

Code of Practice for Work-Based and Placement Learning

2020-21

Technical updates of this document are undertaken on an annual basis to reflect changes to the University's organisational and management structures and to incorporate earlier, approved amendments to related policies, procedures and regulations

This document relates to the current year. If you become aware of any previous versions that are available on line please notify SEO@bolton.ac.uk so that action can be taken to remove the document(s).

Contents

1	Introduction	3
2	Definitions	4
3	Types of Placement	5
4	Responsibilities of Key Stakeholders	5
5	Student Support and Information	10
6	Staff Development	11
7	Monitoring and Evaluation	11
8	Work-Based/Placement Learning for Students with a Disability	12
9	Health and Safety	12
App	pendix 1: Work-Based/Placement Learning Assessment Form	15

1 Introduction

- 1.1 The Code sets out the University of Bolton's expectations for work-based and placement learning. It provides guidance for academic teams involved in the organisation, management and administration of work-based and placement learning.
- 1.2 Whilst the Code seeks to provide a level of consistency, it is also intended to be flexible to allow for the specific requirements of individual Schools and their programmes, and any professional, statutory or regulatory bodies (PSRBs) to be met.
- 1.3 The Code is informed by and based on the precepts of the Quality Assurance Agency's (QAA) UK Quality Code for Higher Education: Part B: Assuring and Enhancing Academic Quality; Chapter B10: Managing Higher Education Provision with Others
- 1.4 The Code sets out a series of principles that should be adhered to whenever work-based/placement learning is incorporated within academic programmes both at an undergraduate or postgraduate level.
- 1.5 The Code applies to the University of Bolton and, where applicable to collaborative provision, it is expected that partner organisations will adopt the Code or have an equivalent approach which will be agreed at programme approval.
- 1.6 The Code of Practice *does not* cover work-based/placement learning outside the University that is not a credited part of a programme of study, such as part-time, term-time and vacation work which students have arranged for themselves.
- 1.7 The Code of Practice aims to ensure that:
 - Students undertaking work-based/placement learning are aware of the risks associated with the environment in which they are in, and have taken appropriate steps to minimise them.
 - Students have access to appropriate support and guidance before, during and after their work-based/placement learning.
 - All parties involved clearly understand their roles and responsibilities— e.g. the School, the student and the work-based/placement learning provider.
 - The value of work-based/placement learning is maximised to develop students' skills, knowledge and employability.
- 1.8 Heads of School (or their off campus equivalent) are required to ensure compliance with the principles of the Code for their own programme teams and ensure that a handbook(s) is available for staff and students.
- 1.9 Activities not covered by this Code include:

- Field trips, residential, employer visits, and short periods outside of the University when managed/supervised by University of Bolton staff.
- Situations where students have a break in their studies to take advantage of a volunteering opportunity.
- 1.10 The Code should be read, where necessary, in conjunction with other Codes of Practice and/or policies within the University (see Student Policy Zone).

2 Definitions

- 2.1 Work-based learning is learning that is integral to a higher education programme and is achieved and demonstrated, wholly or predominantly, through engagement with a workplace environment. Typically it is focused around an occupation either paid or unpaid and will be measured and assessed against specific learning outcomes and/or competencies.
- 2.2 Placement learning is a credit-bearing, planned period of learning which takes place either internally (i.e. Sport and Spinal Injury Clinic, Athlete Development Centre) or outside of the University of Bolton. A placement is defined as work experience, assessed project work or a period of course-based study (for which academic credit is awarded and where the student remains subject to University of Bolton regulations during the relevant period) where there is a transfer of direct supervision of the student to a third party for a period of time. It includes those circumstances where students have arranged their own learning opportunity with a placement provider, with the prior approval of the University.
- 2.3 **Learning outcomes** describe what a student should be able to do or demonstrate, in terms of particular knowledge, skills and attitudes, as a result of learning.
- 2.4 Placement staff/Employment Engagement Consultants (e.g. Module Tutors, Programme Leaders, University Link Lecturers, Placement Coordinators) are staff designated by the University of Bolton to arrange and/or approve placements and support students during the placement period.
- 2.5 **Placement provider** includes persons, partnerships, companies, institutions and other organisations providing opportunities for placement learning.
- 2.6 **Placement supervisor** is a person, employed and designated by the placement provider, who is responsible for supervising the student whilst on placement.
- 2.7 Placement mentor is a person designated to facilitate the student's professional and personal development in the work place. Some PSRBs have specific requirements which must be met in relation to mentoring.

3 Types of Placement

- 3.1 The types of placements available to students can take many different forms. They can include: short or extended placements, full-time or part-time, paid or unpaid, assessed or unassessed, formal or experiential learning and studying or working abroad.
- 3.2 The University's relationship with the placement provider will vary with the nature of the placement. This may be, for example, a student negotiated placement or a formal arrangement with a single employer who offers multiple placements. Whichever form the relationship takes the principles of the Code must be followed at all times.

4 Responsibilities of Key Stakeholders

4.1 Responsibilities of the University

- 4.1.1 The University recognises and values the importance of work-based/placement learning and its current and potential future benefits for the approach to students' learning and employability.
- 4.1.2 The University will ensure that the academic standards applied to the assessment of work-based/placement learning are consistent with normal University practices, with available subject benchmark statements and, where appropriate, professional or regulatory body requirements.
- 4.1.3 Arrangements for work-based/placement learning should be approved at validation/programme review. Any subsequent changes to the validated arrangements should be undertaken via the Module Modification Approvals process.
- 4.1.4 The University will ensure that, as far as is practicable, the potential for discrimination that could arise within a prospective placement is considered, taking special consideration of the protected characteristics in the Equality Act 2010. Where there are students with a disability, specialist advice may need to be accessed from the Disability Team.
- 4.1.5 The University will ensure that procedures are in place for dealing with complaints relating to the work-based/placement learning and that programme teams are aware of and can make use of them. A record will be kept of all formal complaints and the follow up action taken in line with the University complaints procedure.

4.2 Responsibilities of Heads of School

- 4.2.1 Heads of School will ensure that explicit reference is made in all relevant documentation of the intended learning outcomes of all work-based/placement learning. The assessment of such learning must form part of a coherent learning strategy for the programme and/or the module as a whole, be reflected in the programme specification, module specification and assessment guidelines, and be subject to the normal processes of assessment and moderation.
- 4.2.2 Heads of School will ensure that staff who are involved in work-based/placement learning within their teams, are competent to fulfil their role and training and development needs are identified and addressed.
- 4.2.3 When undertaking summative assessments, Heads of School must ensure that University and/or placement staff involved are suitably qualified, trained and supported.
- 4.2.4 Heads of School will ensure that the academic standards of any work-based/placement learning are consistent with normal programme monitory practices.

4.3 Responsibilities of Programme Leaders (or equivalent e.g. Directors of Studies)

- 4.3.1 Programme leaders will seek to align the learning opportunities to appropriate professional practiced-based standards where appropriate.
- 4.3.2 Programme leaders will ensure that the overall aims, outcomes, roles and responsibilities relating to work-based/placement learning will be clearly defined and communicated to all parties (students, staff and placement providers). This can be achieved through the use of placement agreements, learning contracts, letters, handbooks for students, staff, and employers or other relevant correspondence that is deemed appropriate.
- 4.3.3 Programme leaders should have appropriate procedures in place if, for any reason, a student is unable to achieve the learning outcomes with the agreed placement provider, due to a change in circumstances.
- 4.3.4 Programme leaders should consider the impact that academic failure in the work-based/placement learning element may have, and incorporate provision for re-assessment of those elements within the overall assessment strategy.
- 4.3.5 Programme leaders will ensure that students receive sufficient preparation for their work-based/placement learning through a variety of means including one

- to one guidance, placement handbooks and preparation sessions as appropriate.
- 4.3.6 In the event of a work-based/placement learning provider withdrawing from a placement agreement the relevant programme leader will ensure that appropriate and expedient communication, guidance and support is available, and will try to ensure where possible, to allow the student to continue. Students should be made aware of this in the placement documentation.
- 4.3.7 Each programme leader should clarify the level of competence necessary for the student to perform well whilst on placement.
- 4.3.8 Where work-based/placement learning is assessed summatively, programme leaders must ensure that appropriate arrangements are in place to ensure that such assessments and their outcomes are subject to the same internal and external moderation processes as other assessments. This will include providing the external examiner the opportunity to comment specifically on this element.
- 4.3.9 Each programme must have agreed procedures for securing, approving and allocating work-based/placement learning opportunities. These will be defined at the programme approval stage and, subsequently, at the review stage, and set out in the relevant programme documents e.g. module specification, placement handbook etc.
- 4.3.10 Staff responsible for work-based/placement learning should determine that a placement provider is able to:
 - Provide learning opportunities which enable the intended learning outcomes to be achieved. These learning outcomes should be identifiable.
 - Support students during their placement and help with overall assessment.
 - Provide a copy of their health and safety policy and ensure that students on placement are able to access it.
- 4.3.11 Programme leaders must ensure that where a student may be supporting a vulnerable client group, or in circumstances involving preparation to practice, evidence is available to show that students intending to take up a placement have undergone appropriate legal checks, in line with current procedures within the country of operation; in the UK this will be a DBS check.
- 4.3.12 Programme leaders will provide guidance to placement providers regarding their involvement in the review and monitoring of the progress of students, and will be kept informed about the mechanisms for reporting to the University of Bolton at the end of the work-based/placement learning opportunity.

- 4.3.13 It is good practice to inform the placement provider about potential visits from academic or placement staff, and any change(s) in the student's circumstances, in advance of the placement commencing.
- 4.3.14 Programme leaders should take into account extra checks to ensure the suitability of particular placements for a student with a disability. For example, it would be unreasonable to place a student whose disability causes fatigue in a placement location that involved a long commute to and from the placement over and above their normal commute time to University.
- 4.3.15 In some Schools placement visits will be mandatory, but, where this is not the case, placement visits will depend on the nature, duration and location of the placement and the specific needs of the student. Frequency of visits should be made clear in all placement handbooks.
- 4.3.16 Programme leaders will ensure that if mentors are involved in student assessments then thorough and appropriate training has been provided.
- 4.3.17 Programme leaders will ensure, where practical, that External Examiners are offered the opportunity to visit placement providers and meet the students to discuss their work-based/placement learning opportunity.
- 4.3.18 Programme leaders and placement staff should encourage placement providers to discuss any concerns at an early stage in order to ensure a positive experience for the student.

4.4 Responsibilities of the Student

- 4.4.1 In the context of work-based/placement learning, students have a responsibility to prepare well for the placement opportunity by clarifying learning outcomes and drawing up a learning contract where appropriate.
- 4.4.2 Students should behave responsibly as a representative of the University of Bolton whilst on placement, and as such should adhere to the policies, procedures and practice as laid down by both the University and the placement provider.
- 4.4.3 Students should report any problems to the placement provider and the University of Bolton that might prevent the progress or satisfactory completion of the work-based/placement learning. In the event of a student withdrawing from a placement, they should report the reasons to the placement provider and the relevant placement staff at the University as soon as possible.
- 4.4.4 Students should always adhere to the health and safety requirements and other procedures of the placement provider.

- 4.4.5 Students should report immediately or as soon as possible to their School any incidents in which they are involved and any health and safety concerns that are not addressed by their placement provider.
- 4.4.6 Students should complete any work set as appropriate by the placement provider and record their progress and achievements.
- 4.4.7 Students should evaluate and comment on the benefits of their experience in terms of their learning at the end of the placement.
- 4.4.8 Students with a disability should consider the level of disclosure they should give to a placement provider to ensure that reasonable adjustments can be put in place.

4.5 Responsibilities of the Placement Provider

- 4.5.1 Placement providers should have a named person with responsibility for the work-based/placement learning.
- 4.5.2 Provide the student(s) with a full and clear induction to the organisation and its working practices, including health and safety arrangements, fire precautions and emergency evacuation arrangements, how to report accidents, incidents etc.
- 4.5.3 Inform the programme team of any particular risks or hazards associated with the placement.
- 4.5.4 Placement providers must support their own staff to engage with training/development activities, particularly if they are involved in the mentoring and/or assessment of students.
- 4.5.5 Participate in monitoring visits with staff from the University of Bolton.
- 4.5.6 Placement providers are to monitor and evaluate the work-based/placement learning and provide feedback to the University as appropriate about the progress of students.
- 4.5.7 The placement provider must report as soon as possible to the University details of any serious accidents or incidents involving students or breaches of discipline by a student, or (where necessary) lodge a complaint regarding a student on placement with them.
- 4.5.8 Placement providers should ensure their compliance with the Equality Act 2010, or other relevant legislation if based outside the UK, and are encouraged to make reasonable adjustments for students with disabilities, specific learning difficulties and medical conditions.
- 4.5.9 Placement providers should keep a record of attendance for the student on work-based/placement learning.

- 4.5.10 Placement providers will provide a non-discriminatory environment which is free from discrimination or harassment on the basis of age, disability, ethnicity, gender, nationality, religion or belief and sexual orientation.
- 4.5.11 Students should receive regular and constructive feedback on their progress and development during their work-based/placement activity from the placement provider as appropriate.

5 Student Support and Information

- 5.1 Students must be fully informed about their responsibilities and entitlements relating to their work-based/placement learning and the University of Bolton require all Schools to provide their students with appropriate guidance and support in preparation for, during and after their work-based/placement learning.
- 5.2 The use of standard University-wide and/or School-wide documentation is recommended where possible.
- 5.3 This guidance should be in written format and may take the form of a dedicated handbook or be incorporated into relevant course information. This information should also be accessible through the University website and through Moodle.
- 5.4 The following is an indicative list of areas which, where appropriate, should be covered by the guidance for students:
 - Professional conduct and behaviour
 - Support available when the responsibility for securing a placement rests with the student
 - Establishing a learning agreement with the placement provider
 - Cultural orientation, work expectations and ethical considerations
 - Health and safety issues and appropriate information relating to the induction period
 - Confidentiality and/or data protection, intellectual property and copyright issues
 - Applicability and procedures for Disclosure and Barring Service (DBS) checks
 - Legal issues including visa requirements
 - Occupational health considerations or requirements including immunisation
 - Precautions that should be taken to maximise personal safety
 - Nature of insurance cover that is provided by the University and the possibility of acquiring additional personal insurance where appropriate, including the use of personal transport and medical insurance cover
 - Availability of additional language or skills preparation
 - The University support services that will remain available to students during the work-based/placement learning period.

6 Staff Development

- 6.1 All Heads of School will ensure that staff for whom they are responsible and who are involved in work-based/placement learning will be appropriately qualified and competent to carry out their role(s).
- 6.2 Heads of School will ensure that their staff have opportunities for additional training where relevant, and access to information relevant to their role. Development needs in relation to work-based/placement learning should be considered within the staff performance review process.

7 Monitoring and Evaluation

- 7.1 All placements should be subject to effective monitoring and evaluation. Programme teams will monitor and review the effectiveness of their procedures for securing work-based/placement learning, as well as the placements themselves. This shall be conducted via the School Board and reported in the annual Programme Plan.
- 7.2 Programme teams must formulate procedures for:
 - Gaining feedback from work-based/placement supervisors and students on progress and concerns.
 - Reviewing the progress of students at various points throughout the placement opportunity.
 - Utilising the feedback from work-based/placement staff, supervisors and mentors, external examiners and students.
 - Receiving feedback on the quality and standards of the work-based/placement experience and taking appropriate action.
 - Gathering feedback on a formal and informal basis from placement providers about the arrangements that have been put in place.
- 7.3 Evaluation of work-based/placement learning should be formally recorded and summarised by students via a Module Evaluation Report.
- 7.4 Consideration should be given to the overall placement experience, including the effectiveness of the placement in enabling the student to achieve the intended learning outcomes and the quality of support provided by placement staff.
- 7.5 Other factors for consideration include:
 - The availability of suitable placements and any instances in which placing students proved a challenge.
 - The identification of any good practice in terms of placement processes which is worthy of dissemination.
 - Preparation of students and placement staff for their respective roles.

- The effectiveness of communication between the University of Bolton and placement providers.
- 7.6 Any issues arising from placements should, like other module issues, be considered at the Student-Staff Liaison Committee (SSLC) meetings and feed into appropriate programme plans. Feedback from External Examiners (who may in some cases have the opportunity to visit placements) and from placement providers should also be used in the review of the placement experience.

8 Work-Based/Placement Learning for Students with a Disability

- 8.1 If any special requirements are needed by a student who has a disability, the student and the programme team should be advised to consult the University's Disability Service. Students in partner organisations should contact their named Disability contact within their own institution in the first instance. Then, any additional requirements or reasonable adjustments should be discussed and agreed with the placement provider in advance of the placement starting. The Disability Service can provide advice but it remains the responsibility of the programme team to discuss relevant matters with the placement provider.
- 8.2 Programme teams and placement staff should always seek permission from students before disclosing information on disabilities or other protected characteristics to placement providers. In some cases there may be a legal obligation to share (or not share) information regarding the nature of a disability with placement providers, particularly if the disability has implications for the health and safety of them or others. Advice must be sought prior to the placement from the Disability Team within the University.
- 8.3 Programme teams and placement staff are responsible for liaising with the Disability Service to determine funding eligibility for additional support for students with a disability, for example a BSL interpreter or a sighted guide, well in advance of the placement.

9 Health and Safety

- 9.1 The work placement should be safe and provide a learning environment that has controlled risks for the evidence based and reflective practice.
- 9.2 All students will be subject to the University's Work Placement Policy and the Universities & Colleges Employer Association (UCEA) Health and Safety Guidance for the placement of Higher Education Students. Details of the UCEA document can be found at www.ucea.ac.uk
- 9.3 Activities in the workplace are governed by the Health & Safety at Work Act 1974 and the supporting Regulations; Orders; Statutes; Codes of Practice and Guidance Notes.

- This requires a general duty for placement providers to provide a safe place of work for and including students on work-based/placement learning.
- 9.4 The Management of Health and Safety at Work Regulations 1999 further extend the employer and placement provider's duty to conduct risk assessments on articles, substances, equipment, activities, etc. relating to the workplace. This also includes the need for a risk assessment associated with work-based/placement learning. There is considered increased risk for work placement students because of their lack of experience and attitude toward health and safety risks. The UCEA guidance requires a vetting process to be conducted by the University to assess the risks to health and safety of a student whilst on placement. If the placement is considered to not meet an adequate standard of safety, then the University is duty bound to establish an action plan with the placement provider to effectively manage or control the risks to the student prior to, or within a reasonably short timescale.
- 9.4 The student should commit themselves to the spirit of the work-based/placement learning and in doing so, comply with the various legislation imposed on the placement provider in managing and controlling the risks associated with the placement activities.
- 9.5 It is important that the student discloses any medical conditions as to why they are not able to complete any aspect of the work-based/placement learning, by advising the programme leader, module tutor or placement coordinator as soon as possible.
- 9.6 Throughout the work-based/placement learning, students must adhere to the Code and work only under the direct supervision of the Placement Supervisor. A nominated member of staff from the University will be assigned to each student as a source of reference and support to students whilst on their work-based/placement learning.
- 9.7 The Programme Leader, in liaison with the Placement Supervisor, must ensure that appropriate arrangements are agreed and in place for University staff and students working in premises not under the sole control of the University. Programme Leaders should ensure that a risk assessment is carried out for any new work-based/placement learning opportunity, including appropriate investigations being made into the health and safety arrangements in place for the learning/working environment. The risk assessment form is attached at appendix 1.
- 9.8 It is acknowledged that some placements will have specific agreements that identify that a risk assessment is not required. The Head of School must be informed and must approve this arrangement in order to establish whether a risk assessment needs to be carried out and whether this arrangement be reviewed.
- 9.9 The necessity for a site visits extends to most placement learning opportunities. It is acknowledged, however, that in some circumstances it may be unrealistic or inappropriate for a site visit to be undertaken. In such cases, the risk assessment

should be carried out on the basis of the information available. If there are reasonable concerns regarding the safety of students on the work-based/placement learning following the risk assessment, it may be necessary for the Programme Leader to reconsider undertaking a site visit. In cases where the Programme Leader does not carry out a site visit on the basis that it is not reasonably practical, it should record the reasoning for this on the Risk Assessment Form.

- 9.10 In terms of Health and Safety Policy considerations, Heads of School should satisfy themselves of the following:
 - If it is a requirement for an organisation to have a Health and Safety policy, the placement provider should confirm that they have one to the University.
 - It is sufficient for the placement provider to confirm that they are compliant with their own Health and Safety policy and that there is a mechanism in place for students on placement to familiarise themselves with it.
 - Programme teams should instruct students to familiarise themselves with the Health and Safety Policy of the placement provider.
 - For placements where there is no legal requirement to have a Health and Safety Policy, discussions must be held between the Programme Leader and the student as to what are appropriate risks and health and safety measures to be undertaken.
- 9.11 It should be noted that in the case of clinical work, there may be additional health and safety requirements, depending on the nature, purpose and location of the clinical experience. Responsibility for health and safety in clinical work lies with the programme of study to which the student belongs.
- 9.12 When planning a placement learning opportunity, University staff and partners may find it helpful to refer to guidance published by Universities and Colleges Employers Association (UCEA) on the implementation of good Health and Safety Practice on placements:
 - Guidance on Health and Safety in Fieldwork:
 http://www.ucea.ac.uk/objects store/guidance on health and safety in fieldwor
 k.pdf
 - Guidance on Health and Safety for the placement of Higher Education Students:
 http://www.ucea.ac.uk/objects_store/ucea_health_and_safety_guidance_for_the_placement_ofhe_students.pdf
- 9.13 Where Programme Leaders have concerns regarding the risk based approach to Health and Safety of individual placements, they should contact the University's Health and Safety Advisor.

Appendix 1: Work-Based/Placement Learning Assessment Form



Teaching Intensive Research Informed

1. PLACEMENT DETAILS						
Organisation Name:						
Occupational Area:						
Postal Address:		N	Nature of Business:			
		N 4	Main Contact: Mr, Mrs, Miss, Ms Dr, Other			
Post Code:		IVI	Main Contact: Mr, Mrs, Miss, Ms Dr, Other			
Telephone No.:		P	Position:			
Fax No.:			Employer Health & Safety Representative / Competent			
rax No			Person:			
Mobile No.:			University Representative (tutor or supervisor):			
Email address:		L	-			
Web Site:						
Number of Employees:	F/T	P/T		Other	Total	
What is preferred met	hod of Contact					
	1.4.1					
Information contained ir Please indicate if you w		used to co	ontact you tro	om time to time. Yes] No □	
2. INSURANCE DETAILS						
Current Insurance Cover			Please tic	k the relevant one		
Employers Liability						
Public Liability						
Vehicle/Plant						
3. SUPERVISION						
3.1 Will the Employer provide Supervision / Safeguarding Yes or No						
Name:						
DEPUTY SUPERVISION						
3.2 In the absence of the main supervisor who will supervise the learner/ employee? Yes or No Name:					mployee? Yes or No	
IVAITIG.						

4. HEALTH AND SAFETY							
4.1	Health and Safety Policy			Yes/No			
Α	Is there a clear commitment to health, safety & welfare (written policy statement mandatory when 5 or more employees)?						
В	Are the responsibilities and arrangements for health and safety clearly stated (recorded						
				1			
4.2	Risk assessment and control			Yes/No			
Α	S S S S S S S S S S S S S S S S S S S						
В	Have the significant findings and details of any groups identified (e.g. young persons/ vulnerable adults inexperience) as being especially at risk been recorded (this is optional where there are fewer than 5 employees)? Comments:						
С	Give details of the risks and control measures relating to the occupations and the specific activities carried out in the workplace.						
D	How are the risks and control measures explained to employees and others?						
Е	Are risk assessments reviewed e.g. i	n light of the findings fro	m monitoring activities	?			
			-	'			
4.3	Fire and emergencies			Yes/No			
Α	Has the Employer carried out a fire ri	sk assessment?					
В	Is there a means of raising the alarm	and fire detection in pla	ace?				
С	Are there appropriate means of fighti						
D	Are effective means of escape in place	ce including unobstructe	ed routes and exits?				
Comments:							
5. EMPLOYER APPRAISAL / ORGANISATIONAL NEEDS ANALYSIS- ACTION / RECOMMENDATIONS							
5.1	Agreed Action						
ACTION		BY WHOM	BY WHEN	COMPLETION DATE			
5.2 Appraisal Summary and Recommendations							
5.3 To be completed by Program Leader / Academic Group Leader (FOR OFFICE USE ONLY)							
The above named company is authorised with effect from Date:							
Signature: Print:							

CODE OF PRACTICE FOR WORK-BASED AND PLACEMENT LEARNING				
Policy ref:				
Version number	03			
Version date	15 TH July 2020			
Name of Developer/Reviewer	Julie Bateman/Lisa Cove			
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Person responsible for implementation (postholder)	Head of School			
Approving committee/board	Senate			
Date approved	23/05/16			
Effective from	24/06/16			
Dissemination method e.g. website	Website			
Review frequency	Every three years			
Reviewing committee	Senate			
Consultation history (individuals/group	Drafts of the regulation have been			
consulted and dates)	considered by:			
	Education Committee			
	Senate			
Document history (e.g. rationale for and	This was major re-write of the previous			
dates of previous amendments)	Code of Practice			
	July 2020 - technical updates incorporated			