



## **External Academic Placement Guidelines of the Barcelona East School of Engineering (EEBE)**

School Board Decision J.EEBE/2022/01/08, of 6 July 2022, to  
approve the EEBE External Academic Placement Guidelines

**Assistant head of studies**

- A favourable report on this document was issued by the Standing Committee on 28 June 2022

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## 1. INTRODUCTION AND TYPES OF PLACEMENT

External academic placements are educational activities that are carried out by university students and supervised by universities. Their aim is to allow students to apply and complement the knowledge they have acquired in their education and to foster the acquisition of competencies that equip them to practise professionally, enhance their employability and promote their entrepreneurial capacities.

Regulations on official university degrees, both Royal Decree 1393/2007, which establishes official university degree regulations, and the University Student Statute (Royal Decree 1791/2010), include the legal concept of external placements. Article 24 of the University Student Statute describes their general characteristics, object, types and other aspects.

Royal Decree 592/2014, of 11 July, which regulates the external academic placement of university students and which was published in the *Official Gazette of the Spanish Government* of 30 July 2014, is the legal basis for UPC regulations and these guidelines.

The UPC's external placement regulations were approved in Governing Council Decision 18/12/2014 (Decision no. 233/2014) and the latest amendment by the Governing Council on 17/12/2021 (Decision 2021/06/37).

### **Type, duration and pay**

On bachelor's and master's degrees at the EEBE, external placements are an optional or compulsory **curricular or extracurricular** activity that students can carry out at a company, institution or public or private entity (hereinafter, a collaborating entity) in Spain or abroad, once they have passed 50% of the total number of ECTS credits on bachelor's degrees or 15 ECTS credits on master's degrees, and if their academic performance parameter was above 0.60 in the previous teaching period. The maximum duration of external **curricular and extracurricular** placements is 900 hours per academic year, and in total 1800 hours for bachelor's degrees and 1200 hours for master's degrees.

They may be linked to work on the bachelor's or master's thesis; if this is the case, the maximum duration may be increased by multiplying the number of credits for the thesis by 15.

Credits for **external curricular placements** count as optional credits on all bachelor's degrees except the bachelor's degree in Biomedical Engineering; in the latter case, they are compulsory (see Appendix I).

The number of hours that bachelor's students may carry out corresponds to 12 ECTS credits (360 hours); in the case of master's students it corresponds to a minimum of 12 ECTS credits and a maximum of 18 ECTS credits (30 hours count for one credit).

**External extracurricular placements** are voluntary and are not part of the curriculum or the academic record, although they are included in the European Diploma Supplement.

**All placements must be remunerated.** The School sets a minimum rate of 6 euros per hour. Exceptions to this rule may be accepted if it is considered that the placement may be academically relevant to the student. In this case, regardless of whether it is a curricular or extracurricular placement a reasoned request must be submitted to Academic Management at the School for review.

**These guidelines cover external curricular placements on bachelor's and master's degrees at the EEBE.**

## 2. AIMS

In the framework of the EHEA, external placements are part of the curriculum and as such are conducted under the supervision of the School. They are designed to complement students' education and their aim is to aid in the acquisition of generic and specific competencies that will equip students for professional practice.

As part of the academic record, external curricular placements are courses that are measured in ECTS credits, studied for, assessed and graded.

This means that they have to be enrolled and that the academic tutor will assess them.

The general aims of these placements are the following:

- To contribute to the comprehensive education of students by complementing their theoretical and practical learning.
- To provide knowledge and work methods that are appropriate to the profession that students will practise, in which they will compare and apply the knowledge they have acquired at university.
- To aid the development of technical, methodological, personal and participatory skills.
- To provide practical experience that facilitates the transition into work.

### 3. RIGHTS AND OBLIGATIONS OF STUDENTS ON A PLACEMENT

During external academic placements students have the following rights and obligations, as described in Royal Decree 9/592 and in the UPC's regulations.

Rights
<ul style="list-style-type: none"> <li>a) Students have the right to be tutored by a lecturer at the School (the academic tutor) and by a person at the collaborating entity where the placement is taking place (the professional tutor).</li> <li>b) They have the right to be assessed according to the criteria established by the UPC and its schools.</li> <li>c) They have the right to be provided with a report by the collaborating entity that includes specific mention of the activity undertaken and its duration and, if applicable, their performance.</li> <li>d) They have the right, in the cases in which this is stipulated, to receive the financial contribution of the collaborating entity in the form of student financial aid.</li> <li>e) They have the right to intellectual and industrial property as foreseen in the regulations on the matter.</li> <li>f) They have the right to be informed of the occupational health and safety regulations by the collaborating entity.</li> <li>g) They have the right to fulfil their academic, training, representation and participation obligations, provided they give prior notice to the collaborating entity.</li> <li>h) They have the right to the necessary resources for persons with a disability to access tutoring services, information and assessment and to equal treatment in the carrying out of a placement.</li> <li>i) Students with a disability have the right to find a balance between the placement and the personal activities and situations stemming from or connected to their disability.</li> <li>j) Other rights foreseen in the prevailing regulations and/or relevant educational cooperation agreements signed by the UPC (and by any entity entrusted by the UPC to handle the placement) and the collaborating entity.</li> </ul>
Obligations
<ul style="list-style-type: none"> <li>a) Students are obliged to comply with the current regulations on external placements established by the UPC.</li> <li>b) They are obliged to be aware of and to carry out their work plan and to follow the instructions of the professional tutor at the collaborating entity and to be supervised by the academic tutor at the UPC.</li> <li>c) They are obliged to maintain contact with the academic tutor at the UPC during the placement and to inform them of any incidents that may arise and to hand in any paperwork required of them, such as interim progress reports and the final report on the placement.</li> <li>d) They are obliged to start the placement at the collaborating entity on the date agreed, observe the timetable foreseen in the work plan and respect the rules and health and safety regulations of the collaborating entity.</li> <li>e) They are obliged to follow the work plan and diligently carry out the activities agreed with the collaborating entity on the basis of the work plan.</li> </ul>

- f) They are obliged to write the final report on the placement and, if applicable, the interim report.
- g) They are obliged to maintain the confidentiality of the collaborating entity's internal information and to observe professional secrecy regarding their activities during their time there and once this time is over.
- h) They are obliged to respect the policies of the collaborating entity and safeguard the reputation of the university to which they belong at all times.
- i) They are obliged to be covered by insurance under the terms established in the educational cooperation agreement.
- j) The agreement will include a clause that exempts the UPC from any liability arising from the breach by the student of the obligations stipulated in the applicable regulations and the agreement itself.
- k) They are obliged to meet any other obligations foreseen in the prevailing regulations and/or relevant educational cooperation agreements signed by the UPC (and by any entity entrusted by the UPC to handle the placement) and the collaborating entity.

#### 4. TUTORING AND COORDINATION OF CURRICULAR PLACEMENTS

Throughout the supervised practical learning process the role of the tutor is essential. The tutor at the collaborating entity must be an employee of the collaborating entity who has professional experience and the necessary expertise to guide students in their learning process at the collaborating entity.

The academic tutor must guide and supervise students during the placement.

The rights and obligations of each tutor are listed below.

Rights of the professional tutor at the collaborating entity
<ul style="list-style-type: none"> <li>a) Professional tutors have the right to have their collaborating activity recognised by the University under the terms set out in the educational cooperation agreement.</li> <li>b) They have the right to be informed of the regulations governing external placements, individual training plans and the conditions for their development.</li> <li>c) They have the right to obtain from the University the information and support they need to fulfil their functions.</li> <li>d) They have the right to any other specific considerations that the University may establish.</li> </ul>
Obligations of the professional tutor at the collaborating entity
<ul style="list-style-type: none"> <li>a) Professional tutors are obliged to receive students and organise the tasks that they must carry out in accordance with the provisions of the individual training plan.</li> <li>b) They are obliged to supervise their activities and guide and supervise their performance in a relationship that is based on mutual respect and a commitment to learning.</li> <li>c) They are obliged to inform students of the organisation and functioning of the entity and its regulations, especially those concerning occupational health and safety.</li> <li>d) They are obliged to coordinate with the academic tutor at the University regarding the performance of the tasks established in the educational cooperation agreement, including</li> </ul>

any changes to the individual training plan that might be deemed necessary for the purposes of the placement, as well as regarding any incidents that may arise and students' leave in the case of examinations.

- e) They are obliged to issue interim reports, if applicable, and final reports.
- f) They are obliged to provide any additional training students may need during the placement.
- g) They are obliged to provide students with the material they need during the placement.
- h) They are obliged to welcome and encourage innovations, proposals for improvement and initiative on the part of students.
- i) They are obliged to give academic tutors access to the collaborating entity's facilities as needed to fulfil their functions.
- j) They are obliged to maintain the confidentiality of any information that they receive from the student as a result of their tutoring.
- k) They are obliged to provide support and assistance to students during their placement at the collaborating entity in resolving any professional issues that may arise.

#### Rights of academic tutors

- a) Academic tutors have the right to have their academic activity recognised under the terms established by the University, in accordance with its internal regulations.
- b) They have the right to be informed of the regulations governing external placements, individual training plans and the conditions for their development.
- c) They have the right to access the collaborating entity's facilities as needed to fulfil their functions.

#### Obligations of academic tutors

- a) Academic tutors are obliged to ensure that the individual training plan is correctly executed and that the placement schedule is compatible with the student's academic, educational, representation and participation obligations at the University.
- b) They are obliged to monitor the placement and, to this end, coordinate with the professional tutor at the collaborating entity in view, if necessary, of the progress reports.
- c) They are obliged to authorise any amendments to the individual training plan.
- d) They are obliged to assess the student's placement.
- e) They are obliged to maintain the confidentiality of any information that they receive as a result of their tutoring.
- f) They are obliged to inform the unit responsible for placements at the School of any incidents.
- g) They are obliged to supervise and, if necessary, request the provision of the resources needed to ensure that students with a disability can carry out the placement in conditions of equal opportunity, non-discrimination and universal accessibility.

## 5. PROCEDURES AND DOCUMENTS

### 5.1 ACCESS TO PLACEMENT OFFERS

- a. Students can search for placements on the EEBE website, in the list of proposals for placements by national and international companies, institutions, public and private entities and the University itself.
- b. Students can also make proposals for placements.

Placements may take place at national or international collaborating entities; the latter type may receive funding from the Erasmus Placement programme.

### 5.2 APPOINTMENT OF ACADEMIC TUTORS AT THE EEBE

Based on the academic workload, departmental coordinators are asked for the list of teaching staff who are available to tutor a curricular placement. The list includes details of the maximum number of placements to be tutored and the degrees to which the tutoring may be linked. The UPC recognises this activity as 0.5 teaching activity evaluation points (PAD) per tutored placement. In the case of extracurricular placements, the assistant director responsible for external placements will act as the tutor.

**5.3 SUBMISSION OF STUDENT APPLICATIONS FOR A PLACEMENT** in accordance with the procedure established by the School.

### 5.4 APPOINTMENT OF ACADEMIC TUTORS AT THE EEBE

Academic tutors are appointed when the administrative conditions of applicants are validated and the company has proposed a work plan. Once the availability and affinity of tutors on each of the degrees have been considered, a tutor will be appointed. In the case of curricular placements linked to the bachelor's or master's thesis, the thesis supervisor will act as the tutor.

### 5.5 ACADEMIC REVIEW OF THE WORK PLAN

Academic tutors are responsible for validating the work plan proposed by the company. If they do not accept the proposed work plan, the company must make a new proposal before the placement starts.

### 5.6 ENROLMENT AND FORMALISATION OF THE EDUCATIONAL COOPERATION AGREEMENT OR EQUIVALENT

Students must first submit the necessary documents. They must have enrolled before starting the placement.



## 5.7 MONITORING AND ASSESSMENT OF THE PLACEMENT

Students must set up an interview with their tutor during the first month. The academic tutor will monitor the student's progress during the placement.

When the placement ends, the academic tutor will assess the placement, taking into account the final report by the student, the oral presentation and the final report by the external tutor at the collaborating entity.

The **final report** gives an account of the student's placement at the facilities in which the placement took place. It is assessed by the academic tutor and must include at least the following (see Appendix III):

- a) The personal details of the student.
- b) The name of the collaborating entity and the address of the facilities at which the placement has taken place.
- c) A concrete and detailed description of the work carried out and the departments to which the student was assigned.
- d) An evaluation of the work carried out and the knowledge and skills acquired in relation to the degree.
- f) A list of the problems tackled and the procedures followed to solve them.
- g) An analysis of the contributions to learning made by the placement.
- h) An appraisal of the placement and suggestions for improvement.

The **final report by the collaborating entity** is a questionnaire that the professional tutor will be asked to fill in by Academic Management. This report will be taken into account by the academic tutor in the assessment. It must include at least the following (see Appendix IV):

- a) Technical skills.
- b) Learning ability.
- c) Work organisation.
- d) Oral and written communication skills. In the case of students with a speech disability, their degree of autonomy as regards oral communication and whether they require any technical and/or human assistance must be stated.
- e) Responsible attitude.
- f) Ability to adapt.
- g) Creativity and initiative.
- h) Personal involvement.
- i) Motivation.
- j) Receptiveness to criticism.
- k) Punctuality.
- l) Relations with work colleagues.
- m) Capacity for teamwork.

n) Any other aspects deemed appropriate.

The **final mark** for the subject will be given by the academic tutor in accordance with the following:

- a) The assessment report by the professional tutor at the collaborating entity (see Appendix IV).
- b) The supervision by the academic tutor.
- c) The final report by the student (see Appendix III).
- d) The presentation/oral defence by the student.

The following weightings will be given:

- i. 50% for the mark awarded by the academic tutor for the student's report and oral presentation.
- ii. 50% for the mark awarded by the academic tutor on the basis of the report by the tutor at the collaborating entity.

The tutor must fill in the assessment report (see Appendix VI), sign it and send it to Academic Management. The report on the placement will be kept by the academic tutor for one year.

Students must answer the **satisfaction survey** (see Appendix V) when they finish the placement for the mark to be entered into their academic record.

The academic tutor may, in a reasoned report, propose that an academic placement be awarded a Distinction. The distinctions to be awarded will be chosen from the proposals received, without exceeding 5% of students who have been assessed for placements before curricular assessment dates in each semester. The following must be taken into account:

- 1- Proposals not accompanied by an explanation will be rejected.
- 2- Distinctions are awarded for the placement with the highest numerical mark.
- 3- If two or more theses have the same numerical mark, the Distinction is awarded to the student with the highest average mark in their academic record.
- 4- If two or more students have the same average mark, the Distinction is awarded to the student with the highest academic performance parameter.

## 6. QUALITY ASSURANCE

The UPC will evaluate the quality of external placements through specific bodies at each school using various instruments to collect the information provided by the three agents involved in the process: students, UPC teaching staff and company employees who act as professional tutors. To this end, it will put control mechanisms in place that ensure that the competencies defined in the work plan are worked on by the student, as well as mechanisms for the continuous improvement of the placements.



## 7. CONFLICT MANAGEMENT AND RESOLUTION

Any incident that occurs will be communicated to the academic tutor, who will set in motion appropriate mechanisms for resolving it. Tutors will inform the assistant academic director or coordinating committee of the master's degree of any incidents.

The School's directors, via the appropriate assistant directors or the coordinating committee of the master's degree, will deploy the mechanisms and academic and/or economic actions needed to resolve the incidents reported, and duly inform the parties involved.

## **APPENDIX I: Specific conditions for placements on the bachelor's degree in Biomedical Engineering**

### **Assignment of places for external curricular placements on the bachelor's degree in Biomedical Engineering**

The curriculum for the bachelor's degree in Biomedical Engineering includes 12 compulsory ECTS credits for external placements (preferably in a health centre or a business operating in the sector). These 12 ECTS credits can generally be taken once subjects in the first three years (180 ECTS credits) have been passed. They are taken from the seventh semester onwards.

For students on an international double degree, the minimum number of credits to be passed is stipulated in the agreement signed.

The total number of hours that students must devote to this activity is 360 hours (30 hours per credit), of which 300 hours correspond to their activities at the company and 60 hours correspond to coordinating with tutors and writing the final report on the activities at the company.

Every semester, the EEBE publishes a list of health centres, companies in the sector and other entities, with a brief description of the individual training plan of the placements that can be carried out at these facilities, the professor-tutor for the degree, who is appointed by the coordinator of the subject Compulsory Placement on the bachelor's degree in Biomedical Engineering, and, if necessary, the requisites or specific conditions that must be fulfilled by applicants. The individual training plan may include the possibility or requisite that applicants carry out the bachelor's thesis simultaneously or after the placement. In these cases, applicants are obliged to carry out the placement and the bachelor's thesis at the facility in question.

In the period set in the EEBE's academic calendar, applicants must submit an application form with multiple choices from the list of health centres and companies in the sector, indicating their order of preference and their motivation for carrying out the placements at each of the facilities.

Applications are reviewed by a committee comprising the following members:

- The coordinator of the subject Compulsory Placement on the bachelor's degree in Biomedical Engineering.
- The assistant director of University-Business Relations at the EEBE.
- The professors on the bachelor's degree in Biomedical Engineering who act as placement tutors.
- A student on the bachelor's degree in Biomedical Engineering appointed by the Student Delegation, who must not have applied for a placement in that semester.
- Administrative and service staff at the EEBE who are in charge of relations with companies and the management of placements.

The committee that issues the decisions on the applications guarantees one place per student from the list published. Places are assigned in accordance with the criteria detailed

below and the need to distribute the places as evenly as possible to ensure that workloads are equally distributed.

The allocation criteria that are taken into account are the following:

- The student's academic record (average mark and credits pending until graduation).
- The motivation given in the application.
- The match between the application and the individual training plan for the placement.

Once the application period is over, the academic management unit publishes the definitive assignment of places, including the tutor at the EEBE and the tutor at the company. Students may appeal against the decision, giving reasons for their disagreement.

If an applicant is deemed unsuitable for a placement, whether by the tutor at the company or the tutor at the EEBE, the latter must put the reasons for the proposed change in writing and submit them to the coordinator of the subject Compulsory Placement on the bachelor's degree in Biomedical Engineering, so that, whenever possible, an alternative place is offered and the smooth running of the placement is ensured.

Once the compulsory work placement has ended, the student may go on to do another 180 hours at the same company as a curricular placement linked to generic optional credits.

## APPENDIX II: Student placement report

### 1. Introduction

#### 1.1. Academic status

Describe your academic status when you started the placement (number of credits passed).

State the way in which you accessed the placement.

#### 1.2. Motivation

Explain why the placement was carried out at a collaborating entity.

Give the reason for choosing the collaborating entity.

#### 1.3. Work plan

Give concrete details of the tasks and work carried out at the collaborating entity.

### 2. Working environment

Give details of the working environment at the collaborating entity.

List the duties assigned and the support received during the placement.

### 3. Work carried out

Describe the work carried out.

List the problems tackled and the procedure followed to solve them.

Give details of the professional challenges faced.

### 4. Previous experience and education

Rate the tasks carried out in relation to the knowledge and skills acquired on the degree.

Identify the contributions to learning of the placement from personal and professional points of view.

### 5. Conclusions

Rate the placement generally.

Rate the quality of the work carried out.

Make suggestions for improvement.

Indicate whether the learning acquired on the bachelor's degree was appropriate to the work carried out. If this was not the case, give details of what could be done to improve it.

## 6. References

If necessary, attach the documents consulted during the drafting of the report.

You are advised to add details to this section as you enter the information in the report.

The recommended citation styles are the Chicago Manual of Style's and ISO 690 in Catalan or Spanish.

## 7. Appendices

If appendices are necessary, they should be added here.

They may include the sections listed below.

- Conditions and/or user guide, which must include:
  - Conditions / User guide / Operating and maintenance instructions.
  - Details of the regulations applicable to the thesis (when appropriate).
  - Manufacturing or execution programme and plan and/or assembly instructions.
- Dimension or verification calculations.
- Calculations justifying the choice of the solutions adopted.
- Lists of specifications of the materials supplied by the manufacturers.
- Computer listings.
- Plans.

### **APPENDIX III: Final assessment report by the tutor at the collaborating entity**

<https://eebe.upc.edu/ca/enquestes/avaluacio-de-practiques>



## APPENDIX IV: Student satisfaction survey

### SATISFACTION SURVEY OF STUDENTS ON AN EXTERNAL PLACEMENT

DEGREE:.....

MALE  FEMALE

Please answer the questions below. Your feedback is important because it helps us to understand students' needs and interests.

1: Strongly disagree, 2: Disagree, 3: Agree, 4: Strongly agree

	1	2	3	4
Your prior learning helped you to carry out the work.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
The level of the placement was appropriate to the level of your degree (bachelor's/master's).	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
The content of the placement was appropriate to the content of your degree.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
The aims of the work plan were met in the tasks carried out. _____	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
The work carried out was generally satisfactory.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
The guidance and monitoring by the tutor at the collaborating entity were appropriate.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
The reception at the collaborating entity was appropriate.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
The conditions of the working environment on the placement were appropriate. _____	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
The conditions of the agreement (working hours, salary, etc.) were appropriate. _____	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
The guidance and monitoring by the academic tutor were appropriate.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
The functioning of the placement service was satisfactory.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
The experience of carrying out an external placement was satisfactory.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
The information available was appropriate. _____	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

Suggestions for improvement:





## APPENDIX V: Assessment report

Assessment report for curricular placements

Academic year

Semester

Name of the student	
National Identity Document/passport	
Degree	
Academic tutor	
Tutor at the collaborating entity	
Collaborating entity	
Credits enrolled (to be filled in at the secretary's office)	

Mark

FINAL MARK	
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Barcelona, \_\_\_\_\_ 2017

The academic tutor



## APPENDIX VI: Proposals for distinctions for placements

### PROPOSAL FOR AWARDING A DISTINCTION<sup>1</sup>

The academic tutor \_\_\_\_\_

proposes awarding a Distinction to the external placement

Company:

\_\_\_\_\_

Student:

\_\_\_\_\_

and for this reason the following report is attached detailing the merits that justify this special mention (see reverse):

In witness whereof, I sign this proposal in the place and on the date stated below.

Barcelona, \_\_\_\_\_

<sup>1</sup> This document must be submitted with the curricular placement assessment report.

## APPENDIX VII: Management of external placements at the UPC

- They will always be curricular in nature. Optional curricular placements are worth 12 optional ECTS credits in the case of bachelor's degrees (360 hours) and a maximum of 12 ECTS credits in the case of master's degrees. They must be paid placements. The hours and student financial aid are the following:

5 h/week-€175 gross per month, 10 h/week-€350 gross per month, 15 h/week-€525 gross per month, 20 h/week-€700 gross per month.

- These placements must be tutored by a professor/researcher at the basic unit and approved by the coordinator of the degree, who will also act as the academic tutor for the placement. The agreement must be signed by the student, the School, the unit at which the placement is to take place and the competent vice-rector.
- In the case of compulsory curricular placements, which are defined in the report on the degree, the School may exceptionally exempt students from the student financial aid requirement.
- Monitoring and assessment proceed as for any other placement.



## **APPENDIX VIII: Management of external placements for students on the master's degree in Chemical Engineering - Smart Chemical Factories**

Master's degree in Chemical Engineering - Smart Chemical Factories Six optional ECTS credits (180 hours) or 12 optional ECTS credits (360 hours) may be enrolled for, as established by the academic committee of the master's degree. These placement credits may substitute for 6 or 12 ECTS credits of the specialisation, following the established procedure.