

## **Insurance Guidelines for Coordinators of Student Field Placements**

## Definitions

**Approved Program:** a postsecondary program offered by a Training Agency that is funded through the Ministry's operating grant.

**Benefits:** workplace safety and insurance benefits that are provided under the *Workplace Safety and Insurance Act* (WSIA), including health care, early and safe return to work, work re-integration, loss of earnings benefits, loss of retirement income benefits, non-economic loss benefits and survivor benefits, and, where the case so requires, the analogous benefits provided under the predecessor legislation, the *Workers' Compensation Act*.

**Chubb Insurance of Canada:** Chubb Insurance is a private insurance company retained by the Government of Ontario.

**Eligible claim:** a claim to the WSIB for benefits made by a Student Trainee or by the survivors of a Student Trainee for an accident arising out of or in the course of the Student Trainee's participation in an Unpaid Work Placement with a Placement Employer.

**Ministry:** the Ministry of Advanced Education and Skills Development (MAESD).

**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 or her Approved Program.

**Student:** A postsecondary student enrolled in an Approved Program at a Training Agency as identified in Appendix A.

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

**Training Agency:** a postsecondary educational institution identified in Appendix A.

**Unpaid Work Placement:** an Unpaid Work Placement that is part of a Ministry Approved Program offered by a Training Agency.

**WSIA:** *Workplace Safety and Insurance Act, 1997*.

**WSIB:** Workplace Safety and Insurance Board.

## **Insurance Guidelines for Students on Field Placements**

### **Introduction**

This document is intended for use as reference material when dealing with placement hosts and as a guideline in establishing placements. Several specific documents must be completed in order to ensure the protection of students, placement hosts and the College with respect to compensation for work related injuries and liability.

Students who undertake field placements with employers as part of their program of study at the College are insured against workplace injuries during the placement through either the Workplace Safety and Insurance Board of Ontario (WSIB) or CHUBB Insurance (*formally known as ACE INA*). Although arranging field placements is a common process from the College perspective, it raises complex legal issues and often, questions by prospective placement hosts.

All employers in Ontario are not necessarily covered by WSIB. The first section of this document pertains to those employers who are covered by WSIB.

The second section of this document relates to employers who are not covered by WSIB. This includes:

- Ontario employers who are not covered by WSIB
- Out of province employers who are not part of the Ontario WSIB system
- Out of country employers who are not part of the Ontario WSIB system

The following step-by-step instructions have been developed to assist staff coordinating field placements in completing the required documentation.

### **Eligibility for Ministry coverage (WSIA and Chubb Insurance)**

A Placement of a Student Trainee is considered an Unpaid Work Placement for the purposes of the Ministry paid WSIA Benefits or Chubb insurance coverage if it meets the following criteria:

1. The Placement is unpaid. The Placement is considered to be unpaid even if the Student Trainee receives one or more of the following types of payment:
  - Social assistance benefits (e.g., through Ontario Works Program);
  - Training allowances;
  - Honoraria;
  - Reimbursement of expenses; and,
  - Stipends or any money paid to the Student Trainee by the Training Agency.
2. The Placement, which may be required or optional, 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 purposes of the completion of the Approved Program.
3. The Placement is authorized by the Training Agency.

4. 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.

### **Ineligibility for MAESD Coverage (WSIA and ACE-INA)**

The following types of placements are not eligible to receive Ministry covered Benefits or Chubb Insurance coverage:

1. Placements for which a Student Trainee is paid a salary;
  - A Student Trainee on a placement who receives payment or wages from the Placement Employer is considered to be a worker and must be provided with workplace insurance coverage paid for by the Placement Employer as is any other worker employed by the Placement Employer.
2. Placements with a Training Agency listed in Appendix A;
  - This includes Student Trainees who, as part of their Approved Program, do unpaid research or other work for their Training Agency.
3. Placements outside of Ontario (international and other Canadian jurisdictions), in the case of Ministry covered WSIB Benefits.
  - Exception: A Student Trainee in this situation would still be eligible for the Ministry-covered costs of private insurance with Chubb Insurance.
4. Placements in the country of primary residence of the international Student Trainee.
  - A Student Trainee in this situation would not be eligible for Ministry coverage of WSIB Benefits or the costs of private insurance with Chubb Insurance.

### **Student Safety (WSIA and CHUBB Insurance)**

The Training Agencies must use due diligence to ensure that Student Trainees are not placed in unsafe working environments. This includes conducting an evaluation of the safety practices of the potential Placement Employer, when arranging Unpaid Work Placements for Student Trainees,.

### **The Unpaid Student Placement Process**

#### ***Arranging a Placement***

When making arrangements for a field placement, it is essential to first determine whether the employer is covered by WSIB or not.

If the employer **is covered by WSIB** follow the general instructions below and the instructions in **SECTION 1**. If the employer **is not covered by WSIB** follow the general instructions below and the instructions in **SECTION 2**.

### ***General Pre-placement Responsibilities***

Prior to Student Trainees commencing an Unpaid Work Placement, the Training Agency is responsible for:

- Informing Student Trainees that if they have an accident while on an Unpaid Work Placement while enrolled in an Approved Program, the Training Agency will disclose personal information relating to the Unpaid Work Placement and any WSIB claim or Chubb Insurance claim to the Ministry;
- Informing Student Trainees that they are eligible to make a claim for Benefits in the event of an accident incurred while in an eligible Unpaid Work Placement;
- Ensuring that the Placement Employer understands the coverage available to Student Trainees on Unpaid Work Placements;
- Confirming whether the Placement Employer has WSIB coverage during the period of the Unpaid Work Placement; and,
- Ensuring that the Placement Employer, if it has WSIB coverage, is aware of WSIB reporting procedures in the event of an accident.

**When confirming Unpaid Work Placements** with the Placement Employer the Training Agency must provide the following information prior to the Student Trainee's placement:

- Student Trainee full name;
- Specific days when the Student Trainee will be at the Placement Employer's worksite; and,
- Student Trainee acceptance of the conditions of the Unpaid Work Placement.

**When the Training Agency is placing multiple Student Trainees** with the same Placement Employer, the Training Agency may provide a list of Student Trainees to the Placement Employer along with the following:

- Specific days when each Student Trainee will be at the Placement Employer's worksite; and,
- Confirmation that Each Student Trainee has been made aware of the conditions of the Unpaid Work Placement.

### **Postsecondary Student Unpaid Work Placement Workplace Insurance Claim Form**

If a Student Trainee incurred an injury/disease while on an Unpaid Work Placement, the Training Agency, the Student Trainee and the Placement Employer must complete (and sign) the MTCU *Postsecondary Student Unpaid Work Placement Workplace Claim Form* in order to make a WSIB claim, including:

- Confirmation of the Training Agency;
- Confirmation of the Placement Employer; and
- The Student Trainee's signature indicating consent to the indirect collection of personal information by MAESD;

- The signature of a parent or guardian is required to indicate consent if the Student Trainee is under 16 years of age.

**Note: this consent is specific to the disclosure of personal information for the purposes of a WSIB claim and is not for other purposes.**

**Note: The Postsecondary Student Unpaid Work Placement Workplace Insurance Claim Form can be accessed from [the Ontario Central Forms Repository](#).**

## SECTION 1:

### Arranging a Placement with a Placement Host that is covered by WSIB

The College is considered a “training agency” by definition under the WSIB Policy on Training Placements (#12-04-05) and employers who accept field placements are referred to as “placement hosts”. Students are considered “learners on unpaid work placements”. Costs related to compensable injuries are not borne by either the placement host or the training agency. These costs are transferred to the Ministry of Advanced Education and Skills Development (MAESD), however, both the placement host and the training agency share in responsibilities for documentation.

### Reporting a Work-Related Injury/Exposure/Disease to WSIB:

**Within three days of learning of a work-related injury/disease the Placement Employer must complete WSIB Form 7 *Employer’s Report of injury/exposure/disease* (which can be access from: [www.wsib.on.ca](http://www.wsib.on.ca) and send it to the Training Agency.**

**The form must be then submitted by the Training Agency to WSIB within seven business days of learning of a work-related injury/disease.**

Reporting is required when a Student Trainee experiences an injury/disease while on an Unpaid Work Placement that:

- Requires health care by a health care professional for which there is a fee for service (this could include a physician, dentist, chiropractor, hospital, etc.);
- Results in lost time from work beyond the date of the work-related injury/disease;
- Requires modified work for more than seven calendar days; and/or
- Results in exposure to communicable disease.

#### **Note:**

- Any accident, 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 (immediate supervisor) and to the appropriate contact person in the Training Agency.
- Information must include when, where, and how the work-related accident occurred.
- Accidents requiring only first-aid **do not have to be reported to the WSIB** but a record of the details should be kept by the Training Agency in the event that a report is required in the future.

Detailed instructions and guidelines for completing Form 7 *Employer’s Report of injury/disease* are included with the form on the WSIB website at: [www.wsib.on.ca](http://www.wsib.on.ca)

All Training Agencies have been assigned a unique firm numbers to be used in all correspondence with the WSIB.

Attention to detail at the time of reporting helps eliminate later difficulties and unnecessary delays resulting from the WSIB’s need to request routine information.

## Process for Submitting a Claim through WSIB

### ***Pre-Placement:***

#### ***Student Consent and Ministry Documentation***

- Have the student complete the Student / Learner Placement Consent form. (Appendix A)

#### ***Communication with the Placement Host***

- Send the placement host a letter explaining WSIB and Insurance coverage. (Appendix C)  
Appendix C is a sample letter, which is provided for your reference. Modifications reflecting the specifics of your particular program may be made to this sample, but the portions relating to WSIB and insurance should be included as is.

#### ***Attach to this letter:***

- A blank Postsecondary Student Unpaid Work Placement Workplace Insurance Claim Form (Appendix B). This must be signed by an authorized representative of the placement host and returned to you, only when an injury occurs.
- A copy of the Letter of Authorization to Represent a Placement Host. **This form is ONLY to be completed when an injury occurs.** (Appendix D)

### ***Forms:***

*Appendices A, B, C and D are available on-line at the Risk Management Department website:*

<http://www3.algonquincollege.com/safety-security-services/home/occupational-health-and-safety/student-field-placement-information-2/>

*Appendix B may also be accessed from the Postsecondary Education website:*

<http://www.forms.ssb.gov.on.ca/mbs/ssb/forms/ssbforms.nsf/FormDetail?OpenForm&ACT=RDR&TAB=PROFILE&SRCH=&ENV=WWE&TIT=1352&NO=022-13-1352E>

***Please follow any distribution directions on the forms and keep copies of all documents in your department. The Occupational Health & Safety office only requires copies of documentation at the time of an injury.***

### ***During Placement:***

#### ***Step 3 – In the Event of an Injury***

Minor injuries that require only first aid treatment are not reportable to WSIB. Placement hosts should follow their usual internal documentation procedures for any such injuries involving placement students.



The following instructions apply only to injuries or exposures to communicable diseases that result in treatment by a health care practitioner or lost time from a work placement beyond the date of the accident. These injuries must be reported to WSIB.

- Ensure the placement host follows the procedures they would normally for their own staff by completing a WSIB Form 7 and assist them by providing necessary student information. These forms are typically held in their human resources area and can be found on-line at <http://www.wsib.on.ca>
- Ensure the placement host completes the *Postsecondary Student Unpaid Work Placement Workplace Insurance Claim Form*.
- Ensure the placement host completes a Letter of Authorization to Represent a Placement Host form
- Forward the completed Form 7, the Postsecondary Student Unpaid Work Placement Workplace Insurance Claim Form and the Letter of Authorization to the Occupational Health & Safety office at the College within 24-48 hours.

***The Occupational Health & Safety office will ensure proper completion and forward the documentation to WSIB and the Ministry of Education.***

#### **WSIB Penalties for late filing**

- The completed Form 7 *Employer's Report of injury/disease* along with *Letter of Authorization to Represent the Placement Employer* and the Postsecondary Student Unpaid Work Placement Workplace Insurance Claim Form must be completed by the Placement Employer and submitted to the Training Agency within three days of learning of the work-related injury/disease
- The Form 7 *Employer's Report of injury/disease* must be submitted by the Training Agency to WSIB within seven business days of learning of the work-related injury/disease.
- WSIB may impose a \$250 penalty for each separate incident of late submission, incomplete information, not reporting on a pre-approved version of this form, and/or failing to provide a copy of the completed Form 7 *Employer's Report of injury/disease* to the Student Trainee.
- Failing to comply with reporting requirements is a provincial offence.
- Training Agencies should not delay submitting Form 7 *Employer's Report of injury/disease* while waiting for more detailed information. - For example, if statements from witnesses are not finalized or available by the deadline date for submission, incomplete reports may be filed to comply with the seven-day requirement. Additional pertinent information can be forwarded in a letter as soon as possible after the work-related injury/disease.
- The completed Form 7 can be submitted to WSIB electronically (e-form) or by facsimile/courier to ensure the seven-day time limit is met. - If sent by facsimile a hard copy of the Form 7 must be sent by mail to WSIB as follow-up.
- If there is a delay that can be justified the Training Agency must explain the circumstances in a letter to WSIB who may choose to waive the late fee.

**If the College Receives a Fine**

Should the college receive a fine from WSIB for any of the following:

- late reporting
- incomplete reporting,
- not reporting on a pre-approved version of the form,

The non-compliant department's Dean or Director will be responsible to cover the cost of the fine. OHS will investigate in conjunction with Human Resources and Finance will be made aware of the decision.

## SECTION 2:

### Arranging a Placement with a Placement Host that is NOT Covered by WSIB

The Ministry of Advanced Education and Skills Development (MAESD) maintains insurance through the CHUBB Insurance (*formally known as ACE INA*) to provide coverage for students who undertake placements with hosts who are not covered by WSIB. Students who experience an injury while at a placement host must file a claim with CHUBB by completing the necessary documentation, which is detailed in this section. Under these circumstances the College is considered a training agency and employers who accept field placements are considered placement hosts. Both the placement host and the training agency share in responsibilities for documentation.

The second section of this document relates to employers who are not covered by WSIB. This includes:

- Ontario employers who are not covered by WSIB
- Out of province employers who are not part of the Ontario WSIB system
- Out of country employers who are not part of the Ontario WSIB system

#### ***Pre-Placement:***

##### ***Step 1 – Student Consent and Ministry Documentation***

- Have the student complete the Student / Learner Placement Consent form. (Appendix A)

##### ***Step 2 – Communication with the Placement Host***

- Send the placement host a letter explaining WSIB and Insurance coverage. Appendix E is a sample letter, which is provided for your reference. Modifications reflecting the specifics of your particular program may be made to this sample, but the portions relating to insurance should be included as is.

#### **Attach to this letter:**

-The blank the Postsecondary Student Unpaid Work Placement Workplace Insurance Claim Form (Appendix B). This must be signed by an authorized representative of the placement host, the student and returned to Student Placement Coordinator, only when an injury occurs.

#### ***Forms:***

*Appendices A, B and E are available on-line at the Department Risk Managements website:*

<http://www3.algonquincollege.com/safety-security-services/home/occupational-health-and-safety/student-field-placement-information-2/>

*Appendix B may also be accessed from the Postsecondary Education website:*

<http://www.forms.ssb.gov.on.ca/mbs/ssb/forms/ssbforms.nsf/FormDetail?OpenForm&ACT=RDR&TAB=PROFILE&SRCH=&ENV=WWE&TIT=1352&NO=022-13-1352E>

***Please follow any distribution directions on the forms and keep copies of all documents in your department. The Occupational Health & Safety office only requires copies of documentation at the time of an injury.***

### ***Step 3 – In the Event of an Injury***

Minor injuries that require only first aid treatment are not reportable to CHUBB. Placement hosts should follow their usual internal documentation procedures for any such injuries involving placement students.

**The following instructions apply only to injuries or exposures to communicable diseases that result in treatment by a health care practitioner or lost time from a work placement beyond the date of the accident. These injuries must be reported.**

In order for us to determine the eligibility for this benefit, we will require the following:

- Accidental Medical claim form fully completed by the claimant (Appendix F)
- Authorization to Obtain Information completed by the claimant (Appendix G)
- Employer / Administrator Statement completed by an authorized representative (Appendix H)
- Any other medical documents to support the claim (i.e., test results supporting diagnosis or hospital records if available)
- Forward the Postsecondary Student Unpaid Work Placement Workplace Insurance Claim Form (Appendix B), the CHUBB Accidental Medical claim form (Appendix F), the Authorization to Obtain Information form (Appendix G), the Employer / Administrator Statement form (Appendix H) and any other supporting documents to the Occupational Health & Safety office at the College within 24-48 hours.

The Occupational Health & Safety office will ensure proper completion and forward the documentation to CHUBB Insurance and the MAESD.

## **List of Appendices**

**Appendix A** – Student / Learner Placement Consent

**Appendix C** – Sample Letter to Placement Host Covered by WSIB

**Appendix D** – Letter of authorization to Represent a Placement Host

**Appendix E** – Sample Letter to Placement Host not Covered by WSIB

**Appendix F** – CHUBB Accidental Medical claim form

**Appendix G** – CHUBB Authorization to Obtain Information form

**Appendix H** – CHUBB Employer / Administrator Statement form