MEDICICAL STUDENT PLACEMENT SAFETY POLICY

Definitions.

1. For undergraduate medical students, the GMC define a placement as

"... any arrangement in which a medical student is present in an environment that provides healthcare or related services to patients or the public. Placements can take place in primary, secondary or community healthcare or social care settings. Students can be actively involved in patient care or they can be observing health or social care processes."

2. Definitions as they apply to the School of Medicine, these are expanded at Appendix 1:

a. **Clinical Medicine Placement**. Compulsory clinical teaching delivered in NHS premises and GP Practices. Scheduled and arranged by the School as part of the School-approved course of education. Included amongst such placements are ScotGEM Generalist Clinical Mentor (GCM) Placements.

b. **Clinical Consolidation Block (CCB)**. An optional clinical placement, delivered in NHS premises in the summer vacations at the end of 2nd and 3rd Year of the BSc (Hons) course, scheduled and arranged by the school, paid for by the NHS but not part of the core programme.

c. **Holiday Placement**. Activity organised by a student which may be lab or clinically based, but which is not part of the programme.

d. **Non-clinical Placement.** Compulsory non-clinical teaching delivered in a variety of settings, including the Voluntary Sector, scheduled and arranged by the School as part of the School-approved course of education. Included amongst such placements are ScotGEM 'Agents of Change' placements.

e. **Elective**. St Andrews does not currently offer electives. An Elective is clinical activity, conducted either in the UK or overseas, usually organised by the student but part of a programme. Electives are not covered by this policy

3. **Policy Scope**. This policy details the governance requirements for undergraduate and postgraduate placements carried out within the United Kingdom. The policy applies to students on the BSc (Hons) Medicine course, the MBChB (ScotGEM) course and the MSc Health Psychology course. The policy does not extend to placements undertaken by students of other courses, or those participating in holiday placements. The policy will only apply to students on placements arranged and/or approved by the relevant School of Medicine Course Directors. This policy draws on guidance produced by; the Association for Sandwich Education and Training (ASET), Universities Safety and Health Association (USHA), the General Medical Council (GMC), and the Health and Safety Executive (HSE). This policy has been approved by the University of St Andrews' Chief Legal Officer and the Director of Environmental, Health and Safety Services.

4. **Legal Position**. Under the Health and Safety at Work etc. Act 1974 (HASAWA) students on placement will be treated as equivalent to any other person employed by the placement provider. This means the student must abide by any H&S policies and procedures, and follow any reasonable instruction given by the placement provider designed to protect the health and safety of

the student and others. The student has a responsibility to not only act in a manner which protects their own health and safety, but to make sure their actions do not risk the health and safety of others. Students should be encouraged to raise any issues which they feel may compromise health and safety, or unduly increase the risk of an adverse incident occurring. Since students are classed as employees for the purposes of HASAWA, they will also be covered by the Public Interest Disclosure Act 1998 (commonly referred to as the Whistleblowing Act). They will therefore be protected should they raise any issue related to the health and safety of themselves or others. This is particularly important in relation to medical student placements where there may be patient safety issues to consider. For further information and guidance on whistleblowing or patient safety issues refer to the School of Medicine Patient Safety Policy. It is stressed that, although the preferred and most effective route for raising and resolving health and safety issues is via the employer during placement, students can also raise concerns at any time with their academic supervisor at the University.

5. Some students, whilst on placement, will visit locations in the community with, for instance, health visitors. This will involve additional transport arrangements in private vehicles belonging to the supervising staff, who will also hold appropriate business use insurance. Any vehicle used in these circumstances is regarded as an extension of the workplace and is covered by the HASAWA, therefore students are protected whilst in provider's vehicles. In addition, all NHS staff who require vehicles as part of their role must ensure they meet all the necessary legal requirements for business use and this is monitored by their departments.

6. **Hazard and Risk**. Hazard is generally defined as the potential to cause harm, whereas risk is the likelihood of harm occurring. An activity carried out on placement could be judged to be a high hazard, but if the risk is very low it may be deemed acceptable for this to continue. However, if the activity is deemed to be high risk and the hazard level is also high, it may not be considered prudent to commence or continue with the activity. Most activities will carry some form of hazard and it is impossible to completely remove all risk, but a sensible balance must be struck between the chances of an action causing harm, and the potential level of harm which may be caused by that action. If either the risk or hazard are deemed to be high it does not require that the activity be discontinued, but it may be appropriate to introduce further controls or take steps to mitigate any potential harm, and reduce the risk to "as low as reasonably practicable" (ALARP).

7. For the majority of placements which occur in NHS or community health care settings it will not be necessary to complete an individual risk assessment. A generic risk assessment covering the type of premises (District General Hospital, GP Surgery, Community Hospital, etc.) should prove adequate. However, it may be prudent to carry out a risk assessment on any placement and/or activity which a student will attend or be involved in which is outside the normal scope. This does not necessarily require a site visit, but an examination of the risk factors which are involved may be sufficient to enable a decision to be taken on whether or not the placement/activity will be approved. Completion of the Risk Assessment Form, included at Appendix 2, should fulfil any obligations related to health and safety risk assessment.

8. **Potential Risk Factors**. The UCEA/USHA Guidance has identified 6 potential risk factors

a. **Work**. This relates to the types of activities to be carried out by the student on the placement and the hazards which may be present.

b. **Travel and transportation**. Travelling to and from placements will always carry a certain degree of risk, be this by public or private transport. The nature and location of the placement will determine the level of hazard and risk to be considered.

c. **Location**. The location of the placement may also present a hazard which may differ depending on the background of the student and their familiarity with the type of location and region.

d. **General/environmental**. The environment can be a significant factor for consideration including the surroundings, accommodation and subsistence arrangements.

e. **Individual student**. Individual students have differing levels of knowledge, skills and experience, as well as different characters and personalities. These can all combine to influence the possibility and outcome of any situations encountered. In addition students may have particular needs associated with, for instance, a disability. These needs must be considered and any reasonable adjustments made to accommodate them.

f. **Insurance limitations**. Depending on the circumstances, students will be covered either by the educational institution's insurance arrangements, or those of the placement provider. NHS indemnity may apply to medical students on placement in NHS premises, and placements at GP premises may be covered by the medical malpractice insurance in place, or defence union arrangements.

Incident Management

9. Procedures to manage any reported incidents occurring whilst students are on placement. For undergraduate students, the main hazards are associated with adverse incidents occurring whilst on clinical placement (e.g. needlestick injuries, confrontations with patients/public, transport issues etc.). All incidents occurring whilst under the supervision of a placement provider will be managed according to the procedures in place at that location. Providers will also be requested to email the School to intimate that a student has suffered an adverse incident at the earliest opportunity to allow staff to take any remedial action. Students are also to inform the school if there has been an incident. In either case the school should raise an incident report form.

10. Incidents related to transport (such as non-arrival of taxi/bus, perceived poor driving, etc.) should be reported by the student to the School using the telephone contact provided, or by email if non-urgent. Postgraduate students must inform the School of any adverse incidents related to the placement, if the provider has not already done so. As PG and ScotGEM students manage their own transport arrangements, they alone are responsible for travel to and from the provider premises.

11. Any urgent issue occurring outside normal office hours and affecting undergraduate students on CCB, postgraduate, or ScotGEM students on placement, can be notified to the University of St Andrews out-of-hours service on 01334 476161. The OOH team may refer this to Student Services or the School as befits the situation.

12. **Risk Assessment**. A risk assessment will be completed for each placement, although in practice there are only 6 types of placements:

- a. Urban GP practice
- b. Rural GP practice.¹
- c. District General Hospital
- d. Community Hospital
- e. Ambulance Service
- f. Non-clinical²

¹ Although the placement will not differ from an urban placements the travel conditions and isolation is normally different.

² The majority of these will be associated with the ScotGEM vertical theme programme called 'Agents of Change'

Appendix 1: Further placement information

Clinical Medicine Placements. These placements are attended by students across all 1. three years of the BSc programme and in most years of the ScotGEM Programme. Students will attend placements in GP premises, community hospitals, and with the Scottish Ambulance Service. For most BSc placements, transport is arranged and provided by the School of Medicine for students to and from the relevant locations by buses or taxis. For ScotGEM placements and for some other BSc placements which are at locations closer to the School, students will be asked to make their own way either in their own vehicle, on foot, or by local bus. Any student who wishes to take their own vehicle may do so on the understanding that it is their responsibility to ensure they are licensed and insured to do so, and that the vehicle meets all relevant requirements. No student will be required to travel in the vehicle of another student. However, if they decide to do so, it is entirely at their own risk: the University cannot vouch for the competency or legality of the driver or vehicle, or that appropriate insurance is in place. The hazard level and risk associated with the placement locations and transport provision is relatively low. There is a hazard involved with students encountering patients who may be distressed, or exhibit violent tendencies depending on the nature of the placement. However, students should never be left unsupervised in such situations, and it is the responsibility of the placement supervisor to adequately manage that risk and mitigate any potential hazard. Due to the unpredictable nature of the placements, those with the Ambulance Service have the highest risk/hazard profile. Again, this should be managed by the ambulance personnel who are well used to dealing with high risk and high hazard situations.

2. **Clinical Consolidation Blocks**. CCB's can be located across Scotland and range from placements in district general hospitals in large population centres, to remote rural GP surgeries in the Western Isles or Highlands. The students are responsible for making their own transport arrangements but these must be approved by the School otherwise they may not be able to claim the costs involved. Travel will generally be by public transport but approval may be given for alternative means should this prove more practicable. Students intending to use a private car must seek explicit permission during which they will be asked to confirm that their car is roadworthy, that they have a valid license and that their car is insured. For students attending hospital placements, any accommodation required for the duration of the block will be arranged by the School and this will usually be provided in hospital-managed accommodation. For students in areas which do not have hospital accommodation, the individual student will source and book suitable self-catering or bed and breakfast premises. As with the transport arrangements, this will require approval from the School prior to confirmation otherwise costs may not be reimbursed.

3. **Non-clinical Placement**. Placements such as these are attended by ScotGEM students in most years of the ScotGEM Programme and will include placements in a variety of settings, including the Voluntary Sector. For ScotGEM placements students will be asked to make their own way either in their own vehicle, on foot, or by local bus. Any student who wishes to take their own vehicle may do so on the understanding that it is their responsibility to ensure they are licensed and insured to do so, and that the vehicle meets all relevant requirements. No student will be required to travel in the vehicle of another student. However, if they decide to do so, it is entirely at their own risk: the University cannot vouch for the competency or legality of the driver or vehicle, or that appropriate insurance is in place. The hazard level and risk associated with each placement will vary between locations, but is mainly relatively low. There may be a hazard involved with students encountering members of the public who may be distressed, or exhibit violent tendencies depending on the nature of the placement. However, students should never be left unsupervised in such situations, and it is the responsibility of the placement supervisor to adequately manage

that risk and mitigate any potential hazard. For the small number of placements considered to have of a higher risk/hazard profile, again, this should be managed by the placement supervisor who will be used to dealing with high risk and high hazard situations. Further details of assessment, management and mitigation of risk can be found in the 'ScotGEM Student Placement Agreement (Non-clinical)', which is negotiated, agreed and signed for each student placement.

4. **MSc Health Psychology Placement**. Students on the MSc Health Psychology course attend a series of placements in a variety of University, NHS and community care settings. As with the other types of placement, students will be classed as employees and will be subject to the same protection as any other member of staff or visitor. MSc students are scheduled to attend twelve placements over the duration of the course. Four of these are self-organised and classed as electives and are therefore outside the scope of this policy. The remaining eight placements are organised and arranged by the School and are subject to the same conditions as other placements in respect of health and safety arrangements. Students make their own travel arrangements and these are not notified to, or authorised by, the School. Students may visit other sites during a placement which could involve travelling in the vehicle of the staff member(s) to whom they are attached.

Host Organisation/Placement Provider								
Name								
Location								
1 General Control Measures								
	Ye	s	No	Action Required	Action Completed			
Has the placement provider confirmed placement acceptance in writing?								
Has the placement provider been used before?								
 If Yes, are there any unresolved issues? 								
Have students received sufficient briefing on this placement?								
2 Risk Assessment and further specific actions necessary								
		Risk Pro		Action Required	Action Completed			
Work factors	High	Mediu	Low					
Travel and transportation factors								
Location and / or regional factors								
General / environmental health factors								
Individual student factors								
Insurance limitations								
3 Conclusions								
	Ye	6	No	Action Required	Action Completed			
Are any risks controlled by methods other than standard NHS practice?								
Do residual risks, particularly of violence or infection, give concern despite controls								
Is a site safety visit required prior to approval?								
Form Completed by: Date:								
Print name:								
Placement Approved				Yes 🗆	No 🗆			
Approved by:				Date:				
Print name:								
Sign name:								

Author:	School manager (DCM)	Approval Committee:	Placement team	
Consultees:				
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Version Control Record (expand table as required)

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