environmental Health
Individual Student Capabilities
Insurance Limitations

### **Work factors:**

These relate to the placement provider and to the work that the student will be carrying out. They include the nature of the work-based hazards to which the student may be exposed. Control measures may include the professional knowledge and expertise of the student.

### **Travel and transportation factors:**

Driving and travel while carrying out the business of the placement provider can be a risk. Placements do not just involve the work carried out for the placement provider. Depending on the nature and location of the placement, the student may face significant health, safety and welfare issues associated with their travel to and from the placement and to and from their accommodation.

### **Location and/or region factors:**

The location of the placement can have considerable impact particularly if it is abroad in a country that the student is not acquainted with, though it could apply equally to international students enrolled at Northumbria and going on placement in the UK.

### **General/environmental health factors:**

The student may face significant health, safety and welfare issues associated with the environmental conditions in their place of work or the general location, their accommodation, or their food and drink.

**Individual student factors:**

Each student is an individual. Their health, knowledge, skills and experience and their personality could have an impact on health and safety in particular environments.

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. The Placement Organiser should work with placement providers to ensure that access and support requirements will be provided for the student when on placement. They should also encourage students with a health condition or disability that may require adjustments or support whilst on placement to disclose this, or to agree for the University to disclose information on this when identifying possible providers.

**Insurance limitations:**

Insurance is a means of transferring risk by paying for the provision of professional support and financial recompense if things go wrong. Any assessment must include consideration of the extent and limitations of the insurance arrangements of both the University and the placement provider, the contractual arrangements in place and the legal requirements in the country or countries where the placement will take place. It is useful to distinguish between those issues that can be considered by the University generally and those issues that are specific to a particular placement. In that way appropriate insurance policy wordings can be put in place that would deal with most of the issues that may arise.

# University Procedure

## 1. Planning the Placement

It is essential that all arrangements are planned in plenty of time before the placement to iron out any difficulties. The process should be documented at all stages and records kept.

Many Faculties have been organising placements for a number of years and have a great deal of experience to offer about the organisation. Similarly many placement providers also have prior knowledge of accepting placement students.

A risk profile and risk reducing table has been developed to assist with this process – this should be developed and tailored to suit the type of placements required in your Faculty. (See appendix 1) and a risk assessment form has been developed on which to record your findings. (See appendix 2)

The risk profile should be compiled with information from the student in the first instance with any supplementary information being sought from the Placement Provider. This information should be used to determine whether the placement is considered low, medium or high risk.

The risk assessment form should then be completed which will indicate if further action is necessary before the placement is approved. In most cases for low risk placements there will be no further action necessary.

In the cases of medium or high risk placements further measures may need to be considered – which might range from an enhanced student briefing, an exchange of risk assessments or a pre placement visit.

You should attempt to develop groups of placements that have similar risk profiles. This will particularly assist you in determining what type and level of action you need to take with regard to briefings, written communications and pre-placement safety visits.

The University needs to convey its expectations relating to the health and safety of the student to the prospective placement provider. It would be appropriate to include this information within a cover letter together with the health and safety checklist (see appendix 3 for suggested information that should be included in such a letter and appendix 4 for the checklist.). It is vital that the University can demonstrate that the information has been received and approved before the Placement is allowed to go ahead.

More work will be involved with a new placement provider to ensure they understand what is involved and what their responsibilities are to the student.

If a placement is self-generated by the student then they must inform the placement organiser immediately to enable all necessary checks to be carried out.

Placement organisers must also ensure that suitable insurance arrangements are in place. Further details are available from the University Finance Office.

The initial checks may flag up problematic areas such as the prospective placement provider being unable to fulfil the health and safety expectations or appropriate insurance cover cannot be obtained. Efforts should be made to overcome these with the placement provider.

However, if the University is not satisfied that the student's health and safety cannot be reasonably maintained then an alternate placement should be sought.

Some students are placed with organisations that are based in other countries. The organisation of such placements requires additional checks. There are a number of external factors outside the prospective placement provider's control that could affect the student's health and safety. These may include political or local unrest, ethical issues, and communicable diseases. It is recommended that guidance is sought from the Foreign & Commonwealth Office before and during the placement. Information is available on the following website: <http://www.fco.gov.uk/> (select 'Travel Advice' option) and <http://www.doh.gov.uk/home>.

It is also essential that the arrangements cover the necessary travel and accommodation plans. If the arrangements for the overseas placements are satisfactory then, the student briefing must be on a one-to-one basis and it is vital that emergency arrangements are made to get the student back to the UK if necessary.

Appendix 5 gives details of suggested briefing notes that Faculties may wish to use as part of a student briefing prior to their placement.

## **2. Preparing the Students**

The student should be prepared as far as practically possible for their placement and should be provided with information about relevant health and safety risk factors and control measures so that they understand the risks and can make informed judgements. This is particularly important where the student is considering a placement in a high risk environment.

In order to be capable of working safely when on placement it may be necessary for the student to have certain levels of technical and professional competency. In some professional posts such as chemistry, life sciences or engineering the placement provider may expect or require that the University has trained and assessed certain competencies relevant to health and safety.

Before they leave for the placement, students should receive a verbal briefing from the University and their attendance recorded. In addition, each student should be issued with the supporting guidance. See appendix 6 for details.

## **3. Monitoring of a placement**

The placement organiser must undertake some form of monitoring whilst the placement is taking place. The form of the monitoring will depend on the duration of the placement, the location, the type of vocational experience and the resources available in the Faculty. There needs to be regular feedback on all aspects of the placement, including health and safety, from the student and placement provider.



This may be achieved by telephone conversations or e-mails. It is recommended that there are observations and discussions during periodic tutor visits. There also may be other periodic contact by the institution with the student.

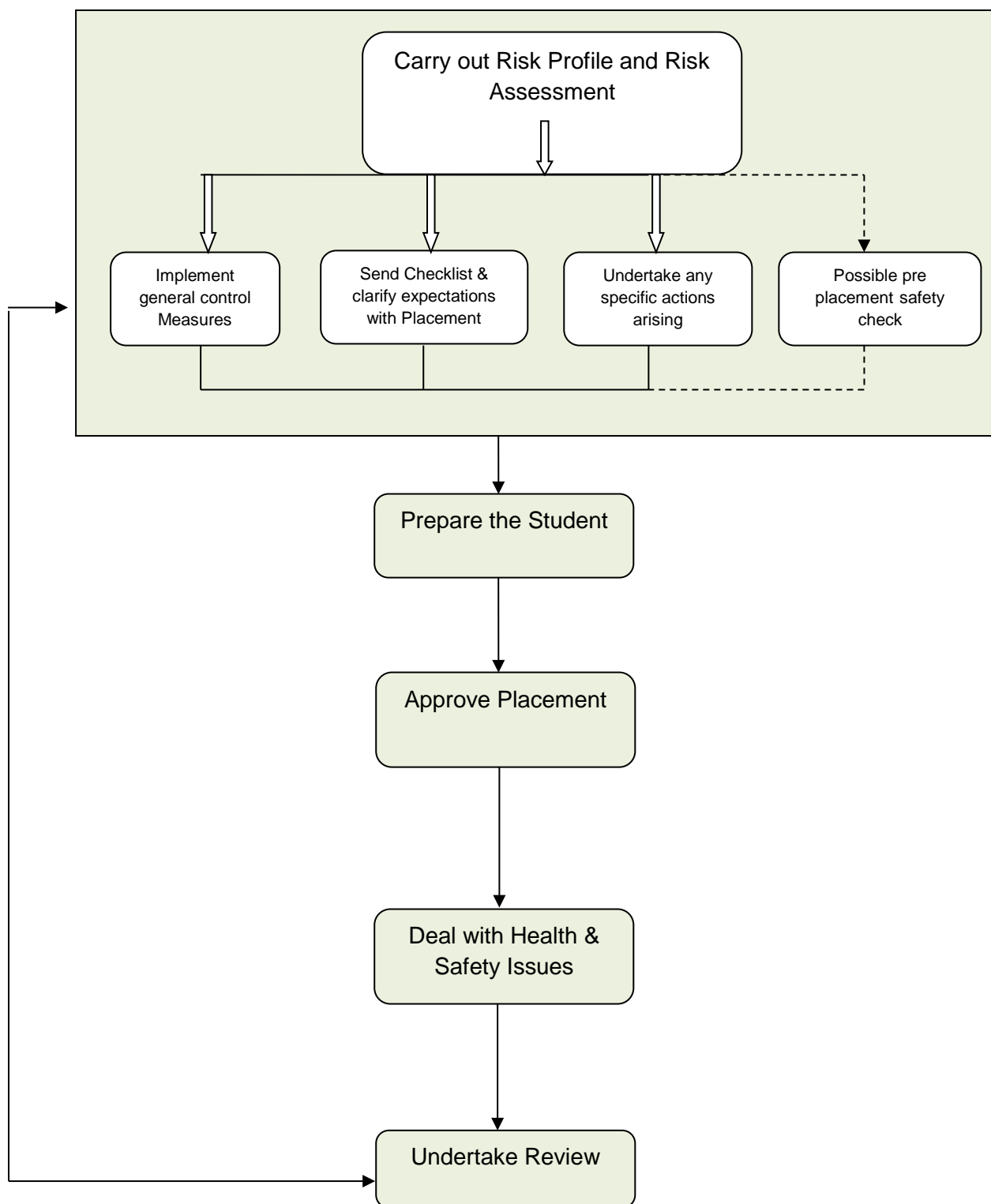
Monitoring the placement may highlight concerns by the student, placement provider or the tutor. Additionally, incidents involving the student should be reported to the University.

Negative feedback received during the placement must receive the appropriate level of investigation by the University. This will involve discussions with both the student and the placement provider, and could include seeking advice from other personnel within the institution (e.g. Health and Safety Adviser).

#### **4. Reviewing the Placement**

Reviewing a placement on completion can determine its health and safety suitability for future use. The review processes should include feedback from the student feedback from the placement provider and the level of co-operation by the placement provider during the placement process.

## Chronology of the Placement Process



## APPENDIX 1: Risk Profiling and Risk Reducing Actions

FACTOR	RISK PROFILE	INDICATIONS	ACTION TO REDUCE RISK
Work Factors	High	<p>Work with hazards that have potential to cause permanent injury or fatalities, including:</p> <ul style="list-style-type: none"> <li>• Construction site with work at heights, dusts, moving machinery, electrical systems.</li> <li>• Operation of machinery with mechanical hazards such as high speed rotating parts, crushing or entanglement risks.</li> <li>• Laboratory work with toxic/hazardous materials</li> </ul> <p>Community work with known high risk groups of clients or locations (drug abusers, homeless, violent patients)</p> <p>Work with animal bedding or large or dangerous animals</p> <p>Activities requiring specific licences or qualifications e.g. diving, flying aircraft etc.)</p> <p>Work involving significant hazards in small companies that do not have professional health and safety advice.</p>	<p>Seek confirmation from placement provider about expectations of student's prior competency in high risk activities and ensure student meets these.</p> <p>Confirm that training and supervision will be provided by the placement provider throughout the placement and include this in the written communication with the placement provider.</p> <p>Consider pre-placement site visit.</p>
	Medium	<p>Working in proximity to high risk factors (but not directly with them).</p>	<p>Seek confirmation from placement provider that the student will not be expected to participate in high risk activities, and will be appropriately supervised in medium risk activities. Include in the written</p>



FACTOR	RISK PROFILE	INDICATIONS	ACTION TO REDUCE RISK
			communication with the placement provider.
	Low	Office work or other low hazard environments and activities.	None.
<b>Travel and Transportation Factors</b>	High	<p>Significant travel to reach placement, prolonged or on local transport facilities known to be high risk (poor driving or vehicle safety standards).</p> <p>Demanding travel during placement. Student required to drive others in unfamiliar vehicles</p>	<p>Brief student on travel arrangements, discuss implications with them. Consider their experience. Get confirmation from them that they have relevant driving licences and insurances. Consider reducing risks by providing accompanied travel where practicable. Specify regular contact times.</p>
	Medium	<p>Night travel.</p> <p>Long daily commuting requirement. Student required to drive familiar vehicle in reasonable conditions.</p>	<p>Brief student on travel arrangements. Confirm that these are acceptable to them. Advise them to check that they have the necessary driving licences and insurances.</p>
	Low	<p>No significant travel, comfortable daily commute.</p> <p>No driving associated with placement.</p>	None
<b>Location &amp; Regional Factors</b>	High	<p>Significant risk of civil disorder, crime or similar danger (e.g. placement in war zones, countries where the Foreign and Commonwealth Office (FCO) advises against travel).</p> <p>Unavoidable lone or remote working in proximity to significant risk (e.g. medical student elective in a refugee</p>	<p>Check Foreign and Commonwealth Office restrictions and recommendations.</p> <p>Consult guides on appropriate behaviour, clothing, etc.</p>

FACTOR	RISK PROFILE	INDICATIONS	ACTION TO REDUCE RISK
		camp).  Medical and rescue services not available quickly or locally.  Means of communication likely to be difficult or compromised.	Arrange briefing/information to be provided in conjunction with someone with local experience or knowledge of conditions (e.g. student on previous placement or a placement practitioner at a local HEI in the overseas country).
	<b>Medium</b>	Higher than normal risk of civil disorder, crime or comparable danger.  Delays likely in communicating with tutors and others.  Placements abroad in areas identified as low risk by the FCO	Check Foreign and Commonwealth Office restrictions and recommendations.  Provide information to students on guides on appropriate behaviour, clothing, etc.  Supplement general briefing with information about medium risk factors.
	<b>Low</b>	Placements in the UK with no significant local risks.	None
<b>General Environmental health Factors</b>	<b>High</b>	Regional/local health risks require mandatory and specific health protection measures e.g. inoculations.  Very hot or strenuous working conditions (e.g. manual working outdoors in the sun).  Very cold working conditions (e.g. catering placement in a food cold storage/cook chill or freeze facility).	Consult occupational health for advice regarding immunisations and other preparations.
	<b>Medium</b>	Regional/local conditions require some	Consult occupational health or medical/health professional for

FACTOR	RISK PROFILE	INDICATIONS	ACTION TO REDUCE RISK
		precautionary measures, e.g. optional inoculations against diseases, medical travel kit is a sensible precaution.	advice regarding immunisations and other preparations.  A medical travel kit is a sensible precaution
	<b>Low</b>	No significant environmental health risks.	None
<b>Individual Student Factors</b>	<b>High</b>	<p>The student has personal factors (e.g. health, disability, linguistic or cultural) which may increase the risk of illness or accident during work-related activity even following adjustments.</p> <p>The student has personal factors (e.g. health, disability, pregnancy, linguistic or cultural) which may require specific adjustments or support if living away from home, or makes them susceptible to episodes of illness.</p> <p>The student's knowledge, understanding, and skills are low for the type of work.</p>	<p>Discuss activities of high risk with the student, try to eliminate or reduce them where possible.</p> <p>Engage with occupational health professional or disability support professionals to develop reasonable adjustments. Confirm these in the written communication with the placement provider.</p> <p>Consider pre-placement site visit.</p>
	<b>Medium</b>	The student has personal factors (e.g. health, disability, pregnancy, linguistic or cultural) which may require specific adjustments or support during work, or in social interactions at work.	Engage with occupational health professional or disability support professionals to develop reasonable adjustments. Confirm these in the written communication with the placement provider.
	<b>Low</b>	The student has no long-term medical conditions or disability likely to cause episodes of illness or require specific support whilst on placement. Student has relevant knowledge,	None

FACTOR	RISK PROFILE	INDICATIONS	ACTION TO REDUCE RISK
		understanding and skills for the type of work.	
<b>Insurance Limitations</b>	<b>High</b>	<p>Locations, activities and/or circumstances that are excluded from the HEI's travel and other insurance cover.</p> <p>Locations where the placement provider's insurance does not cover the student for personal or third party liability associated with the work by the student.</p>	<p>If locations, activities and/or circumstances are excluded from the HEI's travel and other insurance cover, consider alternative placements.</p> <p>If placement is to proceed, additional specific insurances may be available - consult the University Finance Department</p> <p>Brief student on limitations of insurance cover (the small print).</p>
	<b>Medium</b>	Locations, activities and/or circumstances that require prior acceptance from our Insurers before being covered.	<p>If locations, activities and/or circumstances require prior acceptance from our Insurers, ensure notification and acceptance is given.</p> <p>Brief student on limitations of insurance cover (the small print).</p>
	<b>Low</b>	<p>Locations, activities and/or circumstances that are automatically included in the University's insurance cover.</p> <p>UK locations (where the placement provider has employers' liability insurance cover).</p>	None



## APPENDIX 2: Risk Assessment Form

Placement Provider		Student	Start & end dates
Company:			
Location:			
1. General control measures		Action Necessary?	Action completed?
Has the placement provider confirmed receipt and acceptance of your written communication?	Yes/No		
Has this placement provider been used before and been reviewed with regard to health and safety?  If "yes" do any concerns remain unresolved	Yes/No  Yes/No		
Does the placement provider have a H&S Adviser	Yes/No		
Has the student received sufficient briefing?	Yes/No		
<b>2. Risk Assessment &amp; further specific actions necessary</b>			
	Risk Profile  H/M/L	Action Necessary?	Action Completed?





Work factors			
Travel & Transportation factors			
Location and/or regional factors			
General/environmental health factors			
Individual student factors			
Insurance Limitations			
<b>3. Conclusions</b>			
		<b>Action Necessary?</b>	<b>Action Completed?</b>
Is a site safety visit required?	Yes/No		
Are the risks tolerable such that the placement can be approved?	Yes/No		

**Prepared by:**

**Date:**

**Have the above actions been completed?**

**Yes/NO**

**I (print name):** .....

**Approve this placement**

**Signed**

**Date:**

## **APPENDIX 3: Suggested Information given to a Placement Provider detailing health & safety expectations.**

The purpose of the letter is to clarify expectations with regard to health and safety related issues for the student, the placement provider and the University and to seek any responses to specific issues raised by your risk assessment and control measures.

In order to fulfil our duty of care the University will: -

- Prepare the student for the placement and ensure they are aware of the general health and safety risk assessment, however this is of a general nature and does not include the specific information needed for any particular job or workplace;
- Give the student an opportunity to feedback to the University on any problems experienced with regard to health and safety whilst on placement and where appropriate appoint a visiting Tutor to carry out pre-arranged visits.

During the placement, we would expect our student to prove to be an effective, safe and reliable individual. However, during this period the student is under your control and it is the University's expectation that the Placement Provider will:

- Comply with Health & Safety legislation.
- Provide the student with an induction in the workplace health and safety arrangements, including fire precautions, specific hazards, health and safety precautions and how to report accidents, incidents and unsafe conditions.
- Include the student in the 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 the risk assessments.
- Provide ongoing supervision and training for the student in the performance of their duties.
- To enable the University to demonstrate it is duty of care to the student in respect of this placement please can you fill in the attached checklist.

## PLACEMENT HEALTH AND SAFETY CHECKLIST

Name of Employer: \_\_\_\_\_

Address: \_\_\_\_\_

Telephone: \_\_\_\_\_ Fax: \_\_\_\_\_

		Yes	No
1	Do you have a written Health and Safety policy?		
2	Do you have a policy regarding health and safety training for people working in your organisation, including use of vehicles, plant and equipment, and will you provide all necessary health and safety training for the placement student, including induction training in the first few days of employment?		
3	Is the organisation required to register with either of the Authorities below: a - the Health and Safety Executive b - the Local Authority Environmental Health Department If "YES" please give reason why and state the nature of your business:		
4	<b>Insurance</b> A - Will you maintain liability insurance for the period of each student placement? B - Will your insurer(s) cover liabilities incurred as a result of a student placement? C - If not (e.g. exemption permissible under the Employers' Liability Act (Compulsory Insurance) 1969), do you have access to funds to pay for any liability dispute and compensation awarded?		
5	<b>Risk Assessment</b> a - Have you carried out a risk assessment of your work practices to identify possible risks whether to your own employees or to others within your organisation? b - Are risk assessments kept under regular review? c - Are the results of risk assessment implemented?		
6	<b>Accidents and Incidents – Reporting accidents and ill health is a legal requirement.</b> a - Is there a formal procedure for reporting and recording accidents and incidents in accordance with RIDDOR? b - Have you procedures to be followed in the event of serious and imminent danger to people at work in your undertaking? c - Will you report to the university <i>all</i> recorded accidents involving placement students? d - Will you report to the university any sickness involving placements students?		
7	Where multiple branches exist. Does your Health and Safety policy and procedures extend to all of your branches?		
8	Are you aware of your responsibilities for disabled students regarding the Disability Discrimination Act? If you need more information on this we can provide you with some useful websites.		

**Contact Personnel:**

Who is your nominated contact for compliance with the requirements of health and safety legislation in your company?

Name and position: \_\_\_\_\_ Tel: \_\_\_\_\_

Email address: \_\_\_\_\_ Fax: \_\_\_\_\_

The above statements are true to the best of my knowledge and belief.

Signed: \_\_\_\_\_

## APPENDIX 5: Suggested briefing notes for the Faculty in preparation of students prior to going on placement.

### **ALL Placements** (can be delivered either one-to-one or group basis)

- The students' health and safety responsibilities.
- Health and safety responsibilities of the placement provider.
- Health and safety induction:
  - The importance of receiving this.
  - When it should be given (emergency arrangements, reporting of incidents etc.).
  - Topics that must be covered.
  - Action to take if not undertaken.
- Health and safety information, instruction, training and supervision as the placement progresses.
- Assessing and managing risks for activities they will undertake.
- Monitoring and providing feedback.
- Action to take if they have any health and safety concerns.

### **EU & International Placements** (delivered on a one-to-one basis)

- Travel arrangements: -
  - Scheduled flights, travel to and from placement location.
  - Accommodation
  - Health effects of long-haul travel (jet-lag, very fatigued) and how to avoid
- Personal safety: -
  - 'No-go' areas, areas of high crime
  - Safe use of public transport, taxis etc.
- Climatic conditions: -
  - Normal weather for area (e.g. higher temperatures, arid conditions, extreme winters) and precautions to take
  - Difference with those experienced in the UK
- Health risks and up to date vaccinations: -
  - Venomous animals and insects
  - Contagious diseases
  - Vaccinations up to date
  - Contaminated drinking water and food
- Cultural differences: -
  - Accepted behaviour
  - Local laws and religions
  - Likely communication difficulties
- Obtaining medical or other emergency assistance: -
  - Correct insurance in place

Local healthcare arrangements  
Local emergency services' contact number(s)  
Contacts back in UK

## **APPENDIX 6: Suggested Information for Students prior to taking up a placement**

Going on placement is an integral and important part of your studies. However, there is a necessary process to be undertaken to ensure whilst on the placement your health and safety is protected. This process applies to all placements whether in the UK, EU or international.

Most of the responsibility rests with the organisation providing your placement, and they must ensure that the activities you perform do not expose you to risks to your health and safety.

The University has informed them of this obligation and has also undertaken a risk assessment and a series of checks to ensure your health, safety and welfare whilst on the placement. It is also equally important that you are fully informed of your role.

If you have identified a placement and begun the process of confirming with your placement provider, inform your placement organiser immediately so that the process below can be carried out.

The process will follow these steps:

- 1) Your placement organiser will write to the placement provider informing them of their responsibilities for ensuring your health and safety and asking them to complete a health and safety checklist.
- 2) If, for any reason, the placement provider cannot meet their health and safety responsibilities then the placement may be withdrawn or further discussion take place.
- 3) You must inform the placement organiser of any health issues, including any disability, which may affect the placement. This will be treated in confidence.
- 4) The placement organiser will supply you with information on health and safety prior to the placement starting.
- 5) Whilst on placement, if you have any concerns regarding your health and safety you must inform your tutor or placement organiser as soon as possible. This may lead to the placement being reviewed by the placement organiser.

- 6) Your tutor/placement organiser may visit whilst you are on a placement, if they have any concerns they will inform you and this may lead to the placement being reviewed by the placement organiser.
- 7) When the placement ends your tutor or placement organiser will ask for some feedback to ascertain whether the placement is suitable for other students.

If you have any questions contact your Faculty placement organiser.

**Further Information & References**

Northumbria University, Academic Registry – Placement guidelines (August 2008)

UCEA, 2009 - Health & Safety Guidance for the placement of Higher Education Students.

ASET, 2010 – Health & Safety for Student Placements – Volume 3