

Practice Based Education Policy

APPLICABLE TO COURSES DELIVERED BY:

- UCO School of Osteopathy

1 Introduction

- 1.1 The University is committed to developing student employability and working with employers to produce graduates who have the knowledge, professional standards, competences and proficiencies for successful employment. Practice-based learning as an integral component of a program of study contributes to students' developing professional and employability skills.
- 1.2 The following processes describe the UCO School of Osteopathy's requirements for the approval and management of practice-based educators that provide placements for students studying on programs of study for which practice based learning is integral.
- 1.3 These processes follow good practice to ensure that the UCO School of Osteopathy meets its responsibilities regarding the management and quality of the student learning experience in addition to their safety and wellbeing whilst on practice-based placements.
- 1.4 Practice-based learning also includes within its scope work-based learning, placements or any education provided by another institution or organisation responsible for delivering teaching and learning within a work-based setting, who within this context are described as practice-based educators.

2 Principles

- 2.1 The principles upon which practice-based educators are chosen should include the following:
 - a) The learning associated with a practice-based educator must be designed to take account of relevant external reference points (e.g. the Quality Assurance Agency's UK Quality Code, any Professional, Statutory and Regulatory Body expectations and university policies).
 - b) Courses must have in place arrangements for the quality assurance of practice-based education placement opportunities, including management of risks relating to health and safety, quality and other risks associated with the specific proposals for a given course.
 - c) Students must be registered as a student of the University (or of an approved collaborative partner organisation) for the duration of the practice-based placement.
 - d) Learning outcomes that contribute to the overall aims and learning outcomes of the course and/or unit(s) must be appropriate for the practice-based learning experience and should be clearly defined within the course and/or unit information forms.
 - e) Practice-based learning opportunities must be of an appropriate length and quality to ensure that the identified learning outcomes can be achieved.
 - f) Any professional considerations and Professional, Statutory and Regulatory Body (PSRB) expectations must be taken into consideration.
 - g) Information provided to prospective and current students (e.g. Course and Unit Information Forms, Course Handbooks, Course Prospectus or Brochures and web-based course pages must clearly state the nature and duration of any practice-based learning and that this is integral to the course.
 - h) Documentation must be clear to all parties, including any reasonable adjustments to accommodate needs of disabled students.

- i) The arrangements for practice-based learning within courses must be approved through the normal course approval processes (Academic Quality Framework Section 4 – Course & Unit Approval & Modification). Approval must include consideration of draft guides/handbooks or equivalent for students and for practice-based educators and, where applicable, for practice-based supervisors/mentors.
- j) The responsibilities of students, academic staff and practice-based educators must be clearly defined and communicated to all parties concerned, and there must be evidence that all parties accept their responsibilities, i.e. through a Placement Agreement, Practice Education Handbooks (or equivalent).
- k) Any assessment of practice-based learning must form part of a coherent learning strategy for the course and be subject to the normal processes of assessment and moderation and the standards of student achievement overseen by appropriately qualified external examiners.
- l) Where practice-based educators are involved in monitoring student progress and/or assessment of student work, they must be trained appropriately, and a record kept of this.

3 Risk-Based Approach

- 3.1 In line with good practice, the University takes a risk-based approach to approve and manage the practice-based educators it works with to ensure academic standards and quality and the appropriateness of the placement regarding the health, safety and welfare of students and any associated liabilities.
- 3.2 The following risk management principles are used to achieve this:
- a) Having appropriate processes for the approval and review of prospective placements.
 - b) Placements accepting the UCO School of Osteopathy's health and safety expectations whilst students are on placement.
 - c) Clarity of understanding by each party of their roles and responsibilities.
 - d) Preparation of the student/s prior to their placement to enable them to be in a position to understand any risks and make informed judgements.
 - e) Having appropriate processes for enabling problems, including any health and safety issues, to be raised and resolved prior to, during, and at the conclusion of the placement.
 - f) Having contingency plans in case there are exceptional circumstances regarding the placement.
 - g) Providing appropriate training or briefings to UCO School of Osteopathy's staff and practice-based educators regarding the placement and any policies, regulations and arrangements that they must follow.
 - h) Having appropriate processes for the monitoring and evaluation of placements.
 - i) Assessing the needs of disabled students in order that reasonable adjustments can be made at placements.
 - j) Assessing risks associated with working with clients who may be vulnerable.
- 3.3 The planning, procedures, and information requirements associated with the practice-based education provider will vary according to the level of risk identified ('Low Risk', 'Medium Risk', and 'High Risk') with actions to address risks being dependent and proportional upon the issue, the country/region and the level of risk involved.
- 3.4 Where the provider does not initially meet the required standard, additional information from the provider will be required and reasonable control measures may need to be put in place (see guidance provided with the Practice-Based Educator Provider Risk Assessment Form (Appendix 1)).
- 3.5 Placements assessed as 'High Risk' by the Placement Coordinator upon completion of the Practice-Based Educator Provider Risk Assessment Form (Appendix 1) must be referred to the Vice-Chancellor (or their delegated nominee) for a decision as to whether the placement can proceed and what control measures are required.

4 Health & Safety

- 4.1 The University has a statutory duty of care to protect, so far as is reasonably practicable, the health, safety and welfare of its students during placement activities and must therefore take reasonable steps to ensure that all practice-based learning environments are compliant with statutory health and safety requirements.
- 4.2 Students undertaking practice-based placements are, in effect, acting as an employee of practice-based educator for the duration of the placement, and as such are owed an identical duty of care by the practice-based education provider.
- 4.3 Students are also responsible for taking reasonable care of their own health and safety and that of others who may be affected by their actions whilst on placements.
- 4.4 As part of the approval and review process of practice-based education providers a suitable and sufficient risk assessment must be undertaken, and appropriate control measures should be identified and adopted. The Risk Assessment Form for Practice-Based Education (Appendix 1) must be used to undertake an evaluation of risk and as a record of risk assessment for the practice-based education partner being proposed.
- 4.5 Practice-based education partners must confirm that they take proper account of health and safety considerations and must ensure that students who undertake a placement with them receive appropriate briefing on health and safety matters related to their organization by completing a Practice-Based Education Provider Health and Safety Questionnaire (Appendix 2) which must be received by the Placement Coordinator prior to the student commencing the placement.
- 4.6 All accidents / incidents involving students during their placement must be reported to the Placement Coordinator and the Placement Provider.
- 4.7 Although the University cannot accept responsibility for matters over which it has no control, in circumstances where matters of health and safety arise, the UCO School of Osteopathy shall undertake a prompt investigation and give due consideration to the implications for any other student(s) who may be engaged in the same or a similar placement.
- 4.8 The placement provider and students must be informed of who and how to contact the UCO School of Osteopathy, in case of an accident or emergency involving a student whilst on their placement.
- 4.9 Details of where and when students are on placements should be held centrally by the Placement Coordinator. Students' personal details are held centrally by Registry and students required to keep these up-to-date to enable contact with themselves and/or next of kin as necessary
- 4.10 In the case of an emergency involving a student on placement or major incident (for example, a natural disaster in the vicinity of the student placement), the University's process for dealing with emergencies and major incidents must be followed.

5 Insurance

- 5.1 Appropriate insurance should be considered as part of the risk assessment for proposed Practice-Based Education Providers. The following guidance is provided regarding insurance and liability.

a) Legal Liability

- 5.2 Normally, students shall be the legal liability of the practice-based education provider for the duration of their placement. Therefore, any injury, loss or damage caused or suffered by the student whilst they are under the supervision of the placement provider is the responsibility of the placement provider.

b) Public Liability

- 5.3 The University Public Liability insurance covers the University in the event of a claim arising out of our own negligence (where a claim could be brought by the student against the University) and covers the UCO School of Osteopathy and the student for any claim made as a result of a negligent act carried out by the student whilst they are on placement (where a claim could be brought by the placement provider against either the student or the University).

c) Employer's Liability

5.4 Practice-based education providers are normally asked to accept liability for the student for the duration of the placement as the student is directly under their control and supervision. Where this is agreed a copy of the Employer's Liability Certificate of Insurance is asked for, so that we are aware of the policy number, limit of liability, date of expiry and insurance company. Within the UK a reciprocal arrangement is in place within the Insurance sector and most Employer's Liability insurance policies accept the student as a 'temporary employee'.

d) Travel and Personal Accident Cover in relation to Overseas Travel

5.5 Appropriate travel and personal accident cover for students should be considered if the proposed Practice-Based Education Provider is based overseas, taking into consideration advice from the British Foreign Commonwealth Office.

e) Medical Malpractice / Clinical Negligence / Professional Indemnity Insurance

5.6 Students working within NHS hospitals in the UK should be covered for professional risks under the Clinical Negligence Scheme for Trusts. If the placement is in a GP's surgery, independent practice (such as a physiotherapy practice), private hospital, hospice or nursing home, the Placement Coordinator needs to ask the provider if their insurance covers the liability of the student for injuries to third parties, including clinical errors, or property damage arising from their duties within the organisation. If such cover is not provided, they should liaise with the UCO School of Osteopathy for further advice. It may be necessary for the student to be a member of a relevant professional body in order for Clinical Negligence cover to be in place.

f) Motor Insurance

5.7 Students wishing to use their private car whilst on placement for business purposes, other than driving to and from the placement, must check with their motor insurers to ensure that they have 'business use' on their policy, not just 'social, domestic and pleasure' use.

g) Criminal Activity

5.6 Any criminal acts committed by the student are not covered under any insurance arrangements.

7 Safeguarding and Disclosure and Barring Service (DBS)

7.1 The University has clear policies related to safeguarding, including processes for checking where DBS is required.

7.2 Placements which involve engagement in regular and unsupervised 'regulated activity' (as defined by the Protection of Freedoms Act 2012) with children or in certain adult settings may require students to undergo an enhanced DBS check and gain a satisfactory DBS before they start their placement.

7.3 For some PSRB courses an enhanced DBS will be required prior to the student commencing their course.

7.4 Where a satisfactory DBS is a prerequisite for a course or a placement that is a required element of the course), this must be clearly communicated to applicants in advance of entry to the course, and/or to students prior to undertaking units that include a mandatory placement, through published materials, including the course / unit information forms, prospectus / brochure and course webpages and any other relevant information and guidance.

7.5 DBS checks are normally arranged through the University and should be initiated in sufficient time to ensure that the student's course, placement can go ahead. Occasionally they may need to take place through a placement provider.

7.6 Students must be fully briefed about the University safeguarding and DBS policies and procedures prior to the commencement of their placement or work-based learning activity.

8 Lone Working

- 8.1 In circumstances where a situation of lone working may be required this should be identified in the Health and Safety Questionnaire (Appendix 2) and taken into consideration in the risk assessment and approval of the placement.
- 8.2 The placement provider is normally responsible for risk assessment if sending a student into a situation of lone working and may have procedures that apply.

9 Approving Practice-Based Education Providers & Placements

- 9.1 Every practice-based education provider and placement must be approved before the student commences the placement.
- 9.2 All practice-based education provider and placement must be approved by the Vice-Chancellor or their nominee (normally the Placement Coordinator), depending on the level of risk provider poses, before the student commences the placement.
- 9.3 It is the responsibility of the Placement Coordinator, in liaison with relevant staff, to complete the following documents to evaluate the suitability of a placement provider (the overall content of these documents should not be changed however they can be adapted to reflect local nomenclature relevant to particular programs or formatting of the document can be changed to suit local needs):
- a) Appendix 1: Risk Assessment Form for Practice-Based Education Providers
 - b) Appendix 2: Placement Provider Health and Safety Questionnaire
 - c) Appendix 3: Student Placement Conduct and Health and Safety Agreement
 - d) Appendix 4: Practice-Based Education Audit Record

a) USoO Risk Assessment Form for Practice-Based Education Providers (Appendix 1)

All practice-based education placements must be approved in line with the level of risk established through the UCO Risk Assessment Form for Practice-Based Education Providers (Appendix 1- AQF16-30a).

This should identify the level of risk the placement provider poses and once completed should assure the individual approving the placement that the placement will:

- a) Provide the opportunities and resources for the student to achieve the intended learning outcomes at the required standard and level as per the course / unit information form/s.
- b) Provide support for the student from a designated member of staff in the placement setting.
- c) Fulfil their responsibilities under health and safety legislation.
- d) Provide an experience that complies with the requirements of any relevant PSRBs, as appropriate.
- e) Make reasonable adjustments as identified through a needs assessment for students with disabilities.

If any residual risks are high, the placement provider must be approved by the Vice-Chancellor in their capacity as Academic Council Chair.

If the residual risk is low-medium, the placement provider is normally approved by the Placement Coordinator.

b) Placement Provider Health and Safety Questionnaire (Appendix 2)

The Placement Coordinator must be assured before the commencement of the placement that placement providers are willing and able to provide the student with a safe, legal (legislation in respect of the country where the placement provider is located) and appropriate working environment and that they are aware that it is their legal responsibility to provide this.

The Placement Provider Health and Safety Questionnaire (Appendix 2 - AQF16-30b) must be completed by the Placement Coordinator in liaison with the proposed placement provider. Following this the Placement Coordinator must be assured that the placement provider is:

- a) Aware that they have responsibilities to ensure that the student placed with them receives adequate support and guidance pertaining to their role and/or activities within the placement provider.

- b) Aware of and willing to undertake any role they may have in the assessment of students in a fair and appropriate manner.
- c) Aware that they are expected to provide the UCO School of Osteopathy with feedback about the progress of the placement as requested.

10 Allocating Practice-Based Education Providers & Placements

10.1 Where the UCO School of Osteopathy is responsible for allocating students to a placement, the Placement Coordinator shall ensure that each student has an equal opportunity to undertake a placement at each available placement provider.

10.2 Where the student is responsible for selecting, organising and securing a placement, they must be given sufficient notice of this responsibility as per course/module requirements and must be given adequate guidance from the Placement Coordinator. This guidance may include:

- a) The expectations for the type of placement/WBL activities to fulfil module/course requirements and the appropriateness for level of study.
- b) Considerations of the specific needs of the student with respect to their achievement of the learning outcomes and those arising from any student entitlements, e.g. in relation to disabilities.
- c) Considerations of equal opportunities and inclusivity.
- d) The extent to which the student's preference for type and/or geographical location of placement can be facilitated and supported.

10.3 The student must not commence a placement prior to the approval of the Placement Provider. Where students organise their own placements, the student must understand that any change made to the originally approved placement provider will require a new placement approval process.

10.4 An auditable trail should be kept of all requests to obtain information from both the placement provider and student.

10.5 Students who commence placements without UCO School of Osteopathy agreement will not be insured. This must be made explicit in guidance to students and placement providers.

10.6 Students must complete Appendix 3 prior to any placement.

11 Management & Quality Assurance of Practice-Based Education

11.1 The University retains overall responsibility for the quality management and oversight of placements that form an integral part of any award delivered in its name.

A) The Placement Coordinator

11.2 The Placement Coordinator has overall responsibility of overseeing the management of all practice-based education placements. Their responsibilities normally include:

- a) Ensuring that the risk assessment of the placement is undertaken.
- b) Arranging and/or approving placement providers.
- c) Supporting students in identifying relevant placement.
- d) Ensuring that students are appropriately prepared for their placement, including their responsibilities and induction.
- e) Ensuring that a record/database of students in placement is maintained.
- f) In the case of international students requiring a visa, monitoring and reporting to Registry any changes in students' circumstances whilst on placement, e.g. attendance.
- g) Providing advice and guidance to staff, students, placement providers in relation to placements.
- h) Supporting students for the duration of the placement.

- i) Arranging and/or making visits to students during their Placement for assessment and/or other purposes.
- j) Undertaking and completing an audit record of Practice-Based Education Providers and Placements to provide assurance that due consideration has been given to the management of placements regarding course design, approval and periodic review and that appropriate arrangements are in place to manage the placement/ experience in liaison with Course Leaders and other relevant staff.

B) Auditing Practice-Based Education Providers & Placements (Appendix 3)

11.3 To provide assurance that due consideration has been given to the management of placements regarding course design, approval and periodic review and that appropriate arrangements are in place to manage the placement/ experience, and audit of each Practice-Based Education Provider shall be undertaken:

- a) As part of the approval process when a new course / programme / unit for which practice-based education is integral is approved.
- b) As part of the periodic review process for an existing course / programme / unit for which practice-based education is integral.
- c) As part of the annual monitoring and reporting process for an existing course / programme / unit for which practice-based education is integral.
- d) When is it deemed necessary by the Placement Coordinator, e.g. in response to any concerns or poor feedback raised by the student or the provider.

11.4 The Managing Placements and Work-Based Learning Audit Record (Appendix 4 - AQF16-30d) should be used to record the outcome of the audit and should be included as an appendix to any documentation submitted as part of the UCO's course / unit approval and modification, periodic review and annual reporting and monitoring processes.

c) Approving & Managing Practice-Based Education Placements Checklist

11.5 To enable the effective approval and management processes of Practice-Based Education Placements the checklist provided in Appendix 5 (AQF16-30e) should be used to ensure that all elements are considered pre-, during and post-placement. This checklist should be used in conjunction with the approval process described above.

12 Termination of a Practice-Based Education Placement

12.1 As part of their briefing, students must be made aware of any consequences for failing to successfully complete any required practice-based learning activity.

12.2 The Placement Coordinator and Course Leader should ensure that procedures are in place to identify at an early stage any potential problems which may prevent the progress of the student or the satisfactory completion of the learning outcomes. Students should be informed of the procedures which they should follow and the UCO staff with member whom they should make contact if problems do occur.

12.3 Courses must have in place an appropriate process for considering and supporting students who have failed placement, including opportunities to retrieve the failure, in line with University regulations.

12.4 If it is necessary for the University to withdraw a student in situations where they have consistently demonstrated an unacceptable level of engagement with their placement or, in the event of a student wishing to leave the placement and suspend their studies, the University regulations and procedures for student withdrawal or suspensions of studies will apply.

12.5 The relevant Fitness to Practise Policy may also be applied for the suspension and exclusion of students from their course on the grounds of professional unsuitability, where a student who is registered on a course leading to a professional qualification or conferring practitioner status is deemed to have become professionally unsuitable for that qualification or status.

12.6 The Practice-Based Education Provider must have clear information about the action to be taken if they are no longer able to offer the learning opportunity or if they have any problem or complaint concerning the conduct of the student

Appendices- Supporting documentation, templates and guidance

- a) Appendix 1: Risk Assessment Form for Practice-Based Education Providers
- b) Appendix 2: Placement Provider Health and Safety Questionnaire
- c) Appendix 3: Student Placement Conduct and Health and Safety Agreement
- d) Appendix 4: Practice-Based Education Audit Record

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