

Merchant Navy Training Board

Guidance on workplace experience placements

1. Introduction

- 1.1 Many schools and colleges require their students to undertake work experience placements lasting for a week or two. Introducing students to the world of work can help them understand the work environment, choose future careers or prepare for employment. An appreciation of risks in workplaces and how to deal with them can be one of the biggest benefits offered by a work placement.
- 1.2 There is no reason why shipping companies should not consider offering work experience placements. Such placements could be of great value in introducing students to the operations of ships and shipping companies and encourage them to apply for careers in shipping on leaving secondary or tertiary education.
- 1.3 Some companies may wish to offer workplace experience placements that include time spent onboard ships. This could be restricted to visits to the ship whilst it is in port. A company wishing to offer a placement that includes a shipboard voyage may be in a position to do so, depending on the types of ship they operate, their trading patterns and areas of operation. They must also take account of legal considerations, including a requirement to undertake a health and safety risk assessment. Possible alternatives to shipboard experience are time spent in a seafarer training centre, perhaps using a simulator if one is available.
- 1.4 These guidelines are designed to assist companies to ensure that students have their health, safety and welfare protected while they undertake work experience placements, particularly if they are to spend time on board ships.

2. Definitions of young people and children by age

- 2.1 According to the ILO Maritime Labour Convention, 2006 (MLC);
 - A young person is anyone under 18.
 - A child is anyone who has not yet reached the official minimum school leaving age (MSLA). Pupils will reach the MSLA in the school year in which they turn 16.
- 2.2 The MLC prohibits any person who has not reached the age of 16 from working on board a ship to which it applies. Any company offering shipboard experience as part of a workplace experience placement must therefore take care to ensure that the student does not perform any work on account of the ship whilst on board. However it would be acceptable for the student to take and write up notes of what is observed on board, along with discussions with members of the ship's crew.

3. Action by companies

- 3.1 Existing arrangements for assessing and managing risks to young people will be suitable in respect of students undertaking work experience.
- 3.2 Companies that do not currently employ a young person, have not done so in the last few years and are taking on a workplace experience student for the first time, or one with

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particular needs, will need to review their risk assessments before they start. Merchant Shipping Notice (MSN) 1838 provides guidance on the risks to be covered in a risk assessment for young persons. However an appropriate risk assessment should also be carried out whenever it is proposed that a child should undertake workplace experience without performing any work.

- 3.3 Companies should discuss the placement in advance with any school or college from which they might receive a request for a placement. They should take account of what they and the parents or carers of any applicant say in respect of the student's physical and psychological capacity and of any particular needs, for example health conditions, food allergies or learning difficulties.
- 3.4 It will be important to consider carefully:
 - what tasks any student on work experience will be asked to perform;
 - what supervision they will have;
 - the risks associated with these tasks and how these are managed;
 - what training will need to be provided
 - the provision of suitable Personal Protective Equipment
- 3.5 Standard shipboard familiarisation should in all cases be given to students undertaking work experience on ships, even if they only spend one day or part of a day onboard. Information on what they will need to do in an emergency will need to be clearly spelled out and care taken to ensure that it is properly understood. The students should participate in emergency drills.
- 3.6 Specific factors that must be managed for students will require consideration. These will include exposure to physical, chemical and biological agents, noise and vibration and any extremes of temperature that are foreseeable.
- 3.7 Companies should provide information for schools, colleges and other establishments as well as parents and guardians concerning the most significant risks and what has been done to control them. This may be done verbally but the preparation of a standard information sheet might be the most effective means of achieving this.
- 3.8 Students should understand the risks and how they are controlled, as well as knowing how to raise any health and safety concerns.

4. Training and supervision

- 4.1 Workplace experience students are likely to be new to the workplace and in some cases will be facing unfamiliar risks from the job they will be doing and from their surroundings. Companies will need to provide them with clear and sufficient instruction, training and supervision to ensure that they avoid putting themselves and others at risk.
- 4.2 Children and young people are likely to need more supervision than adults. Good supervision will provide a clear idea of the young person's capabilities and progress in the job and enable monitoring of the effectiveness of their training.
- 4.3 It is important to check that students have understood the instruction and training which will include, for example:
 - the hazards and risks in the workplace;
 - the health and safety precautions that are in place.
- 4.4 In workplaces where there are health and safety representatives, they can play a valuable role early on by:
 - introducing the student to the workplace;
 - helping with their ongoing training;
 - providing feedback about particular concerns.

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- 4.5 It is important to make clear to students that, in common with employees, they have a duty to take care of their own health and safety and that of others who may be affected by their actions. This includes co-operating with their supervisors, particularly by listening carefully, following instructions, correctly using any safety equipment that has been provided and taking part in relevant training.

5. What the law says

- 5.1 Under health and safety law, workplace experience students must be treated in the same way as if they were employees.
- 5.2 Under merchant shipping law, every employer must ensure, so far as reasonably practicable, the health and safety of all their employees, irrespective of age. As part of this, there are certain considerations that need to be made for young people.
- 5.3 The Merchant Shipping and Fishing Vessels (Health and Safety) (Employment of Young Persons) Regulations 1998 place a responsibility on shipping companies to ensure that young people employed by them are not exposed to risk due to:
lack of experience;
being unaware of existing or potential risks;
lack of maturity.
- 5.4 The following must be considered:
- the layout of the workplace;
 - the persons responsible for their supervision
 - the physical, biological and chemical agents they will be exposed to;
 - how they will handle work equipment;
 - how the work and processes are organised;
 - the extent of health and safety training needed;
 - risks from particular agents, processes and work.
- 5.5 The company must ensure that the student will not be asked to perform any task that:
- is beyond their physical or psychological capacity. This can be done by checking that they are capable of safely lifting weights and of remembering and following instructions;
 - involves harmful exposure to substances that are toxic or carcinogenic or can chronically affect human health in any other way;
 - involves risk of accidents that cannot reasonably be recognised or avoided by young people because of their lack of experience or training or appreciation of danger, or the characteristics and capabilities of those working around them;
 - has a risk to health from extreme cold, heat, noise or vibration (in most cases, young people will not be at any greater risk than adults)
- 5.6 The company should take account of physical, chemical and biological agents and other potential hazards that might be encountered by a work experience student. Care should be taken to avoid any activities that involve the following:
- exposure to lead and lead processes;
 - exposure to asbestos;
 - exposure to explosives, including fireworks;
 - activities involving compressed air;
 - activities involving electrical installations
 - entry into oxygen-depleted spaces
- 5.7 Schools and colleges and other bodies that supply students for work experience placements need to check that the provider of the placement has risk management arrangements in place. Relevant conversations need to be noted for reference.
- 5.8 The parents or guardians of any child must be advised of the possible risks and the measures put in place to control them. This can be done in whatever way is simplest and suitable, including verbally.

6. Working hours and young workers

- 6.1 The Merchant Shipping (Hours of Work) Regulations set out minimum rest periods for seafarers, although more stringent rules are applied by the Merchant Shipping and Fishing Vessels (Health and Safety) (Employment of Young Persons) Regulations 1998. In addition the Merchant Shipping (Maritime Labour Convention) (Minimum Requirements for Seafarers etc.) Regulations 2014 prohibit young persons from undertaking night work. Since a workplace experience student would not be undertaking an established programme of training, no exceptions from this rule would apply.
- 6.2 Students and young persons have different employment rights from adult workers and are subject to protections in relation to the hours they can work.

7. DBS checks

- 7.1 All members of the company's staff who will have a role in supervising a workplace experience student who is aged 16 or under – whether ashore or onboard ship – should undergo a Disclosure and Barring Service (DBS) check. This is likely to be a requirement of any school or college that an applicant attends.

8. Insurance

- 8.1 Companies should discuss any proposals to offer shipboard workplace experience with their Protection and Indemnity (P&I) Insurers, to verify that the insurance provision is valid. It may be that a student will need to be recorded as a passenger on the ship.

9. Accommodation

- 9.1 Companies wishing to offer placements involving nights on board ship will need to consider very carefully the welfare of students. It will not be appropriate to place students in cabins that they will share with members of the crew. Accommodating them in single-berth accommodation should also be avoided. If two students are given concurrent placements and are happy to share a twin-berth cabin, this may be considered. The cabin should have its own ensuite sanitary facilities.
- 9.2 Should a student undertaking a placement onboard a vessel wish to disembark, arrangements should be made to permit disembarkation at the earliest opportunity.