

Equality, Diversity and Inclusion Student Work Placement Policy

Introduction

Brunel University London is committed to providing a culture where all students at every stage of their undergraduate and postgraduate education can access and take full advantage of a work placement. This applies to any stage of their study and / or research at the University and to ensuring they do not encounter disadvantage or discrimination based on a social or cultural characteristic as recognised by the University's Equality, Diversity and Inclusion Strategy 2021 -24. For full details, see <https://students.brunel.ac.uk/documents/Policies/equality-diversity-and-inclusion-strategy-social-justice-for-all-2021-2024.pdf>. In addition, the University is committed to prioritising our students' mental health and wellbeing through our Mental Health and Wellbeing Strategy and expects this to be extended to their work placements. A complete version of the strategy can be found at <https://staff.brunel.ac.uk/directorates/hr/your-wellbeing/mental-health-and-wellbeing>.

Scope

This document applies to all types of placements undertaken as part of a student's programme of study at Brunel University London including professional placements, sandwich placements and internships. It aims to ensure that:

- A current student will not be treated less favourably than any other student at any stage of securing and completing their work placement.
- Appropriate guidance is available to help students navigate the work placement process including the application stage, interview, recruitment and the successful completion of the work placement.
- Clear expectations and responsibilities are communicated on what behaviours and practices are required both of the students and placement providers.

The policy also aims to provide advice and support to Students, Academic Departments, the Professional Development Centre and Placement Providers on how best to ensure equality, diversity and inclusion is placed at the heart of work placement opportunities and to support students throughout their student placements to ensure they can reach their full potential and have the best work placement experience.

Terminology

A work placement is a broad term which is used to describe an opportunity for students to develop their knowledge, skills and experience in a real-life work place setting. They may be embedded into and assessed through a modular or assessment block, such as for a short or professional placement, or they be a more significant undertaking such as a sandwich placement or internship, where a student's final award is tied to completion of the activity. Regardless of whether the placement is at block or programme level; or if it is formally organised by the

university or by students themselves, this policy framework will provide advice and guidance for all work placements.

Brunel Commitment

Brunel University London commits to:

- Ensuring that the University will take all reasonable steps to meet its statutory obligations to ensure all students are treated fairly and equally in their application to and completion of their work placements, and to eliminate and prevent any discrimination, bullying or harassment.
- Not placing any student with a protected characteristic in a placement which will put such a student at an unlawful disadvantage.
- Ensuring that no student will be denied access to or the opportunity to complete a work placement on the grounds of different social and cultural characteristics including ethnicity, sex, age, disability, religion, gender identity, sexuality and caring responsibilities.
- Providing information and advice to all students about the different types of placements opportunities and how to prepare adequately through the application and recruitment process / placement preparation process.
- Ensuring that recruitment practices and materials are inclusive and fair for all students so that they are able to reach their full potential and have a positive work placement experience.

Legal Context

Students on work placements are generally regarded as employees of the Placement Providers for the duration of their placement under the Equality Act 2010. This means that they will have the same rights and obligations as the Placement Providers' employees and the work Placement Providers have a duty as employers under the Equality Act 2010 towards students on placements and should ensure that placement students are treated fairly and equally and given the same support as other employees of the organisation. It should be noted that there are a few exceptions in health and social care where the students are still regarded as students.

Protection from Bullying and Harassment

The University is committed to working hard to ensure that students are not placed with Placement Providers where it is reasonably believed that harassment, bullying and / or discrimination is likely to occur. Although the University cannot anticipate particular incidents of bullying, harassment and / or discrimination, it has a statutory duty and duty of care to respond efficiently and properly to any complaint made by a student that they are experiencing harassment, bullying and / or discrimination and this applies both at the university and on their placement. In such instances, the student's Placement Tutor or an appropriate person identified by the relevant Head of Department / Division will support such a student in this matter in conjunction with the Student Support and Welfare Team and, where necessary, may liaise with the

Placement Provider to ensure that the situation is resolved promptly in accordance with the Placement Provider's Bullying and Harassment Policy.

In the event that the issue cannot be satisfactorily resolved, the relevant Head of Department or their representative in collaboration with the relevant Placement Adviser may terminate the placement and choose not to work with the Placement Provider in the future. Advice or additional support on this matter may be sought from the Student Equality and Diversity Manager.

The University's Responsibilities towards Work Placements

Brunel University London has a contractual relationship with its students and so may require that placements are undertaken as part of a student's study. Other students have the option to choose a sandwich year placement. However the University has a duty of care to each and every student throughout their placement.

Implementation of the Student Equality Work Placement Policy will be the responsibility of the relevant Head or Placement Coordinator of the respective Department / Division, and / or the Professional Development Centre depending on local arrangements. These should be agreed formally by the department and communicated clearly to students. They will act as the gatekeeper of the policy and should ensure that all staff involved with the placement process, are made aware of and follow this policy framework.

Heads of Department may delegate their responsibility under this policy to a member of staff such as a Placement Coordinator but where such responsibility is delegated, all staff within the department should be formally made aware of the identity of the individual responsible for the policy. The nominated person will then act as the gatekeeper for the policy and should ensure their familiarity and full understanding of its content and in particular their responsibilities under the law. In addition, the individual should ensure that students undertaking a placement as part of their programmes of study and the organisations providing such placements are aware of this policy, its content and their legal responsibilities under the law.

The University encourages all placements where possible to be paid in recognition of students' time and efforts. However in certain circumstances the University recognises that there are some courses where the placement is a mandatory part of the professional qualification and as such the students' courses fee will include a placement fee and the students themselves will not be paid. In addition, there might be other opportunities where students choose to undertake an unpaid placement but this should be done in an informed and transparent way and which is accepted by the University. The department, division or Professional Development Centre must also inform the student of the impact of undertaking an unpaid placement prior to their acceptance and will only approve the placement if this is acceptable to the student. It should be noted that in these cases, the students will be eligible to apply for an Unpaid Placement Bursary. For further details see, [Unpaid Placement Bursary Terms and Conditions \(courses commencing 2021/22\) \(brunel.ac.uk\)](https://www.brunel.ac.uk/unpaid-placement-bursary-terms-conditions).

The University will need to verify that a placement is appropriate for a student placement and the Provider meets the health and safety requirements and its duty under the equality legislation including conducting a risk assessment and completing the placement approval process.

In order to prepare students for their placement and as part of the placement induction process, the University will provide students with an appropriate 'Equality At Work' briefing, online module and / or training. Such training and / or briefing should contain equality, diversity and inclusion issues in the work environment which will be delivered either by the Professional Development Centre and / or the respective department.

Each student will be allocated a placement tutor who will visit and / or make contact with the student during the work placement period and monitor their progress on a regular basis, providing support with any issues. Depending on the nature of the placement, there may be additional requirements for successful completion of the placement such as observations, assessments and professional suitability which will be arranged locally and communicated clearly to students from the outset.

Supporting a student through their Work Placement

There are a number of different arrangements at Brunel to support a student through their work placement depending on the type of placement. Students should seek guidance from their department on whether the department will lead on helping them secure a placement and / or whether they should be seeking help and support from the Professional Development Centre or seeking a placement themselves.

Support available for students at the University varies according to the type of placement (the individual department will provide further guidance on this). It may include but is not limited to:

- Access to vacancies promoted by the Professional Development Centre or locally at departmental level
- Advice with developing their applications and preparations for interviews
- Support with preparing registration and approval forms
- Provision of pre-placement resources such as placement handbook, ED&I training
- Support throughout placement as and when required.

Expectations of Students on Work Placements

In most cases students on placements will be seen as employees of Placement Providers for the duration of their placement. However, there are a few professional courses where the students will continue to be regarded as students and this will be clarified at local level.

It is important that students understand that when on placement, they are a representative of the University and must not bring the University into disrepute. Whilst on placement, students are answerable both to the University and their Placement Provider. They must attend or undertake all pre-placement and on-placement training and / or briefings required by the University and their Placement

Providers. In addition some of the professional courses will be subject to the University's Professional Suitability Regulations, see [Senate Regulations | Brunel University London](#).

Students must report any issues of bullying, harassment and discrimination that occur on placement. Ideally students should report issues to the Placement Provider and to their University Placement Tutor who will provide additional support. But it is recognised that in some cases, students might find it difficult to report to the Placement Provider. If they need emotional support, they are still able to access the University's Student Support and Welfare Services – they can phone 01895 267045 or email studentsupport@brunel.ac.uk.

When on placement, the University expects students to demonstrate Brunel's values and behaviours of respect for equality, diversity and inclusion by adopting the policies and practices of their Placement Providers such as data protection, cyber security etc and to abide by the requirements of the Equality Act 2010 with regard to bullying, harassment, and / or discrimination.

Students must be made aware that any reported allegation of bullying, harassment and discrimination by a student during placement may be investigated by the University, as well as the Placement Provider, and may lead to disciplinary or suitability procedures being invoked by the University.

Students who have particular requirements

If students have particular needs, such as a disability, which will require a reasonable adjustment, are pregnant, have caring responsibilities or another equality issue, they should inform their department, division or the Professional Development Centre as appropriate as soon as they can so appropriate arrangements can be made.

Where placements are a formal requirement or standard component of the programme the University will consider ways of ensuring that the relevant specified learning opportunities are available to disabled students and those with other relevant protected characteristics. These may include the following:

- Seeking placements in accessible contexts and providing specialist guidance on placement opportunities
- Assist with the provision of alternative experiences where comparable opportunities are available which satisfy the relevant learning outcomes
- Providing support before, during and after placements that takes account of the needs of such a student. Where a placement is an optional element of the programme the University will consider making similar arrangements to support equal access for disabled students and for those students who may require additional adjustments under the Equality Act 2010.

For further information on providing support to disabled students, see Appendix A.

The Placement Provider's Responsibilities towards a Student on Placement

Work Placement Providers have a duty as employers under the Equality Act 2010 towards students on placements, irrespective of the student's paid or unpaid status, and should ensure that placement students are given the same support as other employees of the organisation. In addition, they must display ethical, respectful and inclusive values and behaviour applying appropriate principles.

As part of the placement induction, Placement Providers should provide the appropriate training and / or briefing on the organisation's policies and procedures relating to equality and diversity. Such training and / or briefing should include information on equality, diversity and inclusion issues in the work environment.

In order to facilitate and administer placements, a student's personal data may need to be disclosed by the Placement Provider to a third party. Placement Providers should ensure that the Data Protection Act and General Data Protection Regulation requirements are satisfied. Students must be informed of the fact that a disclosure will take place and explicit consent to disclose must be given by such students (particularly in relation to sensitive personal data relating to matters such as health, disability, racial/ethnic origin, gender identity or criminal records).

Any unacceptable behaviour directed towards a student whilst on placement should be dealt with by the Placement Provider, in line with its policies. Therefore, if a student reports an incident of bullying, harassment and / or discrimination to the Placement Provider, the Placement Provider must investigate the allegation in accordance with its harassment and discrimination policies.

Any unacceptable behaviour by a student during placement must be reported to the University. This does not remove the Placement Provider's right to use its policies to deal with any unacceptable behaviour by a student.

Where a student on placement declares to the Placement Provider a condition which requires additional support in the workplace, such as disability or a need for flexible working, the Placement Provider will arrange such necessary support in line with the requirements of the Equality Act 2010. In such an instance, and with the student's permission, additional support and advice may be sought from the University.

As part of the placement approval process, Placement Providers must complete and return the Health and Safety checklist to the University at the start of any placement. The University will not be able to approve a placement or allow a student to continue their placement if the Health and Safety checklist is not completed and returned by the Placement Provider.

Confidentiality

Confidentiality issues may arise for the University in situations where the University is aware of information about a particular student or can reasonably be expected to be aware of information about a particular student, which might be relevant to risk on the placement.

This is an extremely complex area and would need to be considered on an individual basis, with variables including the precise circumstances of the placement and the way in which the confidential information regarding the student has been received by the University.

Confidentiality and disclosure issues are particularly relevant for students with disabilities and transgender / non-binary students but not limited to such students. The use and transfer of information about students is restricted by the DPA and GDPR. The University should seek a student's permission before passing on any information necessary for making reasonable adjustments or any other arrangements which may include flexible working arrangements for such a student.

Students should be informed of how the information they disclose will be used and the University must ensure appropriate procedures are in place to keep personal information confidential.

A student on placement may encounter confidential information about the Placement Provider, its employees, its customers and/or products during the course of the placement. It is a student's responsibility to ensure that confidentiality is maintained at all times, during and after such placements.

Complaints

If a student feels that the University has failed to comply with this policy, they may raise their concerns using the Students' Complaints Procedure. For more information see - [Complaints \(brunel.ac.uk\)](https://www.brunel.ac.uk/complaints).

Guidance and additional support on any matter relating to the policy may be sought from the following:

- Student Equality, Diversity and Inclusion Issues from the Student Equality and Diversity Manager, see [Student Equality, Diversity and Inclusion \(brunel.ac.uk\)](https://www.brunel.ac.uk/student-equality-diversity-and-inclusion)
- Work placements from the Professional Development Centre on [Book an appointment \(brunel.ac.uk\)](https://www.brunel.ac.uk/book-an-appointment)
- Students' individual departments
- Professional Suitability Issues and other disciplinary issues from OSCCA at [Student complaints, conduct and appeals \(brunel.ac.uk\)](https://www.brunel.ac.uk/student-complaints-conduct-and-appeals)
- Student Support and Welfare issues from studentsupport@brunel.ac.uk,

Appendix A: Supporting Disabled Students

A disabled student should inform the Placement Provider as soon as they can if they require a reasonable adjustment so appropriate arrangements can be made. It is advisable that students discuss such issues with their department and / or the Professional Development Centre before they go on placement and where appropriate the University, together with the student, will discuss relevant adjustments with the placement provider.

Where placements are a formal requirement or standard component of the programme the University will consider ways of ensuring that the relevant specified learning opportunities are available to disabled students. These may include the following:

- Seeking placements in accessible contexts and providing specialist guidance on placement opportunities
- Assist with the provision of alternative experiences where comparable opportunities are available which satisfy the relevant learning outcomes
- Providing support before, during and after placements that takes account of the needs of the disabled student. Where a placement is an optional element of the programme the University will consider making similar arrangements to support equal access for disabled students and for those students who may require additional adjustments under the Equality Act 2010.

Where the University is aware of a student's disability, such a student will be given advice on the different funding streams available to support their learning while on placement, for example, Access to Work and the Disabled Students Allowance.

Confidentiality and disclosure issues are particularly relevant for disabled students. The use and transfer of information about students is restricted by the Data Protection Act 1998 and General Data Protection Regulation 2018. The University should seek a student's permission before passing on any information necessary for making reasonable adjustments or any other arrangements which may include flexible working arrangements for such a student.

Students should be informed of how the information they disclose will be used and the University must ensure appropriate procedures are in place to keep personal information confidential.

Should a disabled student request complete confidentiality under the DDA Part IV, then even for the purposes of making reasonable adjustments, the information should not be passed on. This may result in a lesser adjustment, or no adjustment being made.

The DDA Part IV does not, however, override Health and Safety legislation, or remove the duty which the University has to protect students, employees and Placement Providers in relation to student placements. There may be exceptional circumstances in which the University comes under a duty to disclose information to third parties, such as Placement Providers, even against a student's expressed desire for confidentiality. In such an instance, the student should be informed that for

Health and Safety reasons, confidentiality would be breached. Relevant members of staff should consult with the University's Information Access Officer before disclosing personal information to a third party.