

Equality Policy

Student work placement guidelines

Aim

The purpose of this document is to outline the guidelines and expectations for the proper operation of the Equality Policy: Work Placement.

Responsibilities

The proper operation of the Equality Policy: Work Placement is the responsibility of the relevant Head of Department, who will act as the gatekeeper of the policy. Heads of Department should ensure that all staff, particularly those involved with the placement process, are aware of and follow this policy.

Heads of Department may delegate their responsibility under this policy to a member of staff. Where such responsibility is delegated, all staff within the department should be informed 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 this policy, its content and in particular, their responsibility 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 responsibility under the law. For sandwich placement providers, PDC will be responsible for ensuring organisations are aware of this policy.

Guidance and additional support on any matter relating to the policy may be sought from the Student Equality and Diversity Manager.

Student work placement policy

This policy has been informed by the following external reference points;

- Equality Act 2010
- UK Quality Code for Higher Education, Part B4
- Providing Work Placements for Disabled Students: A good practice guide for further and higher education institutions, Department for Education and Skills

This document applies to all types of placements undertaken as part of a student's programme of study at Brunel University London. It should be read in conjunction with the University's 'Equality and Diversity Statement', the 'Anti-Harassment Statement' and the University's and individual College/Department's policies relating to student placements including, but not be limited to, the 'Health and Safety Policy: Student Work Placement within the UK', the 'Guidance for Placement Providers', 'Work Placement Code of Practice' and the 'Placement Learning Policy: Degrees with Placement Year' as well as the relevant parts of Senate Regulation 2 (SR2. 42-45 (2014)).

This policy aims to set out clear roles and responsibilities for Brunel University London, Brunel students and the placement provider. It outlines equality related legal implications for all the parties, which may arise from placement activities. Equality legislation covers issues relating to disability including ill- health, religion and / or belief, gender reassignment, sex, race, pregnancy and maternity, age and sexual orientation.

The relevant Head of Department shall be responsible for the proper operation of this policy and should ensure that all staff, particularly those involved with the placement process, are aware of and follow this policy. Guidance or additional support on any matter relating to this policy may be sought from the Student Equality and Diversity Manager.

1. Parties Concerned

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- Brunel University London has a contractual relationship with its students and as such, programmes provided by the University may require that placements are undertaken as part of a student's study. In this regard, the University has a duty of care to each student on placement.
- Should the University fail in its duty of care, it could potentially be exposed to the risk of legal challenge under the Equality Act 2010.

Placement Providers

- 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.

Students

- Students on placements will be seen as employees of placement providers for the duration of their placement. Such students will have the same rights and obligations as the placement providers' employees under the Equality Act 2010, irrespective of the student's paid or unpaid status.
- 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 through actions which may contravene the Equality Act 2010.
- Whilst on placement, students are answerable both to the University and their placement provider.

2. Roles and Responsibilities

A. Induction

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- 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 and / or training. Such training and / or briefing should contain equality related issues in the work environment. It should also include, but not be limited to, issues relating to race, disability, medical condition, gender, religion and / or belief, age and sexual orientation.

Placement Providers

- Placement providers as part of the placement induction 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 contain equality related issues in the work environment. It should also include, but not be limited to, issues relating to race, disability, medical condition, gender, religion and / or belief, age and sexual orientation.

Students

- Students must attend or undertake all pre-placement and on-placement training and / or briefings required by the University and their placement providers.

B. Harassment, Bullying and Discrimination Brunel University London

- Equality legislation obliges the University to take care to ensure that students sent on placement are not exposed to bullying, harassment and / or discrimination. Although the University cannot be expected to anticipate particular incidences of bullying, harassment and / or discrimination, it has a statutory duty to respond efficiently and properly to any complaint made by a student that he/she is suffering harassment, bullying and /or discrimination on their placement. In such instances, the student's Placement Tutor or an appropriate person identified by the relevant Head of Department will support such a student in this matter and, where necessary, may liaise with the placement provider to ensure that the situation is resolved promptly in accordance with such placement provider's policy.
- The University should also take care not to place students with placement providers where it is reasonably believed that harassment, bullying and /or discrimination is likely to occur.
- Investigating allegations of bullying, harassment and / or discrimination during placement is primarily the responsibility of the placement provider. However, in instances where such responsibility is not fully undertaken by the placement provider, the University may seek to negotiate a satisfactory outcome.
- In the event that the issue cannot be satisfactorily resolved, the relevant Head of Department or their representative may terminate the placement. Advice or additional support on this matter may be sought from the Student Equality and Diversity Manager.
- Any reported allegations of bullying, harassment and discrimination on the part of the student whilst on placement may be investigated and may lead to disciplinary or suitability processes being invoked by the University.

Placement Providers

- Any unacceptable behaviour directed towards a student whilst on placement should be dealt with by the placement provider, in line with its policies. Therefore in the event that 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 anti- harassment and anti-discrimination policy.
- 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.

Students

- Students must report any issues of bullying, harassment and discrimination to the placement provider in the first instance. The student may also inform the University, by reporting the issue to his or her Placement Tutor. In such instances the University may be able to provide additional support. These may include but not be limited to, Conflict Coaching and Counselling.
- When on placement, the University expects students to value diversity and promote equality by adopting the policies and practices of their placement providers and to abide by the requirement 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 and may lead to disciplinary or suitability procedures being invoked by the University.

C. Equality Matters Brunel University London

- In line with the Equality Act 2010, the University will endeavour not to place any student with a protected characteristic in a placement which will put such a student at an unlawful disadvantage when compared to others without a protected characteristic.
- The University will ensure that, wherever possible, disabled students will have equal access to placement opportunities.
- 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:
 - i. Seeking placements in accessible contexts and providing specialist guidance on placement opportunities;
 - ii. Assist with the provision of alternative experiences where comparable opportunities are available which satisfy the relevant learning outcomes;
 - iii. Providing support before, during and after placements that takes account of the needs of such a student. For example, such a need may arise from the fact that the student has a disability or that the student is pregnant.
- 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 adjustment under the Equality Act 2010.
- Hence, where necessary the University will work with placement providers to make reasonable adjustment for disabled students and for those students who may require additional adjustment 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.
- As part of the placement approval process, the University will require placement providers to complete and return the Health and Safety checklist. The University will not be able to approve a placement or allow a student to commence their placement if the Health and Safety checklist is not completed and returned by the placement provider.

Placement Providers

- In the event that 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 such 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 before the start of any placement. The University will not be able to approve a placement or allow a student to commence their placement if the Health and Safety checklist is not completed and returned by the placement provider.

Students

- Students should inform their placement providers without undue delay of any issues relating to such student's disability including ill-health, as well as issues relating to pregnancy, childcare matters or any equality matters which may arise or pre-exist.
- It is the student's responsibility to inform their placement provider of any issues relating to disability including ill-health, as well as issues relating to pregnancy, childcare matters or any equality matters which may arise.
- It is advisable that students discuss such issues with the University before they go on placement and where appropriate the University, together with the student, will discuss relevant adjustments with the placement provider.

D. Confidentiality

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- 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 but not limited to such students. The use and transfer of information about students is restricted by the Data Protection Act 1998. 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 thus 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.

Placement Providers

- 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 DPA requirements are satisfied. Students must be informed of the fact that a disclosure will take place and explicit consent to disclosure must be given by such students (particularly in relation to sensitive personal data relating to matters such as health, disability, racial/ethnic origin or criminal records).

Students

- Disabled students, who request complete confidentiality under the DDA Part IV request, should be aware that it may result in a lesser adjustment, or no adjustment being made during their placements.
- It is also important for such students to note that the DDA Part IV 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 placement. Hence, students need to be aware that 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 the student's expressed desire for confidentiality.
- 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 such a student's responsibility to ensure that confidentiality is maintained at all times during and after such placements.