

POLICY AND PROCEDURE MANUAL

Policy Title:	STUDENT PLACEMENT PROCEDURE	Area of Responsibility: VICE PRESIDENT, ACADEMIC
Policy Section:	GENERAL ACADEMIC	
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1.1.10 STUDENT PLACEMENTS

1. Purpose

1.1 This procedure outlines the steps required when arranging and monitoring unpaid work placements for students in the community as part of the student’s program requirements at St. Clair College.

2. Scope

2.1 This policy applies to all programs in which students participate in unpaid work placements as part of their program requirements. This policy covers:

2.1.1 Requirements for Letter for Placement Employer and Due Diligence Checklist.

2.1.2 Requirements for Student Placement Declaration.

2.1.3 Requirements for Insurance Coverage for students while at work on unpaid placement.

2.1.4 Requirements for Injury Reporting while at work on unpaid placement.

2.1.5 Requirements for Medical Requirements, as applicable.

2.1.6 Requirements for Non-Medical Requirements, as applicable.

2.1.7 Ministry of Colleges and Universities (MCU) Reporting, as applicable.

3. Definitions

3.1 Learner: To be considered a Learner:

- (a) Must be a registered student with St. Clair College;
- (b) The placement must be formally authorized by St. Clair College;
- (c) The student must participate in the activities of the placement employer's industry; and,
- (d) The student is not paid by the employer.

3.2 Learners do not include:

- (a) Students who on their own initiative volunteer their services to an employer to develop marketable work skills;
- (b) Volunteers who offer their time or services for community or charitable purposes;
- (c) Students on an employer's premises solely for the purpose of visiting or casual observation and who, at no time, participate in activities of the employer's industry; and,
- (d) Students who, as part of their programs, do unpaid research for St. Clair College.

3.3 Placement Coordinator:

For the purposes of this procedure, Placement Facilitator will be defined as those College employees who are responsible for, arrange for, or complete paperwork for student placements. It is the responsibility of the Chair of the respective Academic Department to determine how the activities are apportioned. Career Services staff will provide support to the Academic Departments assisting with developing and maintaining Placement Employer relationships, and completion of requisite paperwork with Placement Employers and Learners. Career Services staff will also provide support to the Academic Departments acting as a liaison among Placement Employers, students and program/placement facilitators to assist with concerns and escalate any high level concerns to the appropriate Chair (except in the School of Nursing and School of Health Sciences where there are designated persons in each department required to liaise among Placement Employers and students due to the nature of clinicals and field placements in these Schools).

3.4 Mandatory Medical Requirements, as applicable:

In accordance with the current Ontario Hospital Association Communicable Diseases Surveillance Protocols and the Canadian Immunization Guide, students in programs with field placements/clinicals where there is contact with vulnerable individuals must complete a medical evaluation and obtain medical clearances.

3.5 Mandatory Non-Medical Requirements, as applicable:

- 3.5.1 **Police Clearance** is a criminal record check conducted by police authorities. It includes any charges that have resulted in convictions. A Vulnerable Sector Police Clearance is a collection of offense information including convictions, outstanding warrants, charges, and judicial orders. It will also include sexual offense convictions for which the individual has received a pardon.
- 3.5.2 **Standard First Aid**, as applicable depending on program/clinical/placement.
- 3.5.3 **CPR**, as applicable depending on the program/placement and level dependent on program/clinical/placement.
- 3.5.4 **N95 Mask Fit** testing as respirator use and proper fit is mandatory for all students in health care programs/clinical/placements.
- 3.5.5 Placement Employers must ensure students working in construction complete Ministry of Labour, Training and Skills Development (MLTSD)-approved **Working at Heights** (WAH) training before they start work at heights and use fall protection equipment.

4. Roles and Responsibilities

4.1 Letter to Placement Employer, and Due Diligence Checklist

- 4.1.1 Each Chair, or their designate, is responsible for informing Career Services of all placement agencies engaged by the Programs in their School. Career Services will be responsible for ensuring that a Letter to Placement Employer and Due Diligence Checklist or Placement Agreement is completed for all placement agencies. For Placement Employers who require a formal Placement Agreement due to institutional requirements, Career Services will coordinate with the Chief Financial Officer and Administrative Assistant to the Chief Financial Officer to review and execute formalized Placement Agreements. On the Letter to Placement Employers, the Placement Employer will indicate whether or not they are covered under Ontario's Workplace Safety and Insurance Board (WSIB). Career Services staff will assist by liaising with Placement Employers to complete the requisite paperwork, maintaining completed electronic copies of the documents and providing secure electronic access to the applicable Academic Departments as well as the Manager, Health, Safety and Wellness, as required.
- 4.1.2 Career Services will maintain a list of placement sites with which the College has formalized placements. Within the database, Career Services will maintain Placement Employers' contact information, placement details and employer engagement.
- 4.1.3 When arranging work placements, Placement Facilitators should review the Due Diligence Checklist completed by the Placement Employer, where applicable, to review the workplace safety practices at the potential Placement Employer's worksite prior to sending Learners to that workplace. Placement Employers are required to provide training and acquaint the Learners with the hazards in the placement site and to encourage the Learner to alert their placement site supervisor immediately if they see something that could endanger their safety.

4.2 Student Placement Declaration

- 4.2.1 Career Services will be responsible for ensuring that a completed and signed Student Declaration is in place for each student prior to commencing a placement. The placement student will be responsible to read and understand the Student Declaration that WSIB or private insurance coverage will be provided through the Ministry of Colleges and Universities (MCU) while the student is on unpaid work placements as arranged by the College as a requirement of the student's program of study. Career Services staff will assist the Academic Departments by liaising with placement students to complete the requisite Student Declaration, maintaining completed electronic copies of the documents and providing secure electronic access to the applicable Academic Departments as well as the Manager, Health, Safety and Wellness, as required.

4.3 Insurance

- 4.3.1 The Government of Ontario, through the Ministry of Colleges and Universities (MCU), pays the WSIB for the cost of benefits provided to Learners enrolled in an approved program at St. Clair College and participating in unpaid work placements with Placement Employers who are either compulsorily covered or have voluntarily applied to have WSIB coverage.

- 4.3.2 MCU also covers the cost of private insurance with Chubb Insurance (formerly ACE-INA Insurance) for Learners enrolled in an approved program at St. Clair College and participating in unpaid work placements with Placement Employers that are not required to have compulsory coverage under the Workplace Safety and Insurance Act or unpaid placements out of province.
- 4.3.3 Career Services will coordinate with the Finance Department to obtain a Certificate of Insurance for Placement Employers who require one. Once the Certificate has been received, it will be sent by the Finance Department to the requesting Placement Employer. Placement agencies requesting a Certificate of Insurance are asked to provide St. Clair College Finance Department with a copy of their Certificate of Insurance as well. The Certificate of Insurance expires on an annual basis. The Finance Department will automatically renew the Certificate of Insurance for each Placement Employer. Prior to the automatic renewal, the Finance Department will contact Career Services to identify which Placement Employers should be removed from the renewal list. A Placement Employer will be removed from the list when it no longer has a Letter to Placement Employer/Placement Agreement in effect and no longer has Learners working on unpaid placements at its workplace.

4.4 Injury, Illness or Exposure Reporting

- 4.4.1 The Letter to Placement Employers or Placement Agreement, as applicable, advises placement agencies about the reporting responsibilities if a placement student is injured at the placement site. If an injury involves any of the following, it is reportable to WSIB or Chubb Insurance (for claims where WSIB does not apply):
- (a) requires medical aid (i.e. visits a physician, chiropractor, etc.)
 - (b) results in lost time (missing any time from placement); or,
 - (c) results in modified work arrangement exceeding seven days.
- 4.4.2 The following forms only need to be completed if there is a workplace injury, illness, or exposure while a student is on an unpaid placement:
- (a) Incident Report and Investigation Form (this allows the Health, Safety and Wellness Manager to receive the required information to complete WSIB or Chubb Insurance) and this form is to be completed by the Placement Employer or clinical supervisor, and signed by the Program Chair or the Program Chair's designate. The completed and signed Incident Report Form needs to be sent to the Health, Safety and Wellness Manager within 24 hours;
 - (b) Postsecondary Student Unpaid Work Placement Workplace Insurance Claim is to be completed by the Placement Employer and/or clinical supervisor and signed by the Placement Employer; training agency (College) representative - Health, Safety and Wellness Manager; and, the student;
 - (c) Letter of Authorization to Represent Placement Employer is to be completed by the Placement Employer or clinical supervisor (providing that the placement is covered through WSIB);
 - (d) WSIB 2819A Report on Needlestick Injury or Body Fluid Splash is to be completed for needle stick or bodily fluid splash injuries only. The form is to be completed by Placement Employer or clinical supervisor and the student is to follow up with the College's Health Centre;

- (e) WSIB Employer's Exposure Incident Form is to be completed when there is an unplanned incident exposure from a leak, spill, explosion, release, or unexpected contact with a chemical or other substance. The event may have exposed workers to an infectious, chemical, or other substance. This form is intended for unplanned exposure where there has been no lost time or illness. The purpose of this form is to obtain information about the exposure incident experienced by the worker should an illness or disease occur in the future;
 - (f) Forms (a), (b) and (c) noted above must be completed for all WSIB reportable injuries or incidents while on placement, and need to be completed, signed and returned to the Health, Safety and Wellness Manager within 24 hours; and,
 - (g) The Report on Needlestick Injury or Body Fluid Splash Form is only required for needle stick or body fluid splash incidents and the Employer's Exposure Incident Form only required for Exposure incidents.
- 4.4.3 The Manager, Health, Safety and Wellness, is responsible for filling out and submitting, within the mandated deadlines, the WSIB or Chubb Insurance forms, as required, upon notice of an injury to a student on an unpaid work placement.
- 4.4.4 A follow up on the student's condition/ time away from placement, if any, must be sent by the Program Chair or the Program Chair's designate to the Manager Health, Safety and Wellness via email within three days of the injury as often this information is requested by WSIB. A copy of the Incident Report Form will be forwarded to the appropriate Campus Nurse. A determination will be made whether or not follow up is required based on the injury.
- 4.4.5 If a Learner, because of the accident/injury, is not able to attend placement or seeks medical treatment after the initial report of accident/injury, the Learner must advise their Placement Coordinator, who in turn will advise the Manager, Health, Safety and Wellness. Additional WSIB or Chubb Insurance forms may be required.
- 4.4.6 The original Incident Investigation Report and associated forms will be maintained by the Manager, Health, Safety and Wellness.
- 4.4.7 Refer to the specific Placement Injury Reporting instructions and applicable Forms contained on the College intranet site at: <https://intranet.stclaircollege.ca/HS/>.

5. Mandatory Medical Requirements Prior to Placement

- 5.1** In accordance with Communicable Disease Surveillance Protocols for Ontario and other provincial regulations, students in Health Sciences, Food Handling, and Childhood Education programs must meet particular health requirements in order to participate in the clinical/field placement component of their Programs.
- 5.2 Communication of Mandatory Medical Requirements, Instructions and Timelines**
- 5.2.1 The Registrar's Office will communicate to all students who have been accepted into programs that include a clinical/placement, the medical requirements. Ontario regulations and St. Clair College policy require health screening for all persons entering certain clinical/field placement settings.

Medical Requirements Forms are noted in the letter from the Registrar's Office, together with directions for completing and timelines for completion. If, due to timing of a placement, a medical clearance is not required at the onset of the program, the Program Chair will communicate the specific requirements and timing around obtaining the medical clearance to students.

- 5.2.2 Each Program Coordinator must forward to their Chair the requirements around Medical Clearances specific to the program and/or placement location. Prior to each semester, the Program Chair, or designate, will update the mandatory medical requirements in the PeopleSoft Student Information System as well as ensure that the College webpage for Police/Medical Clearance Information and Clinical Placement Requirements is updated accordingly. IT staff will update the Police/Medical Clearance Information webpage and Clinical Placement Requirements webpages based on information provided by the Program Chair or designate.

5.3 Passport to Health

- 5.3.1 Program Chairs, or their designates, must ensure that all Clinical Faculty obtain proof of issuance of the 'Passport to Health' before allowing students to go to clinical placement.
- 5.3.2 Students are responsible for arranging to have all requirements met and all medical forms completed prior to the start of clinical/placement. This can be done by making appointments with doctors or with the College's Health Centre. This process can take up to two months as blood work and follow ups are required.
- 5.3.3 Students must submit completed forms to the St. Clair College Health Centre for review and to obtain their 'Passport to Health'.
- 5.3.4 Health Centre staff will review all medical forms and validate all requirements have been met. If the forms are complete, the 'Passport to Health' will be issued. No temporary passports will be issued.

5.4 Passport to Health Tracking

- 5.4.1 The St. Clair College Health Centre uploads the 'Passport to Health' information for each student once completed into the PeopleSoft Student Information System (SIS). Program Coordinators and/or Clinical Faculty have access to the PeopleSoft SIS to confirm that their student has obtained their Passport to Health. Placement Agency personnel (if requested) may receive a copy of the student's Passport to Health. Health forms are confidential and need not be presented to Faculty. They must, however, be presented to the Health Centre.

6. Mandatory Non-Medical Requirements Prior to Placement

- 6.1 **Obtaining a Police Clearance** - Many placement employers who provide our field placement/clinical settings require a clear police record check for criminal offences with vulnerable sector screening before accepting a student into the field placement/clinical setting. The police record check must be obtained by the student at the student's expense.
- 6.2 **Standard First Aid/CPR** – Many clinical/placement settings require that students are certified in Standard First Aid and CPR. Depending on the program/clinical/placement, different levels of CPR are required. Student must take requisite courses to obtain the required certification and at the student's own expense.

- 6.3 N95 Mask Fit** – Students in healthcare programs/clinicals/placements require respirator use and proper fit is mandatory. These students are required to be N95 mask FIT tested and the testing is to be arranged by the student and completed prior to the start of clinical/placement at the student's own expense.
- 6.4 Working at Heights** – Students working on construction sites are required to have Working at Heights training. Working at Heights training must be completed prior to the start of placement.
- 6.5 Communication of Mandatory Non-Medical Requirements, Instructions and Timelines**
- 6.5.1 The Registrar's Office will communicate to all students who have been accepted into programs that include a placement, the mandatory non-medical requirements, together with instructions and timelines for completion. If, due to timing of a placement, a mandatory non-medical requirement is not required at the onset of the Program, the Program Chair, or designate, will communicate the specific requirements and timing around obtaining the non-medical requirements to students.
- 6.5.2 Each Program Coordinator must forward to their respective Chair, the non-medical requirements specific to the program and/or placement location (e.g. police clearance, vulnerable sector screening, standard first aid, CPR (including required level), N95 mask fit testing; and working at heights, as applicable). Prior to each semester, the Program Chair, or designate, will update the mandatory non-medical requirements in the PeopleSoft Student Information System as well as ensure that the College webpage for Police/Medical Clearance Information and Clinical Placement Requirements is updated accordingly. IT staff will update the Police/Medical Clearance Information webpage and Clinical Placement Requirements webpages based on information provided by the Program Chair.
- 6.6** The student is responsible for contacting the police department in their city of permanent residence to inquire about the process to obtain a police clearance. If a police clearance letter is required in order to obtain the police clearance, the student will follow the instructions contained on the College website to obtain one. Refer to the specific **Police Clearance procedure**, applicable Programs and forms contained on the College website at: <https://www.stclaircollege.ca/programs/police-clearances>.
- 6.7 Non-Medical Requirements Tracking**
- 6.7.1 Students upload required non-medical placement requirements to the PeopleSoft Student Information System. The Registrar's Office reviews student submissions for compliance against program placement requirements and confirms in PeopleSoft. Program Coordinators and/or Clinical Faculty have access to the PeopleSoft SIS to confirm that their student has obtained the requisite non-medical placement requirements prior to starting a clinical/placement.
- 6.8 Accommodation Plans**
- 6.8.1 The student is responsible to meet with a counsellor in Accessibility Services to discuss their functional limitations and accommodation needs for field placement. The student shall provide supporting documentation (*i.e.* Functional Limitations Form/medical form) and include a copy of the learning outcomes for the placement course. Students are encouraged to meet with a counsellor prior to the start of a placement to provide information and arrange accommodations. Early Disclosure allows for pre-placement planning that enables the student, counsellor, and Placement Coordinator to plan while considering accessibility needs.

The Placement Coordinator shall collaborate with Accessibility Services to assist in finding a placement agency for the student that is able to accommodate the student's accessibility needs. A Placement Accommodation Plan shall be developed, and with the consent of the student, a copy of the Placement Accommodation Plan shall be sent to the field placement on-site supervisor. Accessibility Services, Placement Coordinator, the student, and the Field Placement on-site Supervisor shall collaborate to support inclusion and full participation. See St. Clair College Policy No. 7.4 for process.

7. MCU Reporting

- 7.1. At the end of each semester, MCU requires statistics for those students placed in unpaid work placements that are not covered by WSIB.
 - 7.1.1. The Manager, Health, Safety and Wellness will request of each Placement Coordinator the number of students on placement and the number of hours on placement for each placement agency not covered by WSIB.
 - 7.1.2. If international students (on Visa Study authorization and appropriate Work Permits) are on unpaid work placement, their placement hours must be reported separately to MCU. MCU provides insurance coverage for international students who are Learners at Ontario Colleges or Universities.
 - 7.1.3. Placement Coordinators must complete the required form for their program(s) and send the completed forms to the Manager, Health, Safety and Wellness. This will be requested three times each year.
 - 7.1.4. The placement statistics will be collated and reported to MCU by the Manager, Health, Safety and Wellness.

8. References:

Workplace Safety & Insurance Act
Ministry of Colleges & Universities Act
Occupational Health & Safety Act