

COVID-19: Operational risk assessment for mass testing in schools

Assessment conducted by:	Laura Eddery	Job title:	Principal	Covered by this assessment	Staff, pupils, contractors, visitors, volunteers
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Date of assessment:	January 2021	Review interval:	Half termly	Date of next review:	March 2021
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Related documents	
Trust documents:	Government guidance: Schools Colleges How to Guide Schools and Colleges Training Guide Competency Checklist for Key Roles Sample Quality Checklist Online training and webinars

Risk matrix

Risk rating High (H), Medium (M), Low (L)		Likelihood of occurrence		
		Probable	Possible	Remote
Likely impact	Major: Causes major physical injury, harm or ill-health.	H	H	H
	Severe: Causes physical injury or illness requiring first aid.	H	M	L
	Minor: Causes physical or emotional discomfort.	M	L	L

Areas for concern	Risk rating prior to action (H/M/L)	Control measures	In place? (Yes/No)	Further action/comments	Residual risk rating (H/M/L)

<p>The school is not able to plan and make the logistical arrangements required to facilitate the testing in the time provided</p>	<p>M</p>	<ul style="list-style-type: none"> • The school has been able to utilise time in the first week of term (week commencing 4th January), if required, to put the specified arrangements in place • A Senior Leader has been identified to lead and oversee the school-based testing programme • The school has put in place a quality management system, in line with DfE/NHS requirements, and has a designated Quality Lead who has accountability for quality and risk management of the testing programme. The Quality Lead has a clear escalation and decision mechanism process. • The school has a quality management plan in place prior to the start of the testing that meets the requirements of DfE guidance and includes the following elements: <ul style="list-style-type: none"> • Training • Observation of the testing process • Monitoring • Risk Assessment • Recording and reporting • The school has not been required to put in place testing ahead of pupil return to onsite learning. Testing is to start from 4th January and guidance, including template communication material and consent forms, have been provided by the Trust and DfE • Mass testing will commence once the correct logistical arrangements have been put in place to ensure a safe and effective testing facility • Testing Staff have been provided with the DfE/NHS training modules and will be followed as required by applicable personnel – detailed further later • Guidance documentation has been provided by the Trust and the DfE / NHS and will be followed in the establishment of the testing programme. • Schools have been provided with full details of the KIT that will be supplied within the NHS Test & Trace deliveries and the Kit that is required to be sourced locally. All required Kit has been secured. • First starter packs of up to 1,000 test kits, along with PPE and PCR tests will arrive at all secondary schools from 8am on 4th January – a member of staff has been identified to be on site to receive the delivery. Further deliveries will be received on 5th and 6th January. 	<p>L</p>	<ul style="list-style-type: none"> • LED/ETA to oversee the school based testing programme. • LED/ETA are both quality leads and are fully aware of all processes. • All the forms for QA are ready and a file set up to file these for evidence. • Training of staff has commenced week beginning 11-1-21. • Certificates to be recorded on a certificate register and all certificates to be kept in OAE Mass Testing folder. • Kits have arrived and any missing parts have been logged with DfE. 	<p>L</p>
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<p>The school does not have a suitable location within their estate to manage testing</p>	<p>M</p>	<ul style="list-style-type: none"> • The school has identified a secure location for the safe storage of new testing kits (with a temperature of between 2°C and 30°C) and for the separate storage of clinical waste prior to collection. • The school has identified a testing location that meets the minimum space requirements. The room can accommodate testing bays and maintain social distancing requirements for all movements within the room, including the integration of a one-way system of movement for those attending testing (incorporating separate entrance and exits). Layout Options, as detailed within the NHS guidance document, will be used. • The location identified for testing has been calculated to have sufficient capacity to facilitate the scheduled program (based upon NHS guidance of 11 tests per testing desk per hour). • The school will facilitate a significant element of Mass Testing prior to all year groups returning to onsite learning so enabling a suitable location to be identified that is not required for timetabled learning. • The school will facilitate weekly routine testing for staff during non-timetabled core hours and close contact serial testing prior to the start of timetabled lessons, so enabling a suitable location to be identified that is not required for timetabled learning. 	<p>Y</p>	<ul style="list-style-type: none"> • Currently stored in the BM office. • Testing location is the main hall which allows for a one way system and social distancing. • Routine testing for staff on Wednesday and Thursday mornings. • Testing of the CW/V students in school will be set up. 	<p>L</p>
<p>The school is not able to identify suitably trained and sufficient staff to undertake the testing roles required</p>	<p>M</p>	<ul style="list-style-type: none"> • A Senior Leader has been identified to lead and oversee the school-based testing program to enable them to direct staff accordingly. • Schools will facilitate a significant element of mass testing prior to all year groups returning to onsite learning, so enabling pastoral and support staff not required to support either onsite or remote learning to support the testing program. • The required testing roles identified by the NHS to support the testing program will be allocated to staff. Staffing will be adequate to undertake the program safely. • The small team required for the testing has been identified without the need to divert teaching staff from learning. • The testing team is made up of volunteers recruited from non-teaching staff or from the school community as a supporting 3rd party workforce. Testing roles will be allocated in line with DfE/NHS guidance to ensure identified responsibilities are with school staff only. • Where existing staff agree to undertake a testing role checks are made to ensure this is in line with agreed terms and conditions of employment. • Screening/risk profiling of staff and volunteers on the testing team is undertaken to ensure suitability for the role (e.g., age, underlying health conditions, vulnerable family members). • Staffing levels are sufficient to allow breaks for staff to reduce risk of errors due to fatigue. 	<p>Y</p>	<ul style="list-style-type: none"> • LED/ETA will oversee the programme. • Testing will be the current CW/V students in school and we will await further guidance on mass testing of all students on their return to school. • Roles have been allocated to staff, we have more staff than required so we can have two teams of staff. • Staffing is from volunteers from the support staff and invigilators. • Two teams of invigilators. 	<p>L</p>

		<ul style="list-style-type: none"> • All testing staff will either be DBS checked, through their school roles or work under direct supervision. Pupils will be supervised at all times by DBS cleared staff. • Additional remote logistical support is provided, as appropriate, by the Trust, Local Authority, NHS, DfE and Army. • The school will contact the RSC regional delivery directorate, in consultation with the Trust, if additional support is required from the allocated 1,500 military personnel identified for in-person support. • Additional resources of £15 per pupil have been identified by the DfE and will be accessed as required in line with the published DfE criteria. • The rapid testing type used requires low technical skills but is supported with training modules and guidance documentation from the DfE/NHS. • Prior to starting testing, all staff with roles will be specifically trained for the role they will execute using DfE/NHS resources via the online training and assessment platform, that has been provided in line with stated requirements. • Only staff who have passed the assessments will be permitted to commence testing. A record of testing staff and their passing of the required modules will be kept by the school. • After the completion of training testing staff are allowed time to practice onsite using the testing devices provided. • The DfE Competency Assessment has been completed for all staff roles to ensure their effective operation of the criteria within their role. Any areas of concern have been addressed with a review date set. The Assessments are filed and securely stored. 		<ul style="list-style-type: none"> • Staff who could be vulnerable will be back up in case of staffing problems. • All test staff are DBS checked through school. • Contact will be made with RSC if required. • All staff have been provided with the link for the training and will complete this and hand in the certificates to be kept in the OAE MASS Testing folder. • Records of staff who have passed the training is in the OAE Mass testing folder. 	
<p>Contact between subjects increasing the risk of transmission of COVID 19</p>	<p>M</p>	<ul style="list-style-type: none"> • Asymptomatic: all subjects are to be advised in advance not to attend if they have any symptoms of COVID 19 or live with someone who is showing symptoms of COVID 19 (including fever and/or new persistent cough) or if they have returned within 14 days for a part of the world affected by the virus or have been in close contact with someone who is displaying symptoms. • Face masks: signage reminding attending subjects to be displayed at the entrance to buildings and testing rooms • Face coverings/masks to be worn by subjects at all times whilst on the premises except for brief lowering at time of swabbing • Requirement to wear face covering/mask to be reminded to all subjects as they enter the testing room • Compliance with wearing face covering/mask to be visually checked throughout school • Hand hygiene: all subjects to use hand sanitiser provided on arrival and adherence to this enforced by reception and testing assistants • Social distancing: 2m social distancing to be maintained between subjects with measured floor markings in place and verbal reminders from supervising staff 	<p>Y</p>	<ul style="list-style-type: none"> • All staff and students have been advised not to attend if they have any symptoms of COVID 19. • All signage in place. • Face coverings to be worn at all times except for the subject completing the test. • Hand sanitiser will be available and the registration assistant will remind everyone to use this. • Floor markings are on the floor and reminders 	<p>L</p>

		<ul style="list-style-type: none"> • One way flow of subjects through the building and testing room to be in place • cleaning: regular cleaning of testing rooms including wipe down of all potential touch points in accordance with PHE guidelines 		of social distancing in place.	
Contact between subjects and staff increasing risk of transmission of COVID 19	M	<ul style="list-style-type: none"> • See above 	Y	Subject passes the swab to the processor and places it in the test tube. Processor will be in full PPE. All other staff should remain 2 meters from subjects.	L
Contact between subjects and sampler increasing risk of transmission of COVID 19	M	<ul style="list-style-type: none"> • See above 	Y	Subject passes the swab to the processor and places it in the test tube. Processor will be in full PPE. All other staff should remain 2 meters from subjects.	L
Contact between subjects and test assistant increasing risk of transmission of COVID 19	M	<ul style="list-style-type: none"> • See above 	Y	There should be no contact between the test assistant and the subject. A 2m distance should be kept at all times. If close contact does happen and the test is positive that person will have to self isolate.	L
Contact between samples and sample testers increasing risk of transmission of COVID 19	M	<ul style="list-style-type: none"> • PPE to be provided and worn in line with DfE guidance for each role • Training to be completed on role and how to undertake • Online competency test taken before commencing role • Weekly competency checks undertaken by Supervisor 	Y	Full PPE has been provided along with training on how to put this on and take it off. A log this training has been completed will be kept. Weekly competency checks by supervisor will be done and recorded.	L

<p>Incorrect result communication</p>	<p>M</p>	<ul style="list-style-type: none"> • 2 identical bar codes provided to subject at reception desk • The subject registers their details to a unique ID barcode before conducting the test • Barcodes attached by trained staff at testing bay • Barcodes checked for congruence at the processing desk and applied to LFD 	<p>Y</p>	<ul style="list-style-type: none"> • All barcode checking will follow a process to reduce error. 	<p>L</p>
<p>Damaged barcode, lost LFD, failed scan of barcode</p>	<p>M</p>	<ul style="list-style-type: none"> • Rule based recall of subjects who have not received a result within 2 hours of registration • Subjects called for retest 	<p>Y</p>	<ul style="list-style-type: none"> • Any failure of the barcode or test and the subject will be retested. 	<p>L</p>
<p>Extraction solution which comes with lab test kit contains the wrong components</p>	<p>L</p>	<ul style="list-style-type: none"> • PPE: nitrile gloves which meet regulation (EU) 2016/425 to be used at all times when handling the extraction solution. Safety glasses with side shields which are tested and approved under appropriate government standards to be worn at all times when handling the extraction solution. Plastic aprons to be worn to protect the body from splashes or spillages • Environmental: do not let the product enter drains • Spillages: wipe surfaces which the solution has been split on and suppose of cleaning material in line with the waste disposal procedure • Do not use if the solution has expired • Training completed in handling the solution and good lab practice. Adhere to guidelines in these training procedures to prevent improper handling • Follow procedures provided by Innova to mitigate against inhalation, skin contact or ingestion • Tests to be stored in a secure location 	<p>Y</p>	<ul style="list-style-type: none"> • The processors who are the people who will handle the extraction fluid will be in full PPE and use nitrile gloves that meet the standard. • Product will be placed in the correct waste bag and spillages will be cleaned and placed in the correct waste bag. • Training will be completed and a log of this alongside the certificate will be kept in the OAE Mass testing folder. • Tests to be stored in the BM office for the current time. 	<p>L</p>

<p>The school has no legal right to undertake onsite testing and may be liable to legal challenge</p>		<ul style="list-style-type: none"> ● All pupil, parent and staff communication has clearly communicated the legal position of the testing programme. ● The sharing of health data under the testing program is being facilitated within Safeguarding powers under Section 175 of the Education Act 2002. This is referred to within the Trust Privacy Notice and DfE Testing Program Privacy Notice that has been made available to pupils, parents, and Staff. A copy of this is available for viewing at the testing location reception. ● The testing program is recommended and supported, but not mandated. ● Pupils and staff will not be required to participate in the Mass Testing program. ● Staff will not be required to participate in the Weekly Routine Testing program. ● Pupils and staff will not be required to participate in the Close Contact Serial Testing program but may instead be required to self-isolate and not attend onsite teaching for 10 days after identification as a close contact. ● Testing will not be undertaken on pupils or staff without their consent. ● All pupils aged 16 years and under who are tested will also be required to have parental or legal guardian consent. ● Tests will be self-administered, under adult supervision, to a participant's own throat and nose. ● Specific arrangements have been put in place for children with SEND to mitigate risk of harm through parental or legal guardian consent for adult assistance. ● Positive test results will be communicated individually in a location that provides privacy to pupils and staff. ● Positive test results will also be communicated to the parents or legal guardians of those aged 16 or under. ● Guidance on safe travel and additional precautions (regarding self-isolation, further testing, and family access to benefits) will be provided to those testing positive. ● During the testing process anonymity will be provided through digital registration and the use of barcodes against samples. Positive tests will be matched against the digital record and known only to the COVID-19 Coordinator, Registration Assistant and Results Recorder. These roles are all required to be School staff and not 3rd party workforce. ● The use of barcodes and the following of guidance regarding their correct use will prevent the miscoding of samples and results. ● All electronic and paper record Personal Data associated with testing will be destroyed after 14 days, in line with Trust Data Protection policy requirements. 		<ul style="list-style-type: none"> ● All relevant paperwork has been shared with staff and students. ● We encourage all staff and students to take part in the testing but it is not mandatory. ● If a person is a close contact and does not want to take part in the serial testing they must self isolate. ● Parental consent has been requested for those under 16. ● Positive tests will be communicated in private to the student or staff; they will then be isolated until they can go home and a PCR test will be recommended. ● All electronic paperwork will be destroyed after 14 days. 	
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