

RISK ASSESSMENT – Lateral Flow Testing (v2 - February 2021)

Title:	Lateral Flow Testing - Detailed Risk Assessment – 2021			
School	Nailsea School		Number of staff/students:	1036 students
Name of assessor:	C Perry	Assistant Business Manager	Date of Assessment:	4 January 2021
Review: (To take place sooner should a significant change/incident occur or instructions from Government change)	<p>As and when required following any changes to Government instructions on LFT testing</p> <p>Reviewed 16/01/21</p> <p>Reviewed 26/02/21</p>			

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Section 1

BACKGROUND AND CONTEXT:

This risk assessment has been developed with reference to the NHS Test and Trace COVID-19 National Testing Programme How to Guide: Rapid Testing in Schools and Colleges (30 December 2020). It should be read in conjunction with this document and other material available in the DFE Portal:

https://drive.google.com/drive/folders/1jYv0MjFyllbzgPn_1S10OuRgfrj_b5_P

referenced within this guide. It should be noted this portal is being regularly updated by the DFE.

Lateral Flow Device Testing

Staff and students will be tested using a validated Lateral Flow Device. Up to a third of individuals who test positive for COVID-19 have no symptoms at all and can therefore spread it unknowingly, hence, why the testing of people without symptoms is vital. Identifying those individuals will reduce the spread of this virus and save lives. This is what is known as 'mass testing'.

In validation studies conducted by Oxford University and Public Health England, this method of testing was shown to be as accurate in identifying a case as a PCR test (99.8% specificity). The tests have lower sensitivity, but they are better at picking up cases when a person has higher viral load, hence the need to test frequently. When used in combination with other measures such as Personal Protective Equipment (PPE), washing hands regularly and social distancing, these tests further reduce the risk of transmission.

Lateral Flow Device testing (LFD) has been offered to all students (twice with a 3-5-day gap between tests) and staff (at least weekly) that have been on site since the start of term 3. From w/c 1 March 2021 staff will be provided with home testing kits to complete their testing at home. These kits will be provided to pupils after they have completed 3 Lateral Flow Tests at school.

All students will be required to carry out a Lateral Flow Test before being allowed to attend on-site lessons if they test negative, these tests will commence from 1 March 2021 and lessons will commence 8 March 2021. Two subsequent tests will be carried out at 3-5 day intervals to ensure students are correctly testing.

It is recognised that some pupils will have complex needs whereby they will either require additional support to administer a Lateral Flow Test or completion of the test is unrealistic and/or an unnecessary cause of distress. Parents may attend to assist with the testing.

Schools are required to recruit their own workforce to undertake the testing process. Definitions for the roles required for this workforce are set out in the Training Guide for Schools and Colleges. Schools are required to recruit the following roles from their existing workforce: COVID-19 Coordinator; Registration Assistant; Results Recorder; Cleaner. The following roles may be recruited from the existing workforce or a third party workforce (agency, volunteers etc.): Team Leader/Quality Lead; Processor; Test Assistant. There are mandatory training requirements for each role.



Section 2

What is the Task/Activity or Environment you are assessing?	What Hazards are present or may be generated? (Use a row for each one identified)	Who is affected or exposed to hazards?	What Severity of Harm can reasonably be expected? (See Table 1)	What Precautions (Existing Controls) are already in place to either Eliminate or Reduce the risk of an accident happening?	What Likelihood is there of an accident occurring? (See Table 1)	What is the Risk Rating ? (See Table 2 and 3)
2.1 ENGAGEMENT IN THE PROCESS						
Periodic testing of staff/ students	Member of staff or student does not participate in periodic testing (eg: weekly staff test or test before returning to school)	All members of school community		<p>Participation is voluntary for the programme and active consent is required by either staff, students (16+) or their parents/carers as appropriate</p> <p>If any pupil or staff member does not wish to consent to take part in testing they will still be able to attend unless they develop symptoms or are required to self-isolate because a member of their household is waiting a test result or has tested positive</p> <p>Tests will be offered to other professionals associated with the school should they wish to be involved.</p> <p>Staff who have been vaccinated should continue to carry out Lateral Flow Testing at home.</p> <p>Staff and students who have received a positive PCR test are exempt from doing a lateral flow test within 90 days of a positive test. Should they wish to take a test then if a positive result is returned they will be required to self-isolate for 10 days or longer if symptomatic. These individuals are still required to self-isolate if they are identified as a close contact of a positive case, even if this is within the 90 day window.</p>		Medium



Testing arising from serial contact tracing	Non participation	All members of school community		People who decline to participate in serial contact tracing will be required to follow usual national guidelines and are legally obliged to self-isolate according to advice given by the school or NHS Test and Trace service		Low
	Inability to participate (testing not available at weekend)	All members of school community		Pupils and staff who are close contacts of a positive case should repeat daily tests for 1 week from last date of contact. If the week elapses on a non-school day, they must isolate until they can test one final day on the following Monday. No testing will be done on weekends and individuals will need to isolate on the Saturday and Sunday		Low
2.2 SITE SET UP						
Storage of test kits	Deterioration of the tests due to storage at wrong temperature. Loss, damage or theft of testing materials.	All members of school community		Secure area allocated for storage of testing kits and PPE according to instructions. Kits should be stored at room temperature (<30 degrees) – not in direct sunlight and not in a fridge or freezer		Low
Arrangements for social distancing, face coverings etc. during testing process	Non-compliance leads to spread of coronavirus.	All members of school community		<p>Face masks: Compliance with wearing of face covering/mask of all subjects in line with COVID-19 Risk Assessment. Removal for testing as instructed by testing staff</p> <p>Hand hygiene: All individuals to use hand sanitiser in line with COVID-19 risk assessment. Instructions on use during testing process to be given by testing staff</p> <p>Social distancing: Two metre social distancing to be maintained in line with COVID-19 risk assessment. A one-way flow of subjects through the testing area is to</p>		Medium



				<p>be initiated and maintained at all times. Compliance with this is to be ensured by testing staff</p> <p>Cleaning: Regular cleaning of the site including wipe down of all potential touchpoints is accordance with PHE guidance and COVID-19 risk assessment. Additional measures on continual cleaning of testing area in line with NHS guidance on Lateral Flow Testing sites</p>		
Test site set up		Testing workforce		<p>Testing site to be set out according to the COVID-19 Schools and Colleges Handbook:</p> <ul style="list-style-type: none">• Test site flooring is non-porous and area cleanable with approved cleaning product• Site well lit; good airflow and no recirculation of air• Ambient temperature to be 15-30 degrees C for the lateral flow devices to operate• Registration desk at the first point where the individual being tested would enter the test site• One-way direction of travel for pupils or staff being tested.• Testing stations will have a processing desk in close proximity. Recording desk to be located in close proximity to processing desk.• Clear segregation to be in place between swabbing and processing area. Signage/tape in place to indicate that those being tested must not enter the processing area.		Low



				<ul style="list-style-type: none">Waste disposal arrangements will be in place with a clinical waste contractor		
Buffer solution used in test processing. COSHH	Injury resulting from contact with solution. Eg: spillages, splashes etc.	All members of school community		<p>Extraction solution which comes with the lab test kit contains the following components: Na_2HPO_4 (disodium hydrogen phosphate), NaH_2PO_4 (sodium phosphate monobasic), NaCl (Sodium Chloride).</p> <p>These components do not have any hazard labels associated with them, and the manufacturer states that there are no hazards anticipated under conditions of use as described in other product literature. This is the case for exposure to: eye, skin, inhalation, ingestion, chronic toxicity, reproductive and developmental toxicity, carcinogenicity, and medical conditions aggravated by exposure</p> <p>PPE: nitrile gloves which meet the Regulation (EU) 2016/425 to be used at all times when handling the extraction solution. Face visor or 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. Approved plastic aprons to be worn to protect the user from splashes or spillages</p> <p>Environmental: Product to be disposed of in line with manufacturer's instructions and not through drains</p> <p>Spillages: wipe surfaces which the solution has been spilt on, and dispose of cleaning material in line with the waste disposal procedures described below</p> <p>Solution will not be used if it has expired</p> <p>Training to be provided in handling potentially biohazardous samples, chemicals and good processing</p>		Low



				<p>practice. We will adhere to guidelines in these training procedures to prevent improper handling</p> <p>Procedures on the MSDS form provided by Innova to mitigate against inhalation, skin contact or ingestion of these chemicals to be followed</p>		
Waste disposal		All members of school community		All waste will be placed with general waste (updated from DFE 24/02/21)		Low
2.3 WORKFORCE						
Workforce requirements	<p>Inadequate training and supervision of staff leads to:</p> <p>Transmission of the virus</p> <p>Injury or distress to participants/colleagues</p> <p>Inaccurate test results</p>	All members of school community		<p>Only existing school staff to be used in testing process</p> <p>Staff involved to complete mandatory training. Records to be retained.</p> <p>Supervision from quality assurance lead.</p> <p>Walk through to be provided before starting the process.</p> <p>Opportunities for workforce involved to review process/ update training as required</p> <p>Use of competency matrix for key roles</p> <p>Quality Management Plan to be instigated (See DFE Portal for updates)</p>		Low
	Lack of PPE or inappropriate use of PPE.	Testing workforce		PPE provided by DFE to be used according to requirements defined in NHS training modules. If correct PPE is not available testing will not take place		Medium



				<p>All staff to complete training module: Infection Prevention and Control which includes information on correct donning and doffing of PPE</p> <p>Posters available in test site to remind workforce of correct use and requirements.</p> <p>PPE to be disposed of in medical waste bins</p>		
	Injury whilst manual handling equipment/ furniture	Testing workforce		Movement of heavy items eg: tables, partitions, testing materials to be carried out by staff who have received manual handling training		Low
	Contamination of personal items welfare items etc. Dehydration of the testing workforce.	Testing workforce		<p>Staff advised that no personal items to be bought into test site, including food and drink. Disposable water glasses/bottles may be provided in a dedicated area to support hydration during a long testing session but should only be taken after removing PPE and proper handwashing. All disposables to be discarded before leaving test area</p> <p>All PPE must be removed before leaving the testing area including visits to the toilet</p> <p>Face coverings (not PPE used in testing area) to be worn in line with COVID-19 risk assessment</p>		Low
	Transmission of the virus leading to ill health or potential death	All members of school community		Segregation of pupils involved in serial contact testing on school transport where possible		Medium
Staff welfare	Student or member of staff with symptoms of coronavirus arrives at school. Potential to infect others	All members of school community		All subjects will 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 a fever and/or new persistent cough) or if		Medium



				they have returned within 10 days from a part of the world affected by the virus or have been in close contact with someone who is displaying symptoms		
2.4 TESTING PROCESS						
School transport	Transmission of the virus leading to ill health or potential death	All members of school community		Segregation of pupils involved in serial contact testing on school transport where possible		Medium
Arrival at school prior to test	Student or member of staff with symptoms of coronavirus arrives at school. Potential to infect others	All members of school community		<p>All members of the school community will be advised in advance not to attend if they</p> <ul style="list-style-type: none"> • have any symptoms of COVID 19 • live with someone who is showing symptoms of COVID 19 (including a fever and/or new persistent cough) or is awaiting a PCR result • have returned within 10 days from a part of the world affected by the virus • have been in close contact with someone who is displaying symptoms <p>Parental consent will have been sought and received before students under 16 can be tested. Students over 16 can give their own consent</p>		Medium
	Transmission of virus as a result of poor social distancing etc	All members of school community		<p>Full instructions re: social distancing and testing process provided to all participants prior to arrival at site.</p> <p>Prior to registration students to wait 2m apart outside testing area wearing face coverings in line with COVID-19 risk assessment</p>		Medium



				<p>Staggered arrival times and provision made to separate bubbles</p> <p>Supervision from school staff in place</p>		
<p>Welcome & registration</p>	<p>Misuse of child's data</p> <p>Testing without parental consent or consent of staff member</p>	<p>Test subject (pupil or staff)</p>		<p>Parents/carers, students and school staff to have access to Privacy Notice describing how their data will be used</p> <p>Test subject will not be permitted to enter testing area until all consents have been checked by Registration Staff</p> <p>Students under 16 will be pre-registered to reduce hold-up. Staff and students over 16 can register at reception desk</p> <p>Reception staff will confirm name and record on sheet then attach 1 unique ID Barcode beside name handing other barcodes to individual to take to testing bay</p> <p>If the individual at any point is not willing to participate in testing then that choice will be respected even if the parent or legal guardian has given consent</p>		<p>Low</p>
<p>Sample taking</p>	<p>Injury or distress to pupil during the swabbing process (Those able to self-swab)</p>	<p>Test subject (pupil or staff)</p>		<p>Testing Assistant to give advice on how to conduct test correctly as per NHS training guidelines including:</p> <ul style="list-style-type: none"> • removing of face covering • blowing of nose • use of hand sanitiser • how to hold swab • what parts to swab (throat & nose) • inserting test swab into testing receptacle • replacing of face covering and use of hand sanitiser before leaving test bay 		<p>Medium</p>



				<p>Other school staff may also provide verbal support providing they have undertaken the relevant training.</p> <p>Instructions sheet to be provided in each swabbing area. Instructions, social stories, walk through of testing area etc may be provided in advance to alleviate anxiety etc.</p> <p>Mirror provided to assist with self-swabbing</p> <p>Staff trained to deal with potential issues eg: removal of nose piercing</p> <p>Staff will NOT carry out swabbing</p> <p>Where staff already supporting pupils (eg SEN students) have received suitable training they will support students in administering the swabs.</p> <p>Ideally a combined nose and throat swab should be taken, however, a student may find it difficult to take a throat swab due to their having difficulty in understanding instructions, needing to keep their mouth open during the period of swabbing or their having a strong gag reflex. In such cases, where a combined nose and throat swab is not possible, a nose swab from both nostrils can be taken. Similarly, if for some reason a nasal swab is not feasible, a throat swab alone will suffice</p>		
	<p>Injury or distress to pupil/staff during the swabbing process (Those not able to self-swab)</p>	<p>Test subject (pupil or staff)</p>		<p>Trained person to support swabbing. Students may have a parent present to assist (eg SEN students), this must be pre-arranged</p>		<p>Medium</p>



	<p>Additional source of potential contamination to the school community</p> <p>Injury to pupil during swabbing process (parent not trained)</p>			<p>In certain cases parent may need to be present to swab their child, in such cases trained testing staff will give guidance in line with that given to those self-swabbing</p> <p>Suitable measures in line with the schools COVID-19 risk assessment for visitors will be used to manage the infection risk to staff and students</p>		
	<p>Use of testing bay by consecutive individuals' leads to contamination.</p>	<p>All members of school community</p>		<p>Subject to sanitise their hands on entry and leaving test cubicle/area</p> <p>Wipes to be provided to test subjects to clean down mirrors and areas that they have touched whilst in the cubicle.</p> <p>Bowl in cubicle for waste</p> <p>Testing assistant wearing correct PPE to clean each testing bay and associated equipment between use</p>		<p>Low</p>
<p>Sample Transport</p>	<p>Contact with sample</p> <p>Contact between subjects and staff increasing the risk of transmission of COVID19:</p>	<p>Test subject (pupil or staff)</p>		<p>Prior to cleaning testing bay testing assistant wearing correct PPE to transfer sample to processing station in tray supplied to prevent contamination</p> <p>Signage/Tape indicating processing area which must only be entered by those qualified to do so wearing the correct PPE</p>		<p>Low</p>
<p>Sample processing and analysis</p>	<p>Contact between subjects and staff increasing the risk of transmission of COVID19:</p>	<p>All members of school community</p>		<p>Access to area restricted to processing and recording staff only. All staff to use and wear PPE as per NHS training module (eg change of gloves between touching samples with hands)</p> <p>Processing of samples to be carried out following the process set out in the NHS training module and ONLY</p>		<p>Low</p>



				<p>conducted by those staff who have completed relevant NHS training module</p> <p>Quality control measures in place as described in competency framework</p> <p>Processors to record time on testing plate and place on recorders work space</p>		
Recording Process and disposal of sample	<p>Cross contamination of samples.</p> <p>Contamination of Recorder from samples</p>	Test subject (pupil or staff)		<p>To ensure correct results sample must be left 30 minutes (no longer than this) to confirm a negative result. Positive results may be present after 20 minutes</p> <p>Recorders to monitor time using same clock as used by processor</p> <p>Recorder to confirm result to NHS Track & Trace using school supplied phone and barcode on Lateral Flow Device</p> <p>Processors to use tongs when handling samples to avoid touching with gloves</p> <p>Samples to be disposed of in medical bin (yellow bag)</p>		Low
Incorrect result communication	Wrong samples miscoding of results	Test subject (pupil or staff)		<p>Individuals are registered by reception using a unique ID barcode before conducting the test</p> <p>Barcodes are attached by processor to Lateral Flow Device before activating sample</p>		Medium
Damaged barcode, lost LFD, failed scan of barcode	Orphaned record on registration portal & No result communicated to individual.	Test subject (pupil or staff)		Individuals contacted for a retest		Low



2.5 MANAGEMENT AND COMMUNICATION OF RESULTS						
Reintegration of pupils into school	Potential for infected person to come into contact with other individuals.	All members of school community		<p>Students will not be permitted to attend on-site lessons on the day of their first Lateral Flow Test, they must leave the site and return home immediately after carrying out the test.</p> <p>For second and third tests students that are taking on-site lessons will be collected from their lesson for these tests. At the end of the third test they will be issued with home testing kits.</p>		Low
Management of results	Failure to respond to positive LFT means that a pupil/ staff member who potentially has coronavirus comes into contact with the school community.	All members of school community		<p>Arrangements will be made for anyone with a positive LFT to isolate and leave the premises (pupils to be collected by a parent/carer) and take a confirmatory PCR test. (NB: Parent/carer will be informed of result via an email from NHS test and trace)</p> <p>The school will take proactive action to identify other members of the school community who may have been in contact with the individual and inform them of their options (eg 7 day testing regime)</p> <p>To enable the school to track results A COVID-19 Test Register will be set up (this is mandatory), this will be retained for a minimum of 14 days and will be securely destroyed within 1 month of the testing programme ending. This is to comply with data protection law.</p>		Medium

Section 3

Action plan

What is the Hazard you need to Control? (medium to high from the risk rating above)	What additional precautions do you need to either eliminate or reduce the risk to an acceptable level?	Who is responsible for implementing these controls?	When are these controls to be implemented (Date)?	When Were these controls implemented (Date)?

Table 1: Definitions

Potential Severity of Harm	Meaning of the harm description	Likelihood of Harm	Meaning of likelihood
Fatal/Major Injury	Death, major injuries or ill health causing long term disability/absence from work.	<i>High (frequent)</i>	Occurs repeatedly/ to be expected.
Serious Injury	Injuries or ill health causing short-term disability/absences from work (over three days absence)	<i>Medium (possible)</i>	Moderate chance/could occur sometimes.
Minor Injury	Injuries or ill health causing no significant long-term effects and no significant absence from work.	<i>Low (unlikely)</i>	Not Likely to occur

Table 2: Risk rating matrix: Potential severity of Harm + Likelihood of Harm = Risk rating

	+ High (Likely)	+ Medium (Possible)	+ Low (Improbable)
Fatal/Major Injury	VERY HIGH Risk	HIGH Risk	MEDIUM Risk
Serious Injury	HIGH Risk	MEDIUM Risk	LOW Risk
Minor Injury	MEDIUM Risk	LOW Risk	No Significant Risk

Table 3: Action required: Key to Ranking and what action to take.

VERY HIGH Risk	STOP ACTIVITY! Take action to reassess the work/activity and apply reduction hierarchy before proceeding.
HIGH Risk	Action MUST be taken as soon as possible to reduce the risks and before activity is allowed to continue.
MEDIUM Risk	Implement all additional precautions that are not unreasonably costly or troublesome and monitor the situation on an agreed frequency.
LOW Risk	Monitor and review your rolling programme.