

# **Learner Placement Policy**

| Policy Title:     | Learner Placement Policy                             |
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|                   | Director of Student Services, Safeguarding & Support |
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| Related Policies  | Safeguarding & Child Protection Policy               |
| & Procedures:     |  |



## **Equality Impact Assessment Tool**

## Name of Policy: Accident/Incident procedures

|   |  | Yes/No | Comments |
|---|--|--------|----------|
| 1 | Does the policy/guidance affect one group less or more favourably than another on the basis of:      |        |          |
|   | Race or ethnicity  | No     |          |
|   | Disability   | No     |          |
|   | Gender   | No     |          |
|   | Religion or belief   | No     |          |
|   | Sexual orientation   | No     |          |
|   | Age  | No     |          |
|   | Marriage and Civil Partnership   | No     |          |
|   | Maternity and Pregnancy  | No     |          |
|   | Gender Reassignment  | No     |          |
| 2 | Is there any evidence that some groups are affected differently?                                     | No     |          |
| 3 | If you have identified potential discrimination, are any exceptions valid, legal and/or justifiable? | N/A    |          |
| 4 | Is the impact of the policy/guidance likely to be negative/  | No     |          |
| 5 | If so, can the impact be avoided?  | N/A    |          |
| 6 | What alternatives are there to achieving the policy/guidance without the impact?                     | N/A    |          |
| 7 | Can we reduce the impact by taking different action?   | N/A    |          |

## This policy is particularly relevant to:

- All staff involved in arranging any type of placement or work experience
- Heads and Directors
- Progress Tutors
- Work placement administrators
- Link Tutors
- Vocational teams delivering study programmes

## Suffolk New College Learner Placement Policy

### 1. Policy Statement

- 1.1 Irrespective of where it is delivered or who learners are placed with, Suffolk New College aims to ensure all learners enrolled on full time study programmes, where appropriate, have an opportunity to access meaningful external work experience or industry placement and be placed in a safe and healthy working environment. All learners are expected to undertake work experience or work-related training as part of their study programme. The vast majority of learners will undertake this with an external employer that enables learners to experience the real demands of the working environment, independent from their peers and their tutors and put in to practice the transferable and sector specific skills they have learned.
- 1.2 Common principles of a high-quality work placement are that it:
- is purposeful, offers challenge and is relevant to the young person's study programme and career aspirations
- allows the learner to apply the technical and practical skills learned in the classroom/workshop
- is managed under the direction of a supervisor to ensure the young person obtains a genuine learning experience suited to their needs
- has a structured plan for the duration of the placement which provides tangible outcomes for the learner and employer
- has clear roles, responsibilities and expectations for the learner and employer
- is followed by some form of reference or feedback from the employer based on the young person's performance

(Source: 16 to 19 study programmes guidance: 2024 to 2025 academic year - GOV.UK (www.gov.uk))

## 2. Scope

2.1 Learners in scope are those undertaking a study programme age 16-19 within any campus location, those of any age on a training programme that includes mandatory placement hours and those aged 19 to 24 years old with an Education, Health and Care (EHC) Plan.

#### 3. Definitions

### 3.1 Learner Placement

Within this policy, the phrase "learner placement" is inclusive of all types of work experience and T Level placement.

### 3.2 Work-related Activity

Suffolk New College refer to internal activity involving staff who develop learners work-ready skills as work-related activity. It includes internal work tasters, running a learner enterprise, undertaking work-related projects and attending guest speaker events. It may be planned for learners where external placement is not yet suitable.

## 3.3 Work Experience

This is a short-term or extended work placement with an employer that complements the other elements of a study programme. The study programme guidelines identify short-term work experience as a 30-hour component, which may be adjusted in line with the sector. An extended work placement includes T Level placement and where awarding body hours are stipulated that take place in an environment outside the direct control of Suffolk New College for greater than 10 days.

### 3.4 T level Placements

These placements are a minimum of 315 hours in length and can include up to 35 hours of work taster activities. The placement must be 100% in person with an employer and delivered outside of the provider setting.

## 4. The College measures

- 4.1 In order to ensure that learners are placed in a safe and healthy working environment, the College will, so far as is reasonably practicable, take the following measures:
  - Ensure that learners have been made aware of and have understood the relevant hazards linked to their vocational training.
  - Ensure compliance with Health and Safety legislation including that which is specific to young people, the Working Time Regulations and, where appropriate, new and expectant mothers.
  - Ensure the placement provider (employer) is aware of responsibilities to safeguard the health, safety and welfare of all learners on learner placement in particular young people and vulnerable adults.
  - Make the placement provider (employer) aware that under health and safety law, work experience learners are employees during the time of their learner placement.
  - Take all reasonable steps to ensure the learner is suited to the placement on offer.

# 5. Health and Safety Requirements for employers and the College prior to learner commencing work experience/placement

### **Employers**

5.1 The employer has the main responsibility for the health and safety of learners whilst on work experience or a placement. While education or training providers must satisfy themselves that an employer has assessed the

associated risks to workers under 18 on their premises and has suitable and sufficient risk management arrangements in place, checks must be kept in proportion with the risk environment. For low risk environments, assurance can be gained through a conversation with the employer. A physical inspection by education providers, or requiring the employer to complete lengthy forms, is not necessary.

(Source; 16 to 19 study programmes guidance: 2024 to 2025 academic year - GOV.UK (www.gov.uk)

5.2 Under Health and Safety at Work etc. Act 1974, 'It shall be the duty of every employer to ensure, so far as is reasonably practicable, the health, safety and welfare at work of all his employees'. As part of this, there are certain considerations that need to be made for young people.

(Source; Health and Safety at Work Act 1974)

5.3 Health and Safety Executive (HSE) guidance states that: 'As an employer, you should already be managing any significant risks for all workers in your workplace. But you should assess any additional factors if you employ a young person, such as a health condition which may be affected by the work or the work environment'. Schools and colleges, or those organising placements, should simply ask sensible questions, in proportion to the level of risk, to satisfy themselves that those arrangements are in place.

(Source; HSE Young People at Work)

- 5.4 The employer is required by law to protect their employees, and others, from harm. Under the Management of Health and Safety at Work Regulations 1999, the minimum the employer must do is:
- identify what could cause injury or illness in your business (hazards)
- decide how likely it is that someone could be harmed and how seriously (the risk)
- take action to eliminate the hazard, or if this isn't possible, control the risk.
- 5.5 Under sections 3(4) and 19 of the regulations, an employer has a responsibility to ensure that young people employed by them are not exposed to risk due to:
- Their lack of experience
- Absence of awareness of existing or potential risks and/or
- Learners have not yet fully matured

(Source; Management of Health and Safety at Work Regulations 1999)

## An employer must consider:

- the layout of the workplace
- the physical, biological and chemical agents they will be exposed to
- how they will handle work equipment
- how the work and processes are organised
- the extent of health and safety training needed
- risks from particular agents, processes and work
- ensuring supervision is conducted by a competent person

(Source: https://www.legislation.gov.uk/uksi/1999/3242/regulation/19)

- 5.6 It is not necessary for employers to complete a separate risk assessment specifically for placement learners, as long as a current risk assessment for employees already considers specific factors for young people.
- 5.7 There is no requirement for employers to re-assess risk each time they take on a new placement learner providing:
  - the nature of the work undertaken and the level of risk has not changed
  - the new learner has a similar level of maturity and understanding
  - the learner has no identified particular individual needs, which need to be considered. (The organiser or parent should tell them if they have.)
- 5.8 If an employer has not previously had a learner on placement they must ensure their current risk assessment takes into account the:
  - type of work the learner will be requested to undertake
  - individual needs of learner and level of experience/ maturity/ physical ability
  - the level of risk and if this is acceptable
  - induction for the learner: including safe use of equipment; what to do in emergency
  - provision of a PEEP and training on use
  - Health and Safety guidance prior to commencing work experience.

Young people and work experience – A brief guide to health and safety for employers is available via this link: https://www.hse.gov.uk/young-workers/employer/index.htm

Placement providers (employers) is available via this link: <u>16 to 19 study programmes</u> guidance: <u>2024 to 2025 academic year - GOV.UK (www.gov.uk)</u>

5.9 The insurance industry has agreed that learners on work experience placements should be treated as employees for the purposes of insurance. They will be covered by existing Employers' Liability Compulsory Insurance policies. An employer, or voluntary sector organisation, that has Employer's Liability Insurance cover already, does not need to buy additional cover. If the voluntary organisation only has Public Liability Insurance, they will need to obtain temporary Employer Liability Compulsory Insurance for the duration of the placement.

(Source: 16-19 study programmes guidance 2023-2024 academic year)

### The College

- 5.10 **The College** needs to take reasonably practicable measures to arrive at an informed opinion about the health, safety and welfare arrangements at the learner placement and to assess the suitability of the placement provider. These measures depend on the risks associated with the work experience.
- 5.11 **The College** must also do what is reasonably practicable to ensure that learners are not placed in a working environment where there are significant risks to their health & safety. In doing so, it must assess the risks to young people before they start work experience

5.12 **The College** will take reasonable steps to satisfy themselves that any work-related risks to the learner are managed by the employer.

The College will seek to obtain placements that offer the learner:

- A relevant and meaningful experience that covers a reasonable range of activity.
- b) An induction to the workplace.
- c) A safe working environment.
- d) Relevant current insurance cover.
- 5.13 In the case of child-minders the College will only place learners with a qualified/registered child-minder who has been visited/registered with the local authority.
- 5.14 For short term work experience in low risk environments or for existing employers who have previously supported learners on work experience the College will communicate to the employer confirming that by accepting the learner on work experience placement the employer is making a declaration that they:
  - have in place appropriate health and safety practices including suitable and sufficient risk assessments;
  - take young people's individual needs, maturity, experience and physical ability into account when allocating roles and/ or work activities to be completed;
  - are confirming that they have valid Employers Liability Insurance in place.
  - 5.15 For industry placement or for short term work experience when a new employer is approached to provide a work experience placement for the first time the College should:
    - Request a copy of the young person's risk assessment
    - Request a copy of Employer Liability Insurance (ELI). This must be current for the full period of the work experience.
    - Identify any additional checks that may be required prior to the work experience being undertaken

Please refer to the link below for further guidance on what information about low risk and higher risk environments and individual needs of learners.

(Source; https://www.hse.gov.uk/young-workers/employer/risks.htm)

For learners who have individual needs (medical, behavioural, learning or support needs) the relevant Head will ensure:

- Information about the learner's individual needs, deemed relevant to supporting effective learner placement, is shared with the employer prior to placement commencing. Information will be uploaded to the College system
- Employer liaison will occur to share relevant information about the learner's individual needs

 Employer discussion will occur relating to implementing an induction to adequately prepare the learner for their placement and include reasonable control measures.

## 6. Preparing learners for placement

- 6.1 The College will support the learner in developing employability skills prior to the learner placement. This will be undertaken through a range of methods including activities within professional development (PD) sessions, tutor-led sessions, and e-Pass.
- 6.2 The learner code of conduct relevant to appropriate behaviours and attitudes whilst on learner placement will be within the Steps to Success programme.
- 6.3 Learners will be notified of key information for their first day of placement.
- 6.4 The College will confirm the placement details to the next of kin, where relevant.

### 7. Recording and monitoring placement

- 7.1 Short-term placement, will not require on-site monitoring unless it has been pre-determined that this is essential, or there are significant changes to circumstances that give rise to this requirement.
- 7.2 Extended placements will require a mid-review by the relevant Directorate. This may be in the form of a visit, video conferencing, or other employer communication. Placement review records will be retained. Where the placement requires assessment to meet awarding body standards the person appointed to assess learner progress will visit the setting in line with requirements and records will be maintained in accordance with awarding body stipulations.
- 7.3 The Progress Tutor will review individual progress against placement via progress reviews.
- 7.4 Next of Kin will receive placement update via pro-monitor reporting.
- 7.5 Learners will normally record their placement hours on a regular basis via the Grofar system for the employer to validate.
- 7.6 The learner and the employer will provide feedback at the conclusion of the placement.

### 8. Keeping learners safe on placement

8.1 Suffolk New College takes its safeguarding responsibilities very seriously, recognising our statutory duty to provide a safe and healthy environment for learners whether they be in college or out on placement (Keeping Children Safe in Education, September 2024). The duty placed on us to protect our learners from instances of physical, emotional, sexual or institutional abuse means that we expect learners to be able to work in an environment that is free from all forms of harm (including online harms):

- Abuse
- Bullying
- Harassment
- Discrimination
- Exposure to radicalising influences including extremist narratives and ideologies.
- 8.2 We encourage our learners to report to us if they are made to feel uncomfortable by actions or words and / or any incidents (including online) that occur whilst they are on placement.
- 8.3 College staff organising placements expect employers to:
  - Promote an environment where any form of abuse, bullying, harassment or discrimination (including online) is unacceptable and never tolerated
  - Create an environment where radicalising ideologies are challenged and not permitted to flourish
  - Have policies and procedures in place to protect children, young people and vulnerable adults from harm (including online)
  - Listen and respond to any complaints, allegations or suspicions of abuse, responding to any incidents in accordance with appropriate procedures.
- 8.4 When assessing the suitability of a placement, college staff will take child protection and safeguarding into account in circumstances where:
  - The placement lasts for more than 15 days as a block placement
  - The placement lasts for more than 15 days, over 15 weeks as an extended placement
  - The learner is considered vulnerable (e.g. those who have special educational needs), regardless of the length of placement
  - There is substantial isolated supervision, e.g. a sole trader
  - There is a residential component.

#### 9. Learners with disabilities

- 9.1 Suffolk New College will so far as is reasonably practicable, ensure that learners are not discriminated against for the purposes of placement.
- 9.2 The definition of a disability is "a physical or mental impairment which has a substantial and long term adverse effect on an individual's ability to carry out normal day to day actions".
- 9.3 During the organisation of a placement for a learner with a disability the College, in agreement with the employer, will as far as is reasonably practicable, ensure the necessary procedures are in place for providing the learner with a safe and valuable placement experience.

### 10. Disclosure & Barring Service (DBS) checks for employers

10.1 Schools and colleges are not able to request that an employer obtains an enhanced Disclosure and Barring Service (DBS) check with children's barred list information for staff supervising young people aged 16 or 17 on work placement. Furthermore, schools and colleges are not able to request that an

employer obtains an enhanced DBS check for any staff member(s) who are responsible for supervising learners on placement.

## 11. Disclosure & Barring Service (DBS) checks for learners

11.1 Learners on placement within the healthcare and education sectors will need to have an enhanced Disclosure and Barring Service (DBS) check before starting their placement. The College has responsibility for managing this process from the point of application and / or enrolment where learners make application to study programmes requiring an enhanced DBS check.

## 12. The Safeguarding Team

- 12.1 We have a trained team of safeguarding professionals available between 8:30am and 5pm Monday to Thursday and 8:30am to 4:30pm on a Friday.
- 12.2 The team can be contacted on 01473 382738 or <a href="mailto:support@suffolk.ac.uk">support@suffolk.ac.uk</a>.
- 12.3 Where a concern or complaint is raised by a learner, the person receiving the information will refer it to the relevant Head of Department at the College for action to be taken in line with college policy.
- 12.4 If something happens outside of office hours the following services may be of help for employers or learners, but the Safeguarding Team will need to be informed of the concern and any action taken as soon as possible thereafter:

| Childline                                 | 0800 1111  |               |  |  |
|---|--|---------------|--|--|
| NSPCC                                     | 0808 800 5000  |               |  |  |
| Samaritans                                | 116 123 (24 hours)   |               |  |  |
| SHELTER                                   | 0808 800 4444 for urgent housing advice (homelessness) (Monday - Friday 8am to 8pm // weekends 9am to 5pm) |               |  |  |
| NHS 111                                   | 111 for urgent medical help or advice that is not life threatening   |               |  |  |
| Social Services (who you contact is       | Suffolk County Council   | 0808 800 4005 |  |  |
| dependent upon where the learner resides) | Essex County Council   | 0345 603 7627 |  |  |
| the learner resides)                      | Norfolk County Council   | 0344 800 8021 |  |  |
| Police                                    | 999 for emergencies<br>101 for non-urgent issues   |               |  |  |

### 13. Sources of information to help safeguard learners on placement

This Learner Placement Policy should be read in conjunction with college safeguarding policy information. Employers will receive from the College an overview of Safeguarding, as well as an overview of PREVENT.

Additional information can be found here:

- Suffolk Safeguarding Partnership: <u>www.suffolksp.org.uk/</u>
- Child Exploitation and Online Protection (CEOP): www.ceop.police.uk/Safety-Centre/