



### COVID-19 RISK ASSESSMENT (August 2021)

<b>Title:</b>	Implementation of on-site Lateral Flow Testing for staff and students - September 2021			
<b>School:</b>	Nailsea School		<b>Number of staff/students:</b>	1036 students
<b>Name of assessor(s):</b>	D Elliott S Hurlow C Perry	Head Teacher Business Manager Assistant Business Manager	<b>Date of Assessment:</b>	11 <sup>th</sup> August 2021
<b>Review:</b> (To take place sooner should a significant change/incident occur)				

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## Background, Context & References:

This risk assessment has been developed with reference to the NHS Test and Trace COVID-19 National Testing Programme How to Guide: **Rapid Testing on site in settings and Colleges (28 June 2021)**. 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](https://drive.google.com/drive/folders/1jYv0MjFyllbzgPn_1S10OuRgfrj_b5_P) referenced within this guide. We note this portal is being regularly updated by the DFE.

### **NOTE (From updated How To Guide above)**

**From 10 May 2021, the LFD test device kits your setting or college receives for on-site ATS tests will be different. Details of the differences are set out in the one-page information leaflet. Sites should only use 1 brand of device at any one time for the on-site ATS testing (except in exceptional circumstances where students or pupils are unable to nasal swab they should use Innova ATS test kits for throat swab only), to minimise risk of confusion and processing errors.**

**You should plan to begin using the new LFD tests kits for on-site ATS testing from when your current supply of LFD test kits are due to end. For the final day using the current LFD tests (Innova), setting/colleges should allow enough tests to cover the expected cohort plus 10% for voids or unexpected additional participants. The session the next day should start using the new tests. Sites should retain any leftover Innova ATS test kits for students, pupils or staff members who are unable to nasal swab. Please contact the helpdesk on 0800 046 8687 if you have pupils or students who require Innova test kits for use onsite (as they cannot have a nasal swab and cannot be tested at home) and you are running low on stock. In this case the Innova ATS test kit should be used for throat swabbing only. Guidance on how to test using an Innova test kit can be found in the appendix 1 and in the Instructions for Use in the box of the test kit. Kits should be stored in a way that minimises the risk of confusing the test kits where possible. Prior to the introduction of the Orient Gene test kit testing staff should complete the extra Orient Gene training modules (which takes approx. 30 minutes) following link:**

<https://go.tessello.co.uk/TestDeviceTraining/>

### **Lateral Flow Device Testing (updated for return to setting in September 2021)**

Staff, pupils 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. That is why the testing of people without symptoms is vital. Identifying those individuals will save lives. This is what is known as 'mass testing'. In validation studies conducted by Oxford University and Public Health England, they were 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 secondary pupils and staff (twice with a 3-5-day gap between tests) since January 2021. From March 2021 staff and pupils have been provided with home testing kits to complete their test at home.

In September 2021 all secondary aged pupils will be required to complete 2 lateral flow tests at setting at the start of term. settings and colleges have the option to stagger the return to setting and to starting on-site testing up to three days before the start of term. settings and colleges have the flexibility to consider how best to deliver testing on a phased basis, depending on their circumstances and local arrangements. A pupil/student's first test at an on-site (ATS) should be as soon as possible after they arrive at setting or college and they will be allowed to resume face to face learning if they test negative after that first test. If they test positive, they will need to go home and self-isolate in line with government guidance. Their second test should be 3 to 5 days later. If a setting/college decides to test up to three days before the start of term, pupils/students should be sent straight home once they have completed their test

LFD testing will take place on the setting site. Whilst there is some scope for settings to use temporary buildings eg: a marquee this is not recommended as a minimum temperature of 15 degrees C would need to be achieved consistently. Settings 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 settings and Colleges. settings are requires 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 <b>Task/Activity</b> or <b>Environment</b> you are assessing?	What <b>Hazards</b> are present or may be generated? (Use a row for each one identified)	<b>Who</b> is affected or exposed to hazards?	What <b>Severity of Harm</b> can reasonably be expected? (See Table 1)	What <b>Precautions (Existing Controls)</b> are already in place to either Eliminate or Reduce the risk of an accident happening?	What <b>Likelihood</b> is there of an accident occurring? (See Table 1)	What is the <b>Risk Rating?</b> (See Table 2 and 3)
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**2.1 ENGAGEMENT IN THE PROCESS**

Periodic testing of staff/ pupils	Member of staff or young person does not participate in periodic testing (eg: weekly staff test or test before returning to setting)	All members of setting & community	<b>Serious</b>	<p>Participation is voluntary for the programme and active consent is required by either staff, pupils or their parents/carers as appropriate. 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 awaiting a test result or has tested positive.</p> <p>We note that we are also able to offer tests to other professionals associated with the setting should they wish to be involved.</p> <p>We have advised staff who have been vaccinated that they should continue to carry out their Lateral Flow Testing at home.</p> <p>Where appropriate we have advised those staff and pupils who have received a positive PCR test in the last 90 days that they are exempt from testing by both PCR or LFD within 90 days of a positive PCR test unless they develop new symptoms.</p> <p>If individuals choose to take a LFD test after the isolation period for example as part of a workplace or community testing programme, this should only be done after completion of the required self isolation period set out in the NHS stay at home</p>	Low	Low
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				guidance. If they test positive with a LFD test (and confirmatory PCR) they will be required to self-isolate for 10 days or longer if symptomatic.		
<b>2.2 SITE SET UP</b>						
Storage of test kits	Deterioration of the tests due to storage at the wrong temperature. Loss, damage or theft of testing materials.	All members of setting community	Minor	Secure area allocated for storage of testing kits and PPE according to instructions (between approx. 2 degrees C-30 degrees C)	Low	Low
Arrangements for social distancing, face coverings etc. across the site (Test subjects)	Non-compliance leads to the spread of coronavirus.	All members of setting community	Serious	<b>Face masks:</b> To be worn if required by government guidance. (NB could be reintroduced in case of a local outbreak). <b>Hand hygiene:</b> All subjects to use hand sanitiser provided on arrival & adherence to this is enforced by reception staff. <b>Cleaning:</b> Regular cleaning of the site including wipe down of all potential touchpoints is in accordance with PHE guidance.	Medium	Medium
Test site set up		Testing workforce	Serious	Testing site to be set out according to the COVID-19 settings and Colleges Handbook: <ul style="list-style-type: none"> <li>• Test site flooring is non-porous and area cleanable with approved cleaning product</li> <li>• Site well lit; good airflow and no recirculation of air</li> <li>• Ambient temperature to be 15-30 degrees C for the lateral flow devices to operate and 2-30 degrees C for storing them.</li> <li>• Registration desk at the first point where the individual being tested would enter the test site.</li> </ul>	Low	Low

				<ul style="list-style-type: none"> <li>● One-way direction of travel for pupils or staff being tested. If not, space will be provided for those being tested to leave whilst maintaining suitable distance from other test subjects.</li> <li>● Test subject chairs in swabbing bay to be a minimum of 2m apart</li> <li>● Each swabbing area will have a processing desk close by – no more than 1m away. Recording desk to be located close by.</li> <li>● Clear segregation to be in place between swabbing and processing area. Signage is in place to indicate that those being tested must not enter the processing area.</li> </ul>		
Buffer solution used in test processing. COSHH	Injury resulting from contact with solution. Eg: spillages, splashes etc.	All members of setting community	Minor	<p>Extraction solution which comes with the lab test kit contains the following components: <math>\text{Na}_2\text{HPO}_4</math> (disodium hydrogen phosphate), <math>\text{NaH}_2\text{PO}_4</math> (sodium phosphate monobasic), <math>\text{NaCl}</math> (Sodium Chloride). 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><b>PPE:</b> nitrile gloves which meet the 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. Impervious clothing to be worn to protect the body from splashes or spillages.</p>	Low	Low

				<p><b>Environmental:</b> We will not let the product enter drains</p> <p><b>Spillages:</b> wipe surfaces which the solution has been spilt on, and dispose of cleaning material in line with the lab's 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 practice. We will adhere to guidelines in these training procedures to prevent improper handling.</p>		
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### 2.3 WORKFORCE

Workforce requirements	<p>Inadequate training and supervision of staff leads to:</p> <ul style="list-style-type: none"> <li>• Transmission of the virus</li> <li>• Injury or distress to participants/ colleagues</li> <li>• Inaccurate test results</li> </ul>	All members of setting community	Serious	<p>Staff involved to complete mandatory training. Records to be retained. NB this will be revisited if necessary prior to resuming mass testing in September 2021.</p> <p><b>Prior to the introduction of the Orient Gene test kit testing staff must complete the extra Orient Gene training modules (which takes approx. 30 minutes) and can be found on the following link: <a href="https://go.tessello.co.uk/TestDeviceTraining/">https://go.tessello.co.uk/TestDeviceTraining/</a></b></p> <p>Supervision from setting quality assurance lead. 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 checklists for key roles</p>	Medium	Medium
	Lack of DBS check leads to recruitment of unsuitable adults working with	All members of setting community	Serious	<p>DBS checks will be obtained for all adults involved in administering this process. Those without DBS to work under the supervision of a person with DBS until the outcome of the check is received.</p>	Low	Low

	children. Potential for abuse.			Nailsea school have not recruited external staff for testing purposes. All staff have an enhanced DBS check, and are employees of the Trust.		
	Lack of awareness of setting safeguarding protocols puts children and the workforce at risk.	All members of setting community	Serious	Safeguarding (also health and safety/ fire safety/ lockdown) briefing to be provided to the workforce.	Low	Low
	Lack of PPE or inappropriate use of PPE.	Testing workforce	Serious	PPE to be provided by DFE and allocated to the workforce according to requirements set out in settings Handbook. If correct PPE is not available, testing will not take place.  All staff to complete training module: Infection Prevention and Control which includes information on correct donning and doffing of PPE.  Posters are available in test site to remind the workforce of correct use and requirements.  PPE to be disposed of in medical waste bins.	Low	Low
	Injury whilst manual handling equipment/ furniture	Testing workforce	Serious	Movement of heavy items eg: tables, partitions, testing materials to be carried out by staff who have received manual handling training.	Low	Low
Staff welfare	Contamination of personal items, welfare items etc.  Dehydration of the testing workforce.	Testing workforce	Serious	Staff advised that no personal items to be brought into the 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 are to be discarded before leaving the test area.  All PPE must be removed before leaving the testing area including visits to the toilet. Visiting	Low	Low

				<p>staff will be advised of the location of these facilities as part of their site induction.</p> <p>Breaks will be provided and a separate area provided for the workforce to take their breaks.</p> <p>Face coverings (not PPE used in testing area) to be worn in line with setting protocols when accessing wider setting building.</p>		
<b>2.4 TESTING PROCESS</b>						
Arrival at setting prior to test	Student or member of staff with symptoms of coronavirus arrives at our setting. Potential to infect others	All members of setting community	Serious	<p>All subjects will be advised in advance not to attend if they have any symptoms of COVID 19.</p> <p>Parental consent will have been sought and received before the pupil attends testing site.</p> <p>Allocated time slots enable manageable numbers and effective distancing</p>	Medium	Medium
	Transmission of virus as a result of poor social distancing etc	All members of setting community	Serious	<p>Full instructions re: testing process provided to all participants prior to arrival at site.</p> <p>Prior to registration students have to wait outside the main entrance and remain socially distanced.</p> <p>Supervision from setting staff in place.</p>	Medium	Medium
Welcome & registration	Misuse of child's data Testing without parental consent or consent of staff member	Test subject (pupil or staff)	Serious	<p>Consent template to be completed by parent/carer before testing commences.</p> <p>11-15-year olds may self-swab with supervision from an appropriate member of staff ONLY if they have permission from their parent/carer.</p> <p>Those aged 16+ may self-swab without parental permission.</p> <p>Even if the child or young person and/or the parent or legal guardian has given consent, if the individual at any point is not willing to participate in testing then that choice will be respected.</p>	Medium	Medium

				<p>Parents/carers, pupils and setting staff to have access to a Privacy Notice describing how their data will be used.</p> <p>Test subjects will not be permitted to enter the testing area until all consents have been checked by Registration Staff.</p>		
Sample taking	Injury or distress to pupil during the swabbing process (Those able to self-swab)	Test subject (pupil or staff)	Serious	<p>Testing Assistant present to provide verbal support as required. setting staff may also provide verbal support but must undertake relevant training.</p> <p>Instructions provided in each swabbing area. Instructions, social stories, walk through of testing area etc provided in advance to alleviate anxiety etc.</p> <p>Staff trained to deal with potential issues eg: removal of nose piercing. But NOT to carry out swabbing.</p>	Low	Low
	Injury or distress to pupil/staff during the swabbing process (Those not able to self-swab)	Test subject (pupil or staff)	Serious	<p>Trained person to support or carry out swabbing. (Further guidance and support to be provided – see updates on portal)</p>	Low	Low
	Additional source of potential contamination to the setting community.		Serious	<p>If a parent is to swab their child, then we will provide them with guidance on swabbing, like we would do for those self-swabbing.</p>	Low	Low
	Use of testing area by consecutive subjects leads to contamination.	All members of setting community	Serious	<p>Subject to sanitise their hands on entry and leaving the test cubicle/area.</p> <p>Bays cleaned between use</p> <p>Refuse receptacle in cubicle.</p>	Low	Low
Sample Transport	Contact with sample Contact between subjects and staff increasing the	Test subject (pupil or staff)	Serious	<p>Staff to wear PPE as described in settings and Colleges Handbook.</p> <p>Samples to be transferred using receptacles provided.</p>	Low	Low

	risk of transmission of COVID19:			Signage advises that test subjects must not enter the processing area.		
Sample processing and analysis	Contact between subjects and staff increasing the risk of transmission of COVID19:	All members of setting community	Serious	Access to area restricted to processing and recording staff only. All to be wearing PPE as described in the School's and Colleges Handbook. Processing of samples to be completed by staff who have completed the relevant training module ONLY. Processing will be carried out following the process set out in the training. Quality control measures in place as described in competency framework.	Low	Low
Incorrect result communication	Wrong samples miscoding of results	Test subject (pupil or staff)	Serious	3 identical barcodes are provided to the subject at check in. The subject registers their details to a unique ID barcode before conducting the test. Barcodes are attached by trained staff at the sample processing area. Barcodes are checked for congruence at the analysis station and applied to Lateral Flow Device at this station.	Low	Low
Damaged barcode, lost LFD, failed scan of barcode	Orphaned record on registration portal & No result communicated to individual.	Test subject (pupil or staff)	Serious	Subjects are called for a retest.	Low	Low

## 2.5 MANAGEMENT AND COMMUNICATION OF RESULTS

<p>Reintegration of pupils into setting</p>	<p>Potential for infected persons to come into contact with other individuals.</p>	<p>All members of setting community</p>	<p><b>Serious</b></p>	<p>When the testing is part of a mass testing programme, individuals can return to regular settings or college activities provided that they have a negative test result.</p> <p>Where students return to setting before the start of term in September 2021 solely for the purpose of carrying out a LFT, they must leave the site and return home immediately after carrying out the test.</p>	<p>Low</p>	<p>Low</p>
<p>Management of results</p>	<p>Failure to respond to positive LFT means that a pupil/ staff member who potentially has coronavirus comes into contact with the setting community.</p>	<p>All members of setting community</p>	<p><b>Serious</b></p>	<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; however our setting will need to take proactive action in the meantime).</p> <p>A COVID-19 Test Register will be set up (this is mandatory). This will enable the setting to track results. We will use this so that we know when someone has tested positive or gets a void result. This will allow us to ensure that people self-isolate or are retested.</p> <p>The COVID -19 Test Register 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>	<p>Medium</p>	<p>Medium</p>

**Table 1: Definitions**

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

**Table 2: Risk rating matrix: Potential severity of harm + Likelihood/ probability of Harm = Risk rating**

	High (Likely/Probable)	Medium (Possible)	Low (Unlikely)
Fatal/Major Injury	VERY HIGH	HIGH	MEDIUM
Serious Injury	HIGH	MEDIUM	LOW
Minor Injury	MEDIUM	LOW	LOW

**Table 3: Action required: Key to RISK ranking and what action to take**

<b>VERY HIGH</b>	STOP ACTIVITY! Take action to reassess the work/activity and apply reduction hierarchy before proceeding.
<b>HIGH</b>	Action MUST be taken as soon as possible to reduce the risks and before activity is allowed to continue.
<b>MEDIUM</b>	Implement all additional precautions that are not unreasonably costly or troublesome within an agreed timeframe. Reduce risk to a tolerable level.
<b>LOW</b>	Monitor and review your rolling programme.