

Student Placements and Internships Policy and Procedure

1. Overview

Internships and vocational placements offer AFTRS students and graduates invaluable on-the-job experience, insights, connections and opportunities for career progression in the screen and broadcast industries. AFTRS encourages and facilitates both paid and unpaid internship opportunities, and placements associated with a range of industry organisations, broadcasters and production companies. The internships and placements may be competitive, sourced by the student or sourced by a staff member.

Internship opportunities may become available to AFTRS students and recent graduates in a range of ways. These include:

- Existing AFTRS relationships with broadcasters, film festivals, government departments or production companies;
- New or one-off opportunities, including on specific productions;
- Student-sourced internships or attachments; or
- Opportunities for a specific cohort of students, e.g. Indigenous students, students living with a disability, etc.

In all of these cases, the opportunity should be raised at the earliest opportunity with the AFTRS Industry Manager (Students) who can assess whether AFTRS support and insurance cover will apply.

The applicability and conditions of such support are determined by the Industry Manager (Students), in line with this policy.

2. Purpose

This policy outlines the mechanisms by which students can undertake placements and internships that are facilitated by AFTRS. It provides parameters for staff to respond to requests from students and/or from those offering a placement or internship. It also clarifies what arrangements are not facilitated by AFTRS and what arrangements students may make independently of AFTRS.

This policy complies with the *Fair Work Act 2009 (Fair Work Act)* and is consistent with the Fair Work Ombudsman's Fact Sheets and other information on unpaid work.

This policy also ensures that AFTRS meets the following related higher education legislation:

- Higher Education Support Act (HESA) 2003 – Section 169-20(2)
- TEQSA Higher Education Standards Framework (Threshold Standards) 2015
- Education Services for Overseas Students (ESOS) Act 2000
- National Code of Practice for Providers of Education and Training to Overseas Students (The National Code) 2017

3. Scope

This policy applies to AFTRS employees and students.

4. Policy Statement

AFTRS supports the following three mechanisms for students undertaking placements and internships that are facilitated by AFTRS:

- Vocational Placement as defined in the Fair Work Act;
- Paid Student Internships (lawful paid work); and
- Unpaid Student Internships (lawful unpaid work).

All vocational placements and student internships facilitated by AFTRS must be approved by AFTRS and have a defined educational objective and/or offer industry-relevant experience to the student.

AFTRS is often approached by companies requesting students to fill internship positions. On many occasions, these are legitimate offers that students would gain value and educational benefit from. These will either be **Unpaid Student Internships** (see 5.3) or **Paid Student Internships** (see 5.2).

In some situations, requests are received for students to fill unpaid positions that appear to have little educational benefit, and could be taken by a paid employee. In such situations, AFTRS will make it clear it does not facilitate or support the opportunity or offer any insurance cover.

5. Vocational Placements

AFTRS defines vocational placements as *Work Placements* as part of the Graduate Diploma of Radio and Podcasting (GDRP) and the Bachelor of Arts Screen: Production (BASP), and *Professional Placements* as part of the Master of Arts Screen (MAS).

AFTRS facilitates vocational placements that meet the definition in the Fair Work Act.

The key criteria from the Act are that:

1. The vocational placement is undertaken as a requirement of an AFTRS course; and
2. The student is not entitled to be paid (for example under a contract).

To meet the first criteria, the following are mandatory:

- The requirement for a vocational placement is structured within the relevant course/subject;
- The learning outcomes and assessment tasks are approved; and
- The placement is endorsed by Discipline Lead/Program Convenor and approved by Director of Teaching & Learning.

Students on vocational placement will be covered by the School's insurance.

The decision of whether a vocational placement subject, as part of a higher education award course, can charge tuition fees to students must be determined in line with 'work experience in industry' eligibility as part of *Higher Education Support Act (HESA) 2003* legislative compliance.

5.1 Procedure

Work Placement: GDRP and BASP

a. Student Expression of Interest Process

Students may be asked to complete a survey to collect information on their career aspirations and any factors that might impact their work placement.

AFTRS faculty review this information in order to identify and negotiate suitable placements for students based on the individual student's interests, the suitability for students to trial particular industry roles, travel arrangements, potential future employment opportunities and make meaningful industry connections.

For Radio and Podcasting students, AFTRS faculty may also recommend the student complete structured industry mentoring in lieu of their work placement. Likewise, a student is able to request structured industry mentoring in lieu of their work placement (GDRP only).

b. Risk Mitigation

AFTRS Radio Work Placement/AFTRS BA Work Placement Form is to be signed by the host organisation and approved by AFTRS Discipline Lead/Program Convenor/Subject Leader/Head of Radio (GDRP only) and Industry Manager (Students) prior to commencement of the placement.

This document includes an assessment that covers all expected due diligence activities and declaration to be signed by the host organisation:

- The student undertaking this placement is not replacing an otherwise employable position
- You have conducted a suitable risk assessment relating to the student placement activities
- Work will be supervised as appropriate
- You will provide a safe work environment in accordance with all applicable laws and the AFTRS Charter of Conduct - <http://www.aftrs.edu.au/student-centre/student-handbook>
- You will provide a workplace that is culturally safe and accessible
- Where possible, provide feedback for the student upon completion of the work Placement - <https://form.aftrs.edu.au/StudentPlacementFeedbackForm.php>
- AFTRS covers Public Liability and Personal Accident insurance for the student for the duration of the work placement
- In signing this you warrant that, in relation to the work placement information, the above is true and correct to the best of your knowledge at the date of signing and that during the total period of placement you will maintain the processes you have declared above, under the heading 'Declaration'. Completing the above declaration does not limit your obligations under the Fair Work Act 2009

The AFTRS Discipline Lead/Subject Leader confirms that the placement complies with the AFTRS Student Internship Guidelines and that:

- The placement primarily benefits the student rather than the company
- The student is not filling a position which would otherwise be a paid position
- The placement ends prior to the student's graduation
- The student is not entitled to receive remuneration from the placement provider.

The AFTRS Program Convenor/Divisional Director confirms that the placement complies with the AFTRS Student Internship Guidelines.

c. Reporting

At the conclusion of the placement, the host organisations are contacted by the GDRP Program Coordinator/Industry Manager (Students) and asked to complete an [online feedback survey](#).

Students of the BASP program are asked to complete a subject survey at the completion of their placement.

Professional Placement: MAS

a. Student Application Process

Students are invited to apply for professional placements. Their application could include but not limited to submitting their CV, current work samples, letter of interest and portfolio of work.

In some cases, the Industry Manager (Students) along with AFTRS faculty review the applications and material supplied to provide a shortlist of candidates to the host organisations.

Host organisations review applications and choose the student(s) they would like to interview, with final selection determined at the conclusion of all interviews.

b. Successful Candidates

The successful candidates are notified by the Industry Manager (Students). The start and end dates of the placement are negotiated directly between the student and host organisation.

c. Risk Mitigation

AFTRS Professional Placement Form is to be signed by the host organisation and approved by AFTRS Discipline Lead/Subject Leader and Industry Manager (Students) prior to commencement of the placement.

This document includes an assessment that covers all expected due diligence activities and declaration to be signed by the host organisation:

- The student undertaking this placement is not replacing an otherwise employable position
- You have conducted a suitable risk assessment relating to the student placement activities
- Work will be supervised as appropriate
- You will provide a safe work environment in accordance with all applicable laws and the AFTRS Charter of Conduct - <http://www.aftrs.edu.au/student-centre/student-handbook>
- You will provide a workplace that is culturally safe and accessible
- Where possible, provide feedback for the student upon completion of the Professional Placement - <https://form.aftrs.edu.au/StudentPlacementFeedbackForm.php>
- AFTRS covers Public Liability and Personal Accident insurance for the student for the duration of the Professional Placement
- In signing this you warrant that, in relation to the professional placement information, the above is true and correct to the best of your knowledge at the date of signing and that during the total period of placement you will maintain the processes you have declared above, under the heading 'Declaration'. Completing the above declaration does not limit your obligations under the Fair Work Act 2009

The AFTRS Discipline Lead/Program Convenor/Subject Leader confirms that the attachment complies with the AFTRS Student Internship Guidelines and that:

- The placement primarily benefits the student rather than the company
- The student is not filling a position which would otherwise be a paid position
- The placement ends prior to the student's graduation
- The student is not entitled to receive remuneration from the placement provider

The Industry Manager (Students) confirms that the placement complies with the AFTRS Student Internship Guidelines.

d. Reporting

Student placement allocation data is tracked and reported for the Annual Report.

At the conclusion of the placement, the host organisation is contacted by the Industry Manager (Students) and asked to complete an [online feedback survey](#).

The students are also contacted by the Industry Manager (Students) to provide feedback. The feedback includes information about the quality of the host organisation and improvement opportunities. Any issues that are identified are to be addressed with the host organisation by the Discipline Lead/Subject Leader/Program Convenor and the Industry Manager (Students).

6. Paid Student Internships/Traineeships

If a vocational placement is not required as part of award or non-award coursework, AFTRS may facilitate a student undertaking paid work via a student internship provided that:

1. The student is paid at least a minimum wage and the contract is compliant with the National Employment Standards and the terms of any applicable award or enterprise agreement
2. The student is provided with an opportunity to develop their skills and gain experience towards their career goals

The staff member recommending the internship should consult with the Industry Manager (Students) to ensure that the arrangement is compliant with minimum wage, the National Employment Standards and the terms of any applicable award or enterprise agreement.

Students undertaking a paid student internship that is approved by AFTRS can be covered by the employee's insurance.

6.1 Procedure

a. Student Application Process

Students are invited to apply for a paid student internship. Their application could include but is not limited to submitting their CV, current work samples, letter of interest (in some cases, answering specific host organization questions) and portfolio of work.

In some cases, the Industry Manager (Students) along with AFTRS faculty review the applications and material supplied to provide a shortlist of candidates to the host organisations.

Host organisations review applications and choose the student(s) they would like to interview, with final selection determined at the conclusion of all interviews.

b. Successful Candidates

The successful candidates are notified by the Industry Manager (Students). The start and end dates of the internship are negotiated directly between the student and host organisation along with the employment contract.

c. Reporting

Student internship allocation data is tracked and reported for the Annual Report.

At the conclusion of the internship, the host organisation is contacted by the Industry Manager (Students) and asked to complete an [online feedback survey](#).

The students are also contacted by the Industry Manager (Students) to provide feedback. The feedback includes information about the quality of the host organisation and improvement opportunities. Any issues that are identified are to be addressed with the host organisation by the Discipline Lead/Subject Leader/Program Convenor and the Industry Manager (Students).

7. Unpaid Student Internships

If a vocational placement is not required as part of award or non-award coursework, AFTRS may facilitate a student undertaking unpaid work via a student internship provided that:

3. The arrangement is lawful
4. The student is provided with an opportunity to develop their skills and gain experience towards their career goals

Whether the first criterion is met, depends on whether an employment relationship exists between the student and the organisation offering the internship. This is determined on a case by case basis, after considering a number of factors.

As this is an important determination, the staff member recommending the internship should consult with the Industry Manager (Students) to ensure that the arrangement is lawful and does not constitute an employment relationship. If there is doubt in making the determination, legal advice should be sought.

Students undertaking an unpaid student internship that is approved by AFTRS can be covered by the School's insurance.

7.1 Procedure

a. Student Application Process

Students are invited to apply for an unpaid student internship. Their application could include but is not limited to submitting their CV, current work samples, letter of interest and portfolio of work.

In some cases, the Industry Manager (Students) along with AFTRS faculty review the applications and material supplied to provide a shortlist of candidates to the host organisations.

Host organisations review applications and choose the student(s) they would like to interview, with final selection determined at the conclusion of all interviews.

b. Successful Candidates

The successful candidates are notified by the Industry Manager (Students). The start and end dates of the internship are negotiated directly between the student and host organization.

c. Risk Mitigation

AFTRS Unpaid Internship Form is to be signed by the host organisation and approved by AFTRS Discipline Lead/Subject Leader/Lecturer and Industry Manager (Students) prior to commencement of the placement.

This document includes an assessment that covers all expected due diligence activities and declaration to be signed by the host organisation:

- The student undertaking this unpaid internship is not replacing an otherwise employable position.
- This internship benefits the student more than the company.
- You have conducted a suitable risk assessment relating to the student internship activities.
- Work will be supervised as appropriate.
- The student is not expected to fulfil a 'productive' role crucial to the company's business. A good benchmark is given by Fairwork Australia (2012): "If a business is gaining a significant benefit as a result of engaging the person, this may indicate an employment relationship has been formed."
- You will provide a safe work environment in accordance with all applicable laws and the AFTRS Charter of Conduct - <http://www.aftrs.edu.au/student-centre/student-handbook>
- You will provide a workplace that is culturally safe and accessible
- Where possible, provide feedback for the student upon completion of the Unpaid Internship - <https://form.aftrs.edu.au/StudentPlacementFeedbackForm.php>
- AFTRS covers Public Liability and Personal Accident insurance for the student for the duration of the Unpaid Internship.
- In signing this you warrant that, in relation to the unpaid internship information, the above is true and correct to the best of your knowledge at the date of signing and that during the total period of the internship you will maintain the processes you have declared above, under the heading 'Declaration'. Completing the above declaration does not limit your obligations under the Fair Work Act 2009.

The AFTRS Discipline Lead/Program Convenor/Subject Leader confirms that the attachment complies with the AFTRS Student Internship Guidelines and that:

- The internship primarily benefits the student rather than the company,
- The student is not filling a position which would otherwise be a paid position,
- The internship ends prior to the student's graduation, and
- The student is not entitled to receive remuneration from the internship provider. However, it is in the discretion of the host should they choose to do so.

The Industry Manager (Students) confirms that the placement complies with the AFTRS Student Internship Guidelines.

d. Reporting

Student internship allocation data is tracked and reported for the Annual Report.

At the conclusion of the internship, the host organisation is contacted by the Industry Manager (Students) and asked to complete an [online feedback survey](#).

The students are also contacted by the Industry Manager (Students) to provide feedback. The feedback includes information about the quality of the host organisation and improvement opportunities. Any issues that are identified are to be addressed with the host organisation by the Discipline Lead/Subject Leader/Program Convenor and the Industry Manager (Students).

8. Unfacilitated Unpaid Student Internships

When requests are made for students to fill unpaid positions that appear to have little educational benefit, and could be taken by a paid employee, AFTRS will not consider this to be a genuine internship opportunity for the purposes of this policy.

Staff receiving such requests need to communicate this view to the organisation making the offer and let them know that AFTRS adheres to the requirements of the Fair Work Act in relation to internships.

Student considering such requests are recommended to seek independent legal advice should they still wish to pursue it. Students can refer to Section 4.2 of the Student Handbook that outlines the circumstances under which students can apply for leave for industry experience.

The School's insurance will not cover unfacilitated unpaid student internships.

9. Indigenous Placements and Internship Protocols

Before a student of Aboriginal and Torres Strait Islander descent is offered a placement or internship, the staff member recommending the internship will need to consult with the Director of First Nations and Outreach to make sure that all appropriate support measures are in place for the student.

For more information refer to the:

Fair Work Ombudsman website

<https://www.fairwork.gov.au/>

Fair Work Fact Sheet: Vocational Placements

<https://www.fairwork.gov.au/how-we-will-help/templates-and-guides/fact-sheets/unpaid-work/student-placements>

Fair Work Fact Sheet: Unpaid Work

<https://www.fairwork.gov.au/how-we-will-help/templates-and-guides/fact-sheets/unpaid-work/unpaid-work>

10. Definitions

Fair Work Act

Fair Work Act 2009

Vocational placement

means a placement that is:

- a) undertaken with an employer for which a person is not entitled to be paid any remuneration; and
- b) undertaken as a requirement of an education or training course; and
- c) authorised under a law or an administrative arrangement of the Commonwealth, a State or a Territory (Fair Work Act 2009 s.12).
- d) Described as 'work placement' for BASP and GDRP programs
- e) Described as 'professional placement' for MAS programs

Unpaid student internship

Lawful unpaid work that is determined not to constitute an employment relationship.

Work Experience in Industry

A defined term, as specified in the Higher Education Support Act 2003, meaning work that is done as part of, or in connection with, a course of study where student learning and performance is not directed by the provider.

11. Approval and Review Details

Approval and Review	Details
Approval Authority	CEO
Responsible Officer	Director of Teaching & Learning
Contact Officer	Industry Manager (Students)
Distribution	BaseCamp and AFTRS website Staff and Student facing
Next Review Date	01/02/2026 <i>The Policy documents will be reviewed every three years from the effective date, or earlier or later, dependant on external factors such as legislative reform, unless another review schedule is required.</i>

Approval and Amendment History	Details
Original Approval Authority and Date and relevant amendments details	CEO 14 February 2023 Comprehensive review and adoption of procedure
Amendments History and Dates	16/04/2018 —v1.0. New document replacing Internship Guidelines and Intership Informations Sheet. <i>DD/MM/YYYY—Amendment detail >> [Include the previous approval authority approval dates and corresponding amendment detail. This section ill will expand over time. In the case of a brand new policy doc, insert N/A]</i>
Notes	N/A
Minor Amendment Approval and History	N/A <i><<DD/MM/20YY — Xxxxx>></i> <ul style="list-style-type: none"> <i>[A minor amendment consists of an administrative edit made to the document or a change that is not material to the document.</i> <i>The Responsible Officer can approve a minor amendment.</i> <i>Insert the date that the Responsible Officer approved the minor amendment along with the details of the amendment (E.g., “01/12/2020 —administrative amendment: update of role titles aligned to restructure” or insert, if not relevant, N/A</i> <i>[If making a minor amendment, <u>do not</u> amend details in the Original Approval Authority section nor amend the version number, only replace the new minor amendment approval date to the file]</i>
Associated Documents	Fair Work Fact Sheet: Vocational Placements Fair Work Fact Sheet: Unpaid Work AFTRS Professional Placement Form AFTRS Radio Work Placement Form AFTRS Unpaid Internships Form AFTRS BA Work Placement Form