



Student Equity Work Placement Policy

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Student Equity Work Placement Policy

Introduction

Brunel University of London is committed to providing a culture where all students and doctoral researchers 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 Equity Strategy 2025-29. For full details, see <https://students.brunel.ac.uk/documents/Policies/equity-strategy-2025-2029.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 [DPS-731 Mental Health and Wellbeing Strategy A4 8pp AH V1 \(5\)](#).

Scope

This document applies to all types of placements undertaken as part of an undergraduate or postgraduate programme of study/research at Brunel University of London including professional placements, sandwich placements, volunteering, entrepreneurial opportunities 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 preparation and 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 of the students, the University and placement providers.

The policy also aims to provide advice and support to students, academic departments, Professional Work Experience Team and Placement Providers on how best to ensure equity is placed at the heart of work placement opportunities and to support students and doctoral researchers throughout their placements to ensure they can thrive 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 workplace setting. They may be embedded into and assessed through a modular or assessment block, such as for a short or professional placement, or they may 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 of London commits to:

- Ensuring that the University will take all reasonable steps to meet its statutory and regulatory obligations to ensure all students are treated fairly and equitably 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
- Working with Placement Providers to meet their equity responsibilities as set out in the Employers Placement Guidance to provide equal opportunities and prevent individuals from being denied access to or the opportunity to complete a work placement on the grounds of the different social and cultural characteristics such as age, caring responsibilities, disability, ethnicity, gender reassignment, religion and beliefs, social economic status, sex and sexuality
- 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 and placement preparation process
- Ensuring that recruitment practices and materials are inclusive and fair for all students so that they have the opportunity to reach their full potential and have a positive work placement experience
- Ensuring that, in compliance with the University's Code of Practice on Freedom of Speech and Academic Freedom and the University's Free Speech Statement, nothing in this policy shall be used as justification for restricting lawful freedom of expression or academic freedom
- Appropriate support will be provided to those impacted by any complaint made under this policy
- The whole University community will be made aware of this policy and their responsibilities to which they are expected to comply
- Ensuring all members of the University will be made aware of the Single Comprehensive Source of Information: [Harassment and sexual misconduct support | Brunel University of London](#) relating to incidents of harassment and sexual misconduct to comply with the Office for Students' Condition of Registration E6 - ([Condition E6: Harassment and sexual misconduct - Office for Students](#)).

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. The Work Placement and Practice Learning Providers

likewise have a duty as employers under the equality legislation towards students on placements and should ensure that placement students are treated fairly and equitably 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 dedicated to ensuring a safe environment for everyone in our community. We do not tolerate any form of harassment, bullying or sexual misconduct and take proactive steps to prevent and address these issues promptly in accordance with our legal and regulatory duties as set out in [Condition E6: Harassment and sexual misconduct - Office for Students](#). The University's duties extend beyond the physical campus to include any context or setting related to the university's activities including placement settings and activities. Our goal is therefore to ensure that all Brunel University of London students, regardless of their location, have access to a safe and supportive environment free from harassment and sexual misconduct.

Key information about the University's approach to preventing and supporting students affected by harassment, bullying and sexual misconduct, including when on placement, can be found in the University's Bullying and Harassment Policy, [Student Bullying and Harassment Policy](#). The Single Comprehensive Source of Information (SCSI) <https://www.brunel.ac.uk/life/supporting-you/harassment-and-sexual-misconduct-support> also outlines all relevant policies and procedures, how to report incidents of harassment, bullying and sexual misconduct and sources of support, as well as the definitions of 'harassment' and 'sexual misconduct' used by the University. 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 Brunel cannot anticipate particular incidents of bullying, harassment and / or discrimination, it is committed to reducing and preventing incidents and supporting students when such incidents occur.

The University also must 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. Where a student experiences harassment, bullying or sexual misconduct whilst on placement, the student's Placement Tutor or an appropriate person identified by the relevant Head of Department will support such a student in this matter in conjunction with the Student Wellbeing and Inclusive Support 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.

If the issue cannot be satisfactorily resolved, the relevant Head of Department or their representative in collaboration with the relevant Placement & Internship

Specialist may terminate the placement and choose not to work with the Placement Provider in the future. The Equity Lead (Students) can also provide advice on this matter.

Students are strongly encouraged to report any issues of bullying, harassment, sexual misconduct or 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 as they navigate the Placement Journey, they are always able to access the University's Student Wellbeing and Inclusive Support Team – they can:

- email studentsupport@brunel.ac.uk
- contact the Student Hub
- Visit the Michael Sterling Building, open Monday to Friday, 9.00 am – 5.00 pm
- Email: studenthub@brunel.ac.uk
- Call us: +44 (0)1895 268268

Further information about reporting incidents of harassment, bullying and sexual misconduct can be found in the University's SCSi: [Harassment and sexual misconduct support | Brunel University of London.](#)

The University's Responsibilities towards Work Placements

Brunel University of 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 every student throughout their placement.

Implementation of the Student Equity Work Placement Policy will be the responsibility of the relevant Head or Placement Coordinator of the respective Department and/or the Professional Work Experience Team 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 work 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 academic department or Professional Work Experience Team 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.

The University will need to verify that a placement is appropriate for a student's programme/research and the Provider meets the health and safety requirements and its equality duties under the Equality Act 2010 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 'Equity At Work' online module. Such training should contain information about equity issues in the work environment and will be delivered either by the Equity Lead (Students), Professional Work Experience Team 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. The relevant academic department Head or Placement Coordinator and/or the Professional Work Experience Team depending on local arrangements is responsible for monitoring satisfactory progress and completion of any additional criteria.

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 and academic departments will provide guidance accordingly. Students should seek clarification 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 Work Experience Team 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 Work Experience Team 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 and equity 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 the 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 themselves 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, students on some of the professional courses will be subject to the University's [Senate Regulation 14 - Fitness to Practise \(October 2024\)](#).

When on placement, the University expects students to demonstrate Brunel's values and behaviours and comply with the [Student Code of Conduct](#). In addition, they also are required to adhere to the policies and practices of their Placement Providers such as data protection, harassment in the workplace, cyber security etc.

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 misconduct procedures being invoked under the Non-academic Misconduct Procedure pursuant to [Senate Regulation 6](#) or fitness to practice procedures under [Senate Regulation 14](#).

Supporting Students who have Particular Requirements

If students have particular needs, such as a disability or are neurodivergent, which will require a reasonable adjustment, are pregnant or have caring responsibilities and need support, they should inform their department or the Professional Work Experience Team as appropriate as soon as they can so necessary arrangements can be made and put in place before taking up their placement.

Where placements are a formal requirement or standard component of the programme, the University will do their utmost to ensure that the relevant specified learning opportunities are available to disabled students and those with other equity issues. These may include the following:

- Seeking placements in accessible and inclusive contexts and providing specialist guidance on placement opportunities

- Assist with the provision of alternative experiences where comparable opportunities are available which satisfy the relevant competency standards and 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 equitable access for disabled and neurodivergent students and for those students who may require additional adjustments under the Equality Act 2010 or per the Access and Participation Plan.

Students with Support Profiles or other Support Plans are encouraged to seek support from the Wellbeing and Inclusive Support Team as they transition into work placement settings. This may include direct support and guidance to the student regarding disclosure, assessing and recommending reasonable adjustments and requesting appropriate support from their new employer, alongside collaborative engagement between the student, their Head of Department or Placement Coordinator, the Professional Work Experience Team and employer to support a successful and appropriate transition.

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. They must also be aware of the University's responsibilities under the Office for Student's Condition of Registration E6 referred to in the University's Single Comprehensive Source of Information (SCSI) [Harassment and sexual misconduct support | Brunel University of London](#) as well as how students can report incidents of harassment, bullying and sexual misconduct occurring on placement and sources of support. 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 on the organisation's policies and procedures relating to equity and sexual violence and harassment. Such training and / or briefing should include information on equity issues in the work environment.

In order to facilitate and administer placements, a student's personal data may sometimes need to be disclosed by the Placement Provider to a third party. Placement Providers should ensure that the Data Protection Act (DPA) and General Data Protection Regulation (GDPR) 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 which has occurred whilst on placement, the Placement Provider should 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 should 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.

Privacy and Confidentiality

The use and transfer of information about students is restricted by the Data Protection Act 1998 and General Data Protection Regulation 2018. The University takes its data protection and privacy responsibilities very seriously. For further information see <https://www.brunel.ac.uk/about-this-website/privacy-and-copyright-statement>.

Confidentiality and disclosure issues can be particularly relevant for students with disabilities and transgender / non-binary students but not limited to such students during the Work Placement Process. 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.

Sometimes 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 can be 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. Advice should be sought from the University's Head of Privacy.

A student on placement is likely to come into contact with confidential information about the Placement Provider, its employees, its customers and/or products during the course of the placement. It is common practice for the Placement Provider to ask the student to sign a confidentiality agreement or non-disclosure agreement which they are expected to abide by. 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 - [Student Complaints](#).

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

- Student Equity from the Student Equity Lead (Students), please email studentequity@brunel.ac.uk
- Work placements from Professional Work Experience Team by emailing studentplacement-enquiry@brunel.ac.uk for sandwich placements and academic-placements@brunel.ac.uk for compulsory placements as part of the course
- Students' individual academic departments
- Fitness to Practice Issues and other disciplinary issues from OSCCA at [Student complaints, conduct and appeals \(brunel.ac.uk\)](#)
- Student Wellbeing, Inclusion and Support issues from studentsupport@brunel.ac.uk.

Freedom of Speech at Brunel

Brunel University of London is under legal and regulatory duties to take reasonably practicable steps to secure free speech within the law for its students, staff and members and for visiting speakers. It also requires the university to maintain a free speech code of practice and to promote the importance of freedom of speech within the law and academic freedom in the provision of higher education.

The University has published a statement relating to freedom of speech and academic freedom: [Freedom of speech statement | Brunel University of London](#).

This makes clear that the University will support freedom of speech that may be controversial or unpopular or that may shock, offend or disturb, but it will not support unlawful speech, which for example, may incite violence, incite hatred on grounds of

a protected characteristic, amount to a terrorism related offence or cause harassment, alarm or distress contrary to the law. Free 'speech' includes written materials and other forms of expression. It is not limited to the spoken word. All University staff members, students, visiting speakers and people invited or being lawfully present on university premises will at all times assist the University in upholding the free speech principles of the Freedom of Speech statement within the University.

The Freedom of Speech Statement should be read in conjunction with the University's Code of Practice on Free Speech and Academic Freedom. The Code of Practice governs the process for ensuring this statement represents practice at the University and for managing events involving external speakers. The presumption is that all speakers should not be denied access to University premises on grounds of their opinions and beliefs and that all such events can proceed unless a particular risk is identified and cannot be mitigated.

In implementing the Student Equity Work Placement Policy and in cases of uncertainty, the up-to-date position of the university is set out in the University's [Code of Practice on Freedom of Speech and Academic Freedom](#) which refers to the [Freedom of Speech Statement](#).

Appendix A – Supporting Disabled and Neurodivergent Students

Disabled and/or neurodivergent students are strongly encouraged to inform the Placement Provider as soon as they can if they require any reasonable adjustment so appropriate arrangements can be made in advance. It is advisable that students discuss such issues with their department and / or the Professional Work Experience Team at the planning stage so that appropriate arrangements can be made and reasonable adjustments put in place.

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 and neurodivergent 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 and neurodivergent student. Where a placement is an optional element of the programme the University will consider making similar arrangements to support equitable access for disabled and neurodivergent 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 or neurodivergence, they can seek advice on the different funding streams available to support their learning while on placement, for example, Access to Work - [About Access to work](#) and the Disabled Students Allowance - [Help if you're a student with a learning difficulty, health problem or disability: Disabled Students' Allowance - GOV.UK](#)

The Wellbeing and Inclusive Support Team can support disabled and neurodivergent students with support profiles as they transition into work placement settings. This may include direct support and guidance to the student regarding disclosure, recommending reasonable adjustments required for the work placement and requesting appropriate support from their new employer, alongside collaborative engagement between the student, their Head of Department or Placement Coordinator, the Professional Work Experience Team and employer to support a successful and appropriate transition.

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 or neurodivergent student request complete confidentiality under the Data Protection Act, then even for the purposes of making reasonable adjustments, the information should not be passed on. It should be noted that this may result in a lesser adjustment, or no adjustment being made. But this does not 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 Head of Privacy before disclosing personal information to a third party.