

# **LUNEX Internships Policy**

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**Approved**

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## Purpose

To ensure that internships at LUNEX are organised in a safe, fair and transparent manner as well as ensuring the quality of the internship learning.

The LUNEX's approach is informed by practice at a number of European Higher Education Institutions and by legal provisions set by Luxembourg Labor Code. Moreover, programme-level procedures are informed, whenever applicable, by relevant good practices published by Luxembourgish and/or international organisations (e.g. World Physiotherapy Physiotherapist Education Framework).

The Policy sets out the Institution's principles for internship learning, the most important of which is that the Institution has ultimate responsibility for the academic standards of its awards and for the quality of learning opportunities provided to its students even when they are out on internship and subject to the immediate supervision and oversight of the internship provider.

The Policy specifies the requirements for the approval of internship providers and of specific internship activities. Both will be considered through a risk assessment process which enables the Institution to focus its concerns on higher risk providers/activities, and therefore to make sure that the internship opportunity is suitable for students in terms of giving them a fair chance to meet the learning outcomes for the module as well as being a safe experience.

LUNEX, through the Internship Officer of relevant study programmes, will maintain a database of approved Internship Providers at each Academic Department level.

The allocation of internships will be determined according to the individual programme and must be published in the approved programme specification. Allocation will also be subject to overriding principles including ensuring that any process of allocation is made known to students and ensuring that students know what support will be offered to them in the allocation process.

Every internship must be recorded in a written internship agreement, signed by the internship provider, LUNEX and the student, setting out the rights and responsibilities of each party. This agreement includes expectations of the student in terms of their conduct on the internship, and the support to be provided by LUNEX and the internship provider. During the internship students remain bound by their obligations to LUNEX and also entitled to access to LUNEX facilities as well as retaining their rights to use the appeals or complaints procedures. Students will be invited after the internship to provide feedback about the experience of the internship itself and how it has helped prepare them to meet the learning outcomes of the module.

All assessment of a student's internship activity, whether relating to learning or conduct on the internship or tasks completed following the internship must be clearly set out in the module descriptor and be provided to students before the internship. Where the internship provider is to be involved in the assessment process they must be provided with appropriate training and their judgements subject to moderation in accordance with LUNEX's requirements set out in the Assessment Regulations. The consequences of a

premature termination of an internship, occurring for whatever reason, must be identified and appropriate action taken with the student properly informed of the actions to be taken, the reasons for those actions and their rights, including the right to appeal.

## Scope

This Policy sets out LUNEX's approach to, and requirements for, internship learning where an internship is an integral part of a programme leading to one of the LUNEX's higher education qualifications. Integral means that the internship, or learning derived from it, is summatively assessed and contributes to the achievement of the learning outcomes for the programme

This Policy applies to internships which are provided as part of a LUNEX accredited programme.

Such internships must be integral to the programme, in that they are summatively assessed and thereby contribute to the achievement of the programme learning outcomes and are designed to lead to the award of credit within the programme. Internships are specifically those learning activities which take place in a situation provided by an organisation external to LUNEX, whether an employer, charity or another education provider.

Internships therefore include periods of study at another institution (such as a practice placement or a semester or year abroad), and include internships which are designed to enable students to acquire and demonstrate the competences of professional practise required as part of a programme to meet professional requirements (such as Physiotherapy, Dietetics). In this context, a condition to recognise the internship activity at LUNEX is that the student engage in the internship activity free of charge, that is with no remuneration received from the internship provider.

In all forms of internship, the immediate responsibility for the supervision and oversight of the student is transferred from LUNEX to the Internship Provider, while the student remains an enrolled student of LUNEX and is subject to the codes of conduct and procedures of the Internship Provider and of LUNEX .

This policy does not apply to activities which might contribute to a student's employability development but which are not an integral part of the programme, such as:

- a) students who use their work experience to inform their programme
- b) part-time or vacation work which students have arranged for themselves and is not required by the programme
- c) field trips, educational visits and short periods of data collection outside LUNEX for research purposes
- d) students who interrupt their studies for a period of time (such as a semester off) to gain work experience or volunteering and for which any learning is not credited as part of the programme and during which period the student is not enrolled with the Institution but is permitted to resume their studies at the agreed end date of the interruption period.

## Policy Statement

LUNEX Internship Policy complies with the Luxembourg Labour Code provisions in terms of “stage the formation”, as well as specific regulations of LUNEX.

LUNEX aims at offering internships leading students to equal learning experiences that serve the intended exit level of relevant academic programmes.

LUNEX aims at guarantee equal treatment for all students taking up internships, whether in Luxembourg or abroad.

## Roles & Responsibilities

The Board of Directors shall ensure compliance with the regulations in force.

The Quality Assurance Manager shall ensure compliance with and monitor the quality management system and drive the process for continuous improvement.

The relevant Heads of Department shall monitor that their direct reports comply with this policy and for the approval of the Internship Providers with and “Mid” and “High” risk profile

The Head of Administration is responsible, in conjunction with the relevant Head of the Department for the approval of the Internship Providers with a “High” risk profile

The Councils, their chairs, and committees are responsible for cross department quality in their respective attributions.

The Programme Leaders are responsible for the implementation of this policy in the relevant programmes.

The Module Coordinators are responsible for the implementation of this policy in the relevant modules.

The Internship Officers are responsible for the implementation of the policy prescriptions withing the relevant programme(s).

## Definitions

**Host Internship Coordinator**, staff member at the Internship Provider responsible for the allocation of students to a suitable Internship Mentor(s). Accepted synonyms: Clinical Educator Coordinator, an accepted alternative term used in the context of LUNEX programmes leading to the achievement of entry level qualification for a regulated healthcare profession.

**Internship**, a structured educational experience that provides students with the opportunity to integrate academic knowledge and theory with practical work experience in a professional setting related to their field of study. Internships are an integral part of a programme leading to one of the LUNEX’s higher education qualifications. Accepted synonyms: Practice Placement, an accepted alternative term used in the context of

LUNEX programmes leading to the achievement of entry level qualification for a regulated healthcare profession.

**Internship activities**, specific tasks, projects, responsibilities, and learning experiences that interns engage in during their internship. These activities are designed to provide interns with practical, hands-on experience in their chosen field of study and to help them develop relevant skills and knowledge.

**Internship Mentor**, experienced professional in the intern's chosen field working at the Internship Provider. They supervise the student intern and provide guidance, support, and professional networking opportunities to the student as they engage in their internship role. Accepted synonyms: Clinical Educator, an accepted alternative term used in the context of LUNEX programmes leading to the achievement of entry level qualification for a regulated healthcare profession.

**Internship Officer**, LUNEX staff member delegated to the organization and oversight of internships for a relevant accredited programme.

**Internship Provider**, an organization or entity that offers internships to students seeking practical work experience in a specific field or industry. Internship providers can include a wide range of organizations such as businesses, hospitals, non-profit organizations, government agencies, educational institutions, research institutions, and community organizations. Accepted synonyms: Host Organisation

## Related legislation & documents

- Code du Travail <https://legilux.public.lu/eli/etat/leg/code/travail/20240227>
- ASET Good Practice Guide for Managing the Health, Safety and Welfare for Student Placements 2021, <https://www.asetonline.org/wp-content/uploads/2023/04/Good-Practice-Guide-for-Managing-Health-Safety-and-Welfare-for-Student-Placements.pdf>
- World Physiotherapy. Physiotherapist education framework. London, UK: World Physiotherapy; 2021.
- LUNEX Assessment Regulation
- LUNEX Regulations for the Assessment and Learning of Students with Disabilities.

## Principles

- 1 Any internship provision to which this Policy applies is subject to the following principles:
  - (a) LUNEX has ultimate responsibility for the academic standards of the award and for the quality of the learning opportunities provided during an internship. LUNEX responsibility extends to the provision of an adequate number of internship opportunities for students. Internships are therefore subject to the rules governing progression and the assurance and enhancement of quality set out in the LUNEX Assessment Regulations and supporting Codes.

- (b) the programme specifications and module descriptors and any related programme information (such as a prospectus, web-based advertising, programme/module handbooks) **must** make clear that the internship learning is an integral part of a programme, whether it is compulsory or optional, demonstrate how it contributes to the intended learning outcomes for the programme, and how it will be assessed
- (c) any additional costs which will be incurred by a student undertaking an internship must have been made known to the student
- (d) any responsibility on a student to find their own internship **must** have been made known to the student
- (e) all placements and internship providers **must** be subject to a robust and proportionate risk assessment carried out by suitably qualified or experienced LUNEX staff, which ensures that the internship will provide an effective learning opportunity, a safe working environment and can deliver any individual needs of the student set out following the provisions of the Assessment and Learning Regulations for Students with Disabilities.
- (f) the rights and responsibilities of the internship provider, LUNEX and the student must be clearly agreed, documented and be provided to each party prior to the commencement of the internship by an internship contract
- (g) the attendance requirements of the internship (days, working hours, time off entitlement) must be made clear to the student in writing in advance of the internship commencing, along with any consequences of failing to comply with the attendance requirements
- (h) the arrangements for supporting students on internship must be clear, including the extent to which LUNEX staff will visit the student at the internship site or interact remotely with the student (such as in tutorial meetings)
- (i) where an Internship Provider is to be involved in any form of summative assessment relating to the internship, that Internship Provider must receive, prior to undertaking any assessment, appropriate training on LUNEX requirements, including an understanding of the learning outcomes and grading criteria, and all such assessment must be marked and moderated in accordance with LUNEX Assessment Regulations and supporting Codes.
- (j) the consequences for the student must be made clear in advance in the event that the:
  - (i) inability to secure a suitable internship
  - (ii) student fails part or all of the internship module
  - (iii) student is unable to complete the internship for health or exceptional personal reasons
  - (iv) Internship Provider is unwilling to allow the internship to continue, for example due to the conduct of the student falling below that required by a code of conduct, including where the student's conduct has placed their own or other's health or safety at risk
  - (v) Internship Provider is unable to deliver the full internship for example due to industrial action, liquidation or as a consequence of the requirements of a regulatory body.

## Approval of the internship providers

### Risk assessment

- 2 The overriding priorities in determining whether an internship with a specific Internship Provider can be approved by LUNEX are, ensuring:
  - (a) the integrity of the academic standards of LUNEX's awards
  - (b) the health, safety and well-being of the student and of those with whom the student will come into contact on the internship
  - (c) that, where applicable, the requirements of any professional, statutory or regulatory body can be met.
- 3 To achieve the above LUNEX applies a risk management approach which also enables it to take a proportionate approach to each potential internship, makes the best use of LUNEX's resources, and minimises the burden on internship providers. This approach is also under-pinned by ensuring that all parties involved in internships (Internship Providers, LUNEX staff and students) have a clear and shared understanding of their roles, rights and responsibilities in relation to all aspects of the internship and how it relates to LUNEX programmes.
- 4 LUNEX's approach is based on the six health and safety risk factors set out in the ASET Good Practice Guide for Managing the Health, Safety and Welfare for Student Placements (2021, <https://www.asetonline.org/wp-content/uploads/2023/04/Good-Practice-Guide-for-Managing-Health-Safety-and-Welfare-for-Student-Placements.pdf>):
  - (a) Work
  - (b) travel and transportation
  - (c) location and/or region
  - (d) general/environmental
  - (e) individual student
  - (f) insurance limitations
- 5 Programme Leaders, or their delegates acting as Internship Officers, are responsible for undertaking a risk profile, typically including identifying whether, for each factor, the risk is 'high', 'medium' or 'low' and for identifying appropriate control measures.

### Approval of the placement provider and placement activity

- 6 Approval of internships should be considered as involving two stages:
  - (a) approval of the Internship Provider
  - (b) approval of the specific internship activity at that Provider.

### Approval of placement providers

- 7 Approval of the Internship Provider is required to ensure the suitability of the location, premises and nature of the business of the Provider. Each Department of LUNEX will maintain a database of its approved Internship Providers so that

once a Provider has been approved that approval will be valid for future placements subject only to:

- (a) there being no significant changes in the circumstances of the Provider (e.g. change in the nature of the business, change in management or change in/addition of a new location)
  - (b) the ongoing evaluation of the Provider's suitability, for example based on feedback from students and from staff involved in visiting and supporting students placed at the Provider.
- 8 Where, for whatever reason, an Internship Provider has not hosted an internship in the preceding three years, the risk assessment for the Internship Provider should be revisited to ensure it is still a valid assessment.

### Approval of specific placement activities

- 9 Approval of the internship activity is a separate judgement from approval of the Provider given the need to ensure that the learning experience which the student will gain is suitable for that individual student (including taking account of any reasonable adjustments) and will give the student a fair opportunity to meet the learning outcomes applicable to the internship.
- 10 Where the Internship Provider has previously been approved and that approval remains valid a separate risk assessment of the internship activity must be undertaken only to the extent that any of the six risk factors are judged to be of higher risk for the internship activity or the individual student compared with the risk assessment conducted for the approval of the Internship Provider. An internship which will involve a student who is under 18 at the start of the internship must be considered at least 'medium' risk and the Internship provider consulted as to whether such a student can be accommodated.

### Internship in other countries

- 11 Where the proposed Internship Provider is based outside of Luxembourg/EU the risk assessment process **must** pay attention to the implications of this, paying particular attention to:
- (a) the arrangements to ensure health and safety at the Provider (including where the country's health and safety laws are not comparable with those of Luxembourg/EU)
  - (b) the first language of the country is not English – either documentation must be translated into English or LUNEX staff must be fluent in the language in question or have access to sufficient translation facilities.
- 12 Whenever students are being allocated to an internship staff **must** ensure that students:
- (a) have sufficient oral and written competence in the language of the country to be visited to ensure that they can benefit from the experience
  - (b) are made aware that they will be subject to the laws and customs of the providing country

- (c) are advised about practical matters such as immigration and insurance and seeking appropriate advice about compulsory and recommended preventative health measures, including vaccination requirements.

### Responsibility for approval

- 13 The approval of Internship Providers is the responsibility of:
  - (a) the Internship Officer of the interested study programme for providers judged to be ‘low’ risk
  - (b) the relevant Head of Department and Internship Officer for providers judged to be at ‘medium’ risk.
  - (c) the relevant Head of Department and the Head of Administration for providers judged to be at ‘High’ risk.
- 14 The approval of placement activities is the responsibility of:
  - (a) the relevant Internship Officer on behalf of the relevant Programme Leader for internships where the internship activities risk level does not differ from the risk level profile defined during the Internship Provider approval process;
  - (b) the relevant Head of Department and Head of Administration for internships where any of the six risk factors are judged to be of higher risk for the internship activity or the individual student compared with the risk assessment conducted for the approval of the Internship Provider.
- 15 Approval of Internship Providers or internship activities designated as ‘medium’ or ‘high’ risk will only be considered where there are judged to be appropriate control measures identified and able to be put in place. It should be noted that appropriate control measures for certain risks classified as “medium” and “high” are included by design in certain accredited programmes. As an example, programmes granting access to healthcare regulated professions provide graduates with specific knowledge, skills and aptitudes to engage in internships in settings/environments usually classified as “high risk” (e.g. medical).

### Allocation of internships

- 16 The responsibilities for applying for/allocating internships must be explicit and made known to students sufficiently in advance to ensure that appropriate arrangements can be made. Specifically, if students are:
  - (a) responsible for finding their own internship this **must** have been notified in advance to ensure that appropriate arrangements can be made
  - (b) required to apply for an internship from a list of available internships, the process for applying, and the criteria for judging each student’s suitability, **must** be notified to students in advance of the process commencing
  - (c) to be allocated places by LUNEX staff (whether in consultation with Internship Providers or not) this **must** be made known in advance, including whether and to what extent this is based on student preference or other criteria.
- 17 The process of allocating internships **must** be set out in the programme specification and must ensure equality of opportunity for all students on the programme.

- 18 Where students are expected to apply for the internship, including for example attending an interview with the Internship Provider, the relevant Internship Officer(s) on behalf of the relevant Programme Leader should advise students on the preparation and support that will be offered in advance – for example on CV writing, interview technique (including mock interviews or training sessions), or skills testing. The needs of students with special needs, are address in the Regulations for the Assessment and Learning of Students with Disabilities.

## Internship agreements

- 19 To ensure that the rights and responsibilities of all parties to an internship (Provider, student and LUNEX staff) are clear about their rights and responsibilities in respect of the internship, an internship agreement **must** be signed by all three parties before the commencement of the internship. Such agreement **may** make appropriate reference to supporting documents (such as a [LUNEX] internship handbook, Internship Provider handbook or similar where applicable).
- 20 Where a student will be under the age of 18 at the start of the internship, the student’s guardian **must** be informed of the proposed internship, the information detailed below and be asked to counter-sign the internship agreement.
- 21 Prior to the three parties signing the agreement the following **must** be clear to the parties:

### *To be provided by the LUNEX Programme Leader or Internship Officer*

- (a) the intended learning outcomes for the internship
- (b) the Internship Provider role in the assessment process (if any) including any report or feedback which the Provider is required to give and the evaluation/grading criteria for such feedback
- (c) arrangements for providing training for any member of the internship provider’s staff who will carry out assessment
- (d) any reasonable adjustments required to support the student, as set out following the provision of the Regulations for the Assessment and Learning of Students with Disabilities, revised as necessary to reflect the internship. Internship Providers **should** be reminded that the responsibility to provide reasonable adjustments in the internship lies with them.

### *To be provided by the Internship Provider*

- (e) any code or equivalent document setting out the standards of conduct expected of employees and other users of the site where the internship will take place
- (f) any guidance relating to how to ensure health and safety, and any specific health and safety rules (including protective clothing/equipment) and whether this is the responsibility of the provider or the student
- (g) guidance on general behaviour and respecting cultural or religious norms (for example how to address colleagues, use of social media).

## *To be provided by the student*

- (h) any individual support needs where these have not already been considered prior to allocating the placement or were not anticipated prior to the internship being allocated.
- 22 The internship agreement **must** confirm:
- (a) which member of the Internship Provider's staff – by name and role – is the Primary Contact for Students; that is, the primary reference for the student to approach to receive guidance (such as induction on their first day at the workplace)
  - (b) which member (or member(s)) of the Internship Provider's staff – by name and role – is the primary contact for the LUNEX Internship Officer(s) and staff
  - (c) which member (or member(s)) of the Internship Provider's staff – by name and role – are the acting Host Internship Coordinator (HIC), responsible for the allocation of a student to a suitable Internship Mentor(s) (IM). In smaller organisations the IM and the HIC may be the same person.
  - (d) programme-specific suitability criteria for the HIC and IM(s)
  - (e) the duration of the internship including agreed working days and hours (whether fixed or flexitime)
  - (f) that the site on which the internship will take place is a safe environment which at least complies with health and safety legislation
  - (g) ownership of the Intellectual Property Rights (IPR) of work undertaken whilst on internship (if applicable)
  - (h) any specific responsibilities of each of the parties
  - (i) the duty of all parties to notify the others of anything which they believe will jeopardise the success of the internship
  - (j) the conditions that may lead to a premature termination of the internship
  - (k) whether the Internship Provider will be willing to provide the student with a reference following the internship.
- 23 Where considered necessary by the Internship Provider, the student **must** sign, and thereafter comply with, a confidentiality agreement. A copy of any signed agreement must be provided to the student and the Internship Officer.
- 24 Students **must** be reminded that while they are on internship they are still enrolled students of LUNEX and therefore representatives of the Institution. They must therefore behave in a professional and responsible manner and continue to be bound by the conditions of enrolment (e.g. LUNEX Code of Conduct) including to notify the Institution of any change in circumstances relating to their eligibility to be a student or (if applicable) relating to their ongoing support needs.

## **Support for students on internship**

### **Prior to going on internship**

- 25 Prior to going out on internship, all students **must** be fully briefed on their rights and responsibilities. This information **must** be included in a Handbook(s) or equivalent and cover the following:

## *Programme specific information*

- (a) learning outcomes of the internship
- (b) the learning objectives, applicable progress reports/milestones and assessment
- (c) the consequences of not completing the internship
- (d) any language or skills preparation available to them
- (e) LUNEX support services and how to access them while on internship

## *Generic information*

- (f) any LUNEX Code of Conduct for Students undertaking a internship
- (g) the student's rights and responsibilities whilst on internship including their responsibility to seek out appropriate learning opportunities, to maintain contact with the relevant Internship Mentor(s), and to agree learning objectives with their Internship Mentor (if applicable)
- (h) cultural orientation and work expectations
- (i) health and safety information and risks relevant to particular countries
- (j) any occupational health considerations
- (k) advice on practical considerations such as travel and finding accommodation (where applicable)
- (l) any legal or ethical considerations (e.g. client confidentiality)
- (m) the need for personal insurance cover
- (n) developing professional skills, such as developing their professional network.

- 26 Relevant Programme Leaders or the Internship Officer(s) **should** consider, where possible, linking up students who have been on internships with those about to go on internships at the same Internship Provider so that experiences can be shared.

## **Support while on internship**

- 27 Students **should** be supported throughout their internship and appropriate steps should be taken to ensure that:
- (a) the student is meeting their personal learning objectives
  - (b) the student is satisfied with their internship and receiving adequate supervision
  - (c) sufficient progress is being made for the student to meet the learning outcomes of the internship
  - (d) adequate health and safety measures are in place
  - (e) where applicable reasonable adjustments are being provided as agreed.

## **Returning from internship**

- 28 Appropriate arrangements **should** be in place to re-orientate the student to LUNEX campus life taking into account the length and location of the internship.

## **Feedback from the student on the internship experience**

- 29 Feedback **should** be sought from all students following the completion of their internship regarding their experience on the internship. This feedback **should** relate to:

- (a) the experience of the specific internship – in particular to provide assurance or otherwise that the Internship Provider and internship activity are fit-for-purpose
  - (b) the experience more generally – to assist in evaluating the effectiveness of the internship as an element of the programme and its ability to help students meet the learning outcomes for the module and programme.
- 30 Consideration **should** be given to the best time to collect feedback (including whether to collect it in stages) so that the experience is still fresh in the students' minds but not too early that they have not completed the assessment and therefore cannot evaluate how well it prepared them for the assessment tasks.

## Appeals and complaints

- 31 Students **should** be reminded that while on internship they remain entitled to use the LUNEX appeals and complaints procedures where the matter is not something which can be resolved directly with the Internship Provider.

## Assessment

- 32 The assessment of any module involving an internship **must** be conducted in accordance with LUNEX Assessment Regulations and the specific module outlines where the internship is located.
- 33 Any assessment involving the judgement of a Internship Provider **must** be moderated by the relevant module coordinator. The marking criteria to be used by the Provider and any other guidance must be available to the provider and the student in advance of the internship and be applied in assessing the work.
- 34 The student **must** be provided with written feedback on the Internship Provider's assessment of their performance, including how their performance could be improved on future internships or when entering employment post-completion.

## Premature termination of the internship

- 35 Where a internship is prematurely terminated by the Internship Provider and is not the result of any misconduct on the part of the student, the relevant Internship Officer(s) **must** make appropriate arrangements to ensure that the student can be provided with an alternative internship experience and will have an equal and fair chance to achieve the module learning outcomes.
- 36 Where the internship had nearly been completed, the relevant Internship Officer(s), in consultation with the student, may determine that the student still has an equal and fair chance to achieve the module learning outcomes and therefore no further action is required.
- 37 Where the premature termination of the internship is caused by the student (including through conduct falling below that expected of a student on internship or conduct putting themselves or others at risk) the Internships Officer(s) **must** determine, in consultation with the Exam Board where appropriate (e.g. academic misconduct), and after interviewing the student and consulting with the Internship Provider, what action to take. This should include considering whether an

alternative internship should be offered (with or without an interruption of studies first), or whether action should be taken against the student under the relevant academic regulations (i.e. LUNEX Code of Conduct) such as exclusion from the assessment for the module. Whichever actions are to be taken, the student must be informed of the actions, the reasons for them, their consequences and any right to a hearing or interview and/or to appeal.

## Reassessment

- 38 Where the student fails a module which includes, or is based on, a internship, the arrangements for reassessment **must** have been made clear in advance of the internship. This **must** include whether new work is required based on the completed internship or another arrangement which is valid and reliable and gives the student a fair opportunity to demonstrate achievement of the learning outcomes.

## Record of internship providers

- 39 The relevant Internship Officer(s), on behalf of the relevant Programme Leader is responsible for maintaining a database of Internship Providers for the programme, including adding new Providers once they are approved in accordance with this Policy and removing those who are subsequently deemed unsuitable or who indicate that they are no longer able to provide internships. The suitability of internships must be monitored by the Relevant Internships Officer in conjunction with the relevant Programme Leader, taking into account feedback from students and from Internship Providers, as part of the monitoring and review of the programme and its constituent modules.