

Process Document for Student Unpaid Placements

Human Resources
Health, Safety & Well-being
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Your Well-being.

Created: February 2021
Revised: January 2025

Definitions

Training Agency: a postsecondary educational institution. Western University is an approved Training Agency. For the purpose of Student Unpaid Placements and this process document, the Placement Coordinator is the representative of the Training Agency.

Placement Employer: the employer with whom the Student Trainee is placed by a Training Agency to receive training as part of the requirements of his/her Approved Program.

Student Trainee: a student engaged in an Unpaid Work Placement with a Placement Employer.

Unpaid Work Placement: an unpaid work placement that is required as part of an Approved Program offered by a Training Agency – students receiving social assistance benefits, training allowance, honorarium, reimbursement of expenses, and stipend paid to the Trainee are still considered on an unpaid placement.

Chubb Insurance of Canada: Chubb Insurance is a private insurance company retained by the Government of Ontario, previously this coverage was provided by ACE-INA.

CURIE/Mercer: the private insurance company retained by the University for students that do not meet Ministry criteria.

Eligibility for Ministry of Colleges and Universities (MCU) Coverage

Student trainees are eligible to receive MCU paid Workplace Safety and Insurance Act (WSIA) covered Benefits (WSIB) or Chubb coverage if the Placement meets the following criteria:

- The Placement is unpaid. Students are still eligible for coverage if they receive one or more of the following types of payment:
 - Social assistance benefits
 - Training Allowances
 - Honoraria
 - Reimbursement of expenses
 - Stipends of any money paid to the Student Trainee by the Training Agency
- The Placement, which may be **required or optional/elective**, is part of an Approved Program, includes a formal assessment component, and successful completion of the placement is recognized by the Training Agency for the purpose of the completion of the Approved Program.
- The Placement is authorized by the Training Agency.
- The Placement is a non-classroom activity. Any in-class portion of a training program that occurs at the Training Agency is not an Unpaid Work Placement.
- Student Trainees that attend an unpaid placement outside of Ontario, even if the employer is based in Ontario, will have limited coverage available through Chubb as this is outside the WSIA legislation. The Student Trainee is advised to obtain additional insurance.

Ineligibility for MCU Coverage

- Student Trainees who are paid a salary
- Student Trainees whose work placement is with Western University, including unpaid research
- Unpaid placements between institutions
- Student Trainees who are in the classroom portion of training program.
- International Student Trainees that are attending an unpaid placement in the country of their primary residence

MCU coverage applies to all students in an unpaid placement that meet the eligibility criteria outlined in this document. If the Placement Employer has WSIB coverage for their own employees, the Student Trainees will have WSIB coverage through MCU. Please see MCU WSIB Q&A for updates related to COVID-19.

If the Placement Employer does not have WSIB coverage for their own employees, the Student Trainees will have coverage under Chubb private insurance, still under MCU. Chubb insurance covers claims associated with accidents for students on unpaid placements including those working from home – coverage is available to those students who have been approved and are being supervised by the Placement Employer to work from home. Chubb coverages does not include claims resulting from any infectious disease, including COVID-19.

Confirmation of whether or not the Placement Employer has WSIB coverage will be available once the Placement Employer completes and returns the Letter to Placement Employers. This will be most relevant in the event of an incident and when MCU requests Chubb data reporting for each of the academic terms.

If the student placement meets the eligibility criteria for MCU coverage, please proceed to the next page, which will outline the responsibilities of the Training Agency and the Placement Employer, and will outline the steps to follow for students on unpaid work placements that are covered by MCU.

If the student placement does not meet the eligibility criteria for MCU coverage, please proceed to page 5 which will outline the private insurance policy for additional student unpaid placements. **Please do not use the MCU forms for these placements as they clearly state the student has coverage under MCU.**

MCU Process for Placement Coordinators at Western University

Placement Coordinators are required to ensure that the Placement Employer with which they are placing Student Trainees is aware of whether there is WSIB coverage for such student and is aware of relevant WSIB reporting procedures in the event of an injury/illness. This will be achieved by having the Placement Employer review, complete and return the **Letter to Placement Employers** prior to placement.

Ensure Student Trainees receive training in safe work practices. There are 2 checklists available to ensure that training in safe work practices is achieved: (1) **Pre Placement Field Trip due Diligence Checklist** needs to be completed by the Placement employer and returned to the Department prior to student placements and, (2) **Pre Placement Safety Orientation Checklist** needs to be completed and signed by the Placement employer and the Student Trainee prior to the student placement and returned to the Department.

Inform Student Trainees that if they are injured or contract an illness, the University will disclose personal information relating to the Unpaid work Placement and any WSIB claim to MCU. Advise Student Trainees that they are eligible to make a claim for WSIB Benefits in the event of injury/illness incurred while in an eligible Unpaid Work Placement. This can be achieved by having the Student Trainee review and sign the **Student Declaration of Understanding** prior to the start of the student placement.

Information flow must take place between the Placement Coordinator and the Placement Employer and include the following information prior to the Student Trainee's placement:

- Student Trainee's full name
- Specific days when the Student Trainee will be at the Placement Employer's worksite
- Confirmation from the Placement Coordinator of the Student Trainee acceptance of the conditions of the Unpaid Work Placement

For the purpose of determining insurance premiums, each year Training Agencies are required to file with MCU total hours of Unpaid Work Placement by Approved Program with Placement Employers not covered under WSIA, and the total number of Student Trainees involved. It is necessary to report the applicable industry where the Unpaid Work Placement occurs. MCU requires this information by semester and contacts the Training Agencies shortly after the end of each semester (January, May and September). Western's Health, Safety & Well-being Office will request this information from the Placement Coordinators, accordingly.

If a Student Trainee incurs an injury/illness while working in an Unpaid Placement with a Placement Employer

The Student Trainee and Placement Employer must complete and sign the **MCU Postsecondary Student Unpaid Work Placement Workplace Claim Form** and return it to the Training Agency's Placement Coordinator in order to initiate a WSIB claim.

Note: This Form must include the Student Trainee's signature indicating consent to the indirect collection of personal information by MCU or the signature of a parent or guardian is required to indicate consent if the Student Trainee is under 18 years of age.

The Placement Coordinator must obtain the **Western's Student Placement AIIR form**, the completed **MCU Postsecondary Student Unpaid Work Placement Workplace Claim Form** and the completed **Letter of Authorization to Represent Employer** from the Placement Employer and provide to Western University's Health, Safety & Well-being Office **within 3 days of incident**.

All parties need to comply with Freedom of Information and Protection of Privacy Act (FIPPA) and the Ontario Human Rights Code (OHRC).

Responsibilities of Placement Employer

- Required to report any injury/illness in compliance with WSIB Operating Policy Manual, 15-01-02.
- Any injury/illness (however minor), that a Student Trainee suffers in relation to an Unpaid Work Placement should be reported by the Student Trainee to the Placement Employer (Supervisor) and the Placement Coordinator at the Training Agency.
- Information **must include** when, where, and how the work-related injury/illness occurred.
- First Aid only does not need to be reported to WSIB, but must be recorded and kept by the Training Agency in the event a report is required in the future.
- **Within 3 days** of learning of an injury, the Placement Employer must complete an Incident Report and send to the Placement Coordinator at the Training Agency.
- The Placement Employer must authorize the Training Agency to act as the representative with WSIB for the claim being submitted. A **Letter of Authorization to Represent the Placement Employer** must be completed and must accompany the Incident Report.

Contact Information for Claim Reporting

Tammy Johnston
Health, Safety & Well-being Coordinator
Western University
Email: tammy.johnston@uwo.ca
Phone: 519 661 2111; extension 86814

Eligibility for Private Insurance with Western University for Students not covered under MCU

- All active, Student Training Participants and Co-op students, under age 70
- While an Insured Person is taking part in a work placement program on the premises of the university at which the Insured Person is a Training Participant during the time the Insured Person is required to be therein or thereon by reason of attendance at such work placement
- While in attendance at or participating in any work placement activity and **is approved and supervised by the University** but is not funded through any Ontario government ministry operating grant

Limitations of Private Insurance with Western University for Students not covered under MCU

- **Coverage is not available for student absences related to COVID-19 as this is an exclusion under this policy.**
- Coverage is not provided for International students who are on a work placement outside of Canada, and such work placement occurs in the student's Home Country.
- Coverage is provided for International students who are on a work placement outside of Canada, and such work placements occurs in another country other than the student's Home Country. In the event of a claim, the International student must return to Canada to receive any benefits. Home Country means the country where the International student permanently resides.

Process for Placement Coordinators at Western University for Students Not Covered Under MCU

Placement Coordinators are required to ensure that Health, Safety & Well-being is notified of all students that require private insurance coverage through Western University, for coverage to apply. This includes all students that meet the criteria listed above under, "[Eligibility for Private Insurance with Western University for Students not covered under MCU.](#)"



The information required includes the: **Academic Department, course name and course code, student name and Western ID number in each course that will require coverage.** If the **Placement Employer** is known, this information should be included as well. Please note that this policy is renewed annually. All students involved in unpaid placements that meet the criteria for private coverage under Western, need to report the information to Health, Safety & Well-being **prior to the placement start date**, for coverage to apply.

If a Student incurs an injury/illness while working in an Unpaid Placement with a Placement Employer

The Placement Coordinator must obtain the **Western's Student Placement AIR form** from the Placement Employer and provide to Western's Health, Safety & Well-being Office within **3 days of the incident**.

Contact Information

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