

## SCHOOL RISK ASSESSMENT COVID-19 National Testing Programme



This risk assessment must be read and used in conjunction with the schools opening arrangements during COVID-19 general risk assessment and tailored to reflect specific arrangements within school.

### PART A. ASSESSMENT DETAILS:

**Area/task/activity:** Implementation of the COVID-19 National Testing programme in Schools

**Location of activity:** State Testing Location

<b>School name: Address &amp; Contact details:</b>	Jan Marshall	<b>Name of Person(s) undertaking Assessment:</b>	Jan Marshall
		<b>Signature(s):</b>	
<b>Headteacher (Name/Title):</b>	Jane Galbraith	<b>Date of Assessment:</b>	05/01/2021
<b>Signature:</b>		<b>Planned Review Date:</b>	Weekly with testing operatives and provision manager
<b>How communicated to staff:</b>	Staff Briefing	<b>Date communicated to staff:</b>	05/01/2021

### PART B. HAZARD IDENTIFICATION AND CONTROL MEASURES:

<b>List of significant hazards</b> (something with the potential to cause harm)	<b>Who might be harmed</b>	<b>Type of harm</b>	<b>Existing controls</b> (actions already taken to control the risk - include procedure for the task/activity where these are specified)
Changes to official COVID-19 guidance and advice	Staff, pupils, visitors, contractors, household members	Transmission of the virus leading to ill health or potential death	<ul style="list-style-type: none"> <li>• School regularly refers to official advice from the DfE, PHE, HS&amp;Q and HR; <ul style="list-style-type: none"> <li>○ <u>Coronavirus (Covid-19): guidance for schools and other educational settings</u></li> <li>○ <u>LCC Schools HR guidance</u></li> </ul> </li> </ul>

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			<ul style="list-style-type: none"> <li>○ <u>LCC Health &amp; Safety COVID-19 web page</u></li> <li>● Headteacher or other senior person keeps up to date with <u>official COVID-19 Guidance</u> and informs employees/school arrangements as required;</li> <li>● The content of this risk assessment is based on the NHS COVID-19 National Testing Programme, <u>Schools and Colleges Handbook</u> and the <u>Clinical Standard Operating Procedure for schools</u>.</li> <li>● School holds relevant and update to date guidance in the Covid-19 folder on the shared network</li> </ul>
Insufficient resources to administer testing arrangements	Staff, pupils, visitors, contractors, household members	Transmission of the virus leading to ill health or potential death	<ul style="list-style-type: none"> <li>● School has considered the resources required to deliver the testing programme and has sought additional support from the NHS and LCC H&amp;S Team where necessary</li> <li>● School has 570 pupils and 80 staff involved in the testing programme;</li> <li>● The following roles have been allocated: <ul style="list-style-type: none"> <li>○ Covid Coordinator/Team Leader – Ali Wilcock</li> <li>○ Quality Lead – Jan Marshall</li> <li>○ Queue Coordinator –</li> <li>○ Registration assistant –</li> <li>○ Test assistant – Lisa Wright/Clare Lloyd</li> <li>○ Processing Operative – Lisa Wright/Clare Lloyd</li> <li>○ Results Andron</li> </ul> </li> </ul>
Poor administration and implementation of testing programme	Staff, pupils, visitors, contractors,	Transmission of the virus leading to ill health or	<ul style="list-style-type: none"> <li>● All staff involved in the testing programme are aware of their role and have completed appropriate training as detailed under 5.2 of the SOP (Standard Operating Procedures);</li> </ul>

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	household members	potential death	<ul style="list-style-type: none"> <li>• A Quality Management Plan has been created by the designated Quality Lead as detailed in section 9.2 of the SOP and includes;</li> </ul> <p><b>Training:</b></p> <ul style="list-style-type: none"> <li>○ Knowledge assessment at the end of on-line training (this is done as part of online training);</li> <li>○ A dry run as a team during mobilisation or on first day;</li> </ul> <p><b>Observing testing process:</b></p> <ul style="list-style-type: none"> <li>○ Daily/weekly clinical quality audits;</li> <li>○ Staff competence checks;</li> </ul> <p><b>Monitoring</b></p> <ul style="list-style-type: none"> <li>○ Void rates and invalid tests rates by day and by operator;</li> <li>○ Recording errors;</li> <li>○ Serious incident rates and escalation;</li> </ul> <p><b>Risk assessment</b></p> <ul style="list-style-type: none"> <li>○ Risk and incident management system setting out the management of safety concerns, safety incidents and risk mitigation.</li> </ul>
Unsuitable testing environment	Staff, pupils, visitors, contractors, household members	Transmission of the virus leading to ill health or potential death	<ul style="list-style-type: none"> <li>• The test site is L1 and is separate from the main area of business operations for privacy, safe queue management, and to limit disruption to both testing and 'business as usual' activity</li> <li>• Test queues are managed safely to avoid disruption – not required at this time</li> <li>• The test site has; <ul style="list-style-type: none"> <li>○ Sufficient space for appropriate social distancing;</li> </ul> </li> </ul>

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			<ul style="list-style-type: none"> <li>○ Easy to clean floor and surfaces;</li> <li>○ Resistant, non-absorbent flooring;</li> <li>○ Airflow and ventilation, no recirculation;</li> <li>○ Ambient temperature 15-30 C;</li> <li>○ One-way flow from entry to exit as much as possible;</li> <li>○ Clear access to PPE donning and doffing area;</li> <li>○ Ready access to hand hygiene (soap and water/appropriate 70% alcohol-based hand rub)</li> <li>○ Consideration of the need for privacy for participants to self-administer a test;</li> <li>○ Suitable access and egress taking into consideration disability access, and fire safety regulations. Evacuation routes clearing marked in line with the rest of the building;</li> <li>○ De-cluttered surfaces with no personal or non-essential equipment;</li> <li>○ Enough room for storage;</li> </ul>
Unsuitable site set-up	Staff, pupils, visitors, contractors, household members	Transmission of the virus leading to ill health or potential death	<ul style="list-style-type: none"> <li>● The testing site for school is L1</li> <li>● Testing is conducted on multiple participants in parallel, in separate testing bays (there are 4 bays) using a one-way system;</li> <li>● The school testing site includes a registration area, swabbing bays, swab receiving area, processing area and recording area;</li> <li>● Dedicated test booths are a minimum of 1.2 x 1.2 m in dimension;</li> </ul>

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			<ul style="list-style-type: none"> <li>• Open plan sample testing stations are positioned to maintain 2 metre social distancing;</li> <li>• Items included at each swabbing bay include a table, chair (on request), mirror, laminated instructions, healthcare waste bins (separate bins for chemical e.g. used test kits and PPE/wipes), 70% alcohol-based hand rub dispenser;</li> <li>• The swab receiving area is located on the opposite side of the testing stations from where the Test Assistant can observe up to 5 booths/stations and receive swabs from participants;</li> <li>• The swab receiving area contains extraction fluid, extraction tubes, sterile swabs, healthcare waste bins &amp; disinfectant spray bottle with paper towel/wipes;</li> <li>• There is sufficient flat surface area and adequate lighting at the processing area with sufficient dedicated space for LFD (lateral flow device) timing, reading and recording;</li> <li>• The processing area contains LFD cartridges, extraction solution, extraction tube nozzles, tube racks or equivalent for holding extraction tubes, healthcare waste bins, disinfectant spray bottle with paper towel/wipes, timing clock(s), permanent marker pens &amp; trays to be cleaned with alcohol after each LFD batch has been transferred to the processing results table;</li> <li>• There is a clear division between the swabbing and processing areas. Individuals being tested are not permitted to enter the processing area;</li> </ul>

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			<ul style="list-style-type: none"> <li>The recording area is a separate table where the marked LFDs are collected for scanning and uploading;</li> <li>The recording area contains marked LFD cartridges, healthcare waste bins, disinfectant spray bottle with paper towel/wipes, barcode scanner and scanning device;</li> </ul>
Failure to obtain consent from parents/guardians and staff	Staff, pupils, visitors, contractors, household members	Transmission of the virus leading to ill health or potential death	<ul style="list-style-type: none"> <li>School has issued the standard letter to all staff and pupils explaining the benefits of and arrangements for testing and seeking consent; Letter sent to parents via synergy to students attending school at this time</li> <li>No tests will be administered without appropriate consent;</li> <li>Pupils can withdraw their consent at any point in the testing process;</li> <li>Appropriate records will be kept of any staff or pupils who do not consent to testing;</li> <li>People identified as having been in close contact with a positive case who decline to participate in daily contact testing will be required to follow the usual national guidelines and are legally obliged to self-isolate according to the advice given to them by the NHS Test and Trace service.</li> </ul>
Lack of Personal Protective Equipment	Staff, pupils, visitors, contractors, household members	Transmission of the virus leading to ill health or potential death	<ul style="list-style-type: none"> <li>All staff involved in the testing programme have been provided with appropriate PPE for their role, are aware when to use it, how to don and doff PPE, how to obtain replacements and how to dispose of used PPE safely;</li> <li>Processing operatives and cleaning staff are required to wear disposable gloves, disposable plastic apron, fluid-resistant (Type IIR) surgical mask and eye protection with side shields. The apron, eye protection and mask</li> </ul>

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			<p>should be changed after each *session. The Processing operatives must change gloves between samples;</p> <ul style="list-style-type: none"> <li>All other testing site staff including those involved in queue management, registration and recording are required to wear a fluid-resistant (Type IIR) surgical mask. This must be replaced after each *session;</li> <li>PPE will be changed *mid-session should protective properties become compromised or contaminated from secretions;</li> <li>Cleaners will change gloves and apron after cleaning a spillage;</li> <li>If Results Recorders handle LFD cartridges, they will wear gloves on sessional basis.</li> </ul> <p>*A session ends when a worker leaves the care setting i.e. at a break or end of shift.</p>
Close contact between individuals during the testing process	Staff, pupils, visitors, contractors, household members	Transmission of the virus leading to ill health or potential death	<p><b>Asymptomatic:</b></p> <ul style="list-style-type: none"> <li>All staff and pupils 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 a fever and/or new persistent cough) or if they have returned within 14 days from a part of the world affected by the virus or have been in close contact with someone who is displaying symptoms.</li> </ul> <p><b>Face masks:</b></p> <ul style="list-style-type: none"> <li>Prominent signage is in place reminding all of the requirements to wear face coverings;</li> <li>All individuals are required to wear face coverings/masks on entering the building, queueing for a test, and within the testing area itself except</li> </ul>

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			<p>for brief lowering of their face covering/mask at time of swabbing;</p> <ul style="list-style-type: none"> <li>• Compliance with wearing of a face covering/mask of all individuals will be visually checked by queue managers and sampling staff;</li> <li>• Face coverings are not required for individuals who:               <ul style="list-style-type: none"> <li>○ cannot put on, wear or remove a face covering because of a physical or mental illness or impairment or disability.</li> <li>○ speak to or provide assistance to someone who relies on lip reading, clear sound or facial expression to communicate.</li> </ul> </li> </ul> <p>Staff involved in the testing process will be made aware of those individuals who fall into these categories and will provide additional support if necessary.</p> <p><b>Social distancing:</b></p> <ul style="list-style-type: none"> <li>• Two metre social distancing to be maintained between individuals with measured floor markings in place to ensure compliance in addition to verbal reminders if necessary from queue management and sampling staff.</li> <li>• A one-way flow of pupils and staff through the test site will be maintained at all times. Compliance is monitored by queue management staff.</li> </ul> <p><b>Cleaning:</b></p> <ul style="list-style-type: none"> <li>• Cleaning staff only enter the testing area when testing activity is no longer being conducted unless there is a requirement to clean 'spillages'.</li> <li>• In accordance with NHS guidance 'Cleaning and Disinfection process COVID-19' there is no close contact (within 2m) with other individuals and</li> </ul>



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			<p>disposable gloves and fluid resistant surgical masks type IIR must be worn in all non COVID secure areas by cleaning staff;</p> <p><b>Supplies:</b></p> <ul style="list-style-type: none"> <li>• Staff who are required to top up supplies within test areas will do so at the beginning of each testing session and when no pupils are present.</li> </ul>
Spread of infection from contaminated surfaces within testing area	Staff, pupils, visitors, contractors, household members	Transmission of the virus leading to ill health or potential death	<ul style="list-style-type: none"> <li>• All staff and pupils are reminded of the importance of Infection Protection Control guidance and that regular handwashing and consistent social distancing are key to ensuring safety for all roles;</li> <li>• All individuals to use hand sanitiser provided on arrival as instructed by reception staff;</li> <li>• The cleaning policy under section 12.2 of the SOP is adhered to;</li> <li>• All surfaces that individuals being tested have come into contact with are cleaned and disinfected, including all potentially contaminated and frequently touched surfaces between each individual that is tested;</li> <li>• Disposable cloths or paper roll and disposable mop heads are used to clean all hard surfaces, floors, chairs, door handles and sanitary fittings;</li> <li>• Any cloths and mop heads used for cleaning are disposed into the offensive (tiger bag) waste bin provided;</li> <li>• A documented cleaning regime is in place. This is clearly communicated;</li> <li>• As a minimum frequently touched surfaces are cleaned twice a day one of which is at the beginning or the end of the working day;</li> <li>• Public areas where a symptomatic individual has passed through and</li> </ul>

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			<p>spent minimal time, but which are not visibly contaminated with body fluids are cleaned thoroughly as normal;</p> <ul style="list-style-type: none"> <li>• If an individual handles any equipment (e.g. hand mirror) they are required to disinfect the surfaces with anti-viral wipes themselves;</li> <li>• Computer equipment within the testing site such as keyboard and mouse is cleaned at the start of the day, after each batch of cartridges have been reviewed and uploaded and at the end of the day and if they become contaminated with any form of spillage;</li> <li>• All digital equipment is regularly wiped between batches of tests and at the beginning and end of each session;</li> <li>• The cleaning wipes used meet the requirements indicated in the SOP cleaning policy section 12.2 and are effective against enveloped viruses;</li> <li>• Any trays that are used to move LFDs for recording after reading and marking of results are made from a material that will tolerate being cleaned with chlorine releasing agents at 1000ppm, have straight sides, and smooth.</li> <li>• Furniture and equipment is kept to a minimum (chairs only on request).</li> </ul>
Incorrect use of testing equipment	Staff, pupils, visitors, contractors, household members	Transmission of the virus leading to ill health or potential death	<ul style="list-style-type: none"> <li>• School ensures all staff involved in administering or supervising testing have undergone appropriate training in accordance with the information and advice provided by NHS and Government;</li> <li>• Testing assistant to follow the step by step procedures set out under 7.7.1 of the SOP;</li> <li>• School ensures that all staff and pupils self-administering tests have received appropriate instruction on how to do this correctly and safely;</li> </ul>

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			<ul style="list-style-type: none"> <li>• Under circumstances where a pupil is unable to swab themselves such as due to physical disability or special needs, swabbing arrangements will be discussed with the parent/carer, social worker if appropriate and the pupil to determine the best course of action;</li> <li>• Where there are physical/medical issues or an individual has a very sensitive gag reflex that prohibits the throat swab from being completed successfully, double nasal swabbing can be undertaken;</li> <li>• Under circumstances, where a nasal swab is not feasible (e.g. an individual is prone to nasal bleeds), it is acceptable to swab only the back of the throat without having to do a nasal swab;</li> <li>• In the event that a person being tested vomits, operations at the testing bay will cease and site personnel will follow spillage guidelines before resuming testing at that testing station;</li> <li>• If the swab touches anything other than the tonsils or nostril before or after swabbing it will be invalid and will be placed in the healthcare (chemical) waste container and a fresh swab selected;</li> <li>• Any concerns or injuries are reported immediately and investigated as soon as possible so that arrangements can be put in place to avoid a recurrence.</li> </ul>
Cross contamination of samples	Staff, pupils, visitors, contractors, household members	Transmission of the virus leading to ill health or potential death	<ul style="list-style-type: none"> <li>• The Processing Operative follows the step by step procedures as set out in the SOP under section 7.7.3;</li> <li>• The edge of the extraction buffer tube must not be touched by the extraction solution bottle whilst administering drops of extraction solution to the tube;</li> </ul>

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			<ul style="list-style-type: none"> <li>• The extraction solution bottle will be decontaminated with anti-viral wipes between samples;</li> <li>• Sample preparation area and equipment will be cleaned thoroughly with disinfectant/anti-virus wipes between samples;</li> <li>• Processing operatives wear disposable gloves and replace these after each sample.</li> </ul>
Contact with contaminated waste including sample waste	Staff, pupils, visitors, contractors, household members	Transmission of the virus leading to ill health or potential death	<ul style="list-style-type: none"> <li>• Arrangements have been made with the school's existing specialist waste contractor/hygiene waste contractor to: <ul style="list-style-type: none"> <li>○ Collect waste (ongoing – not yet resolved, waste is stored in the caged area at the side of school)</li> </ul> </li> <li>• Care is taken by all staff to ensure that all waste is disposed into the correct coloured bin bags (as shown in the section 13 in the SOP);</li> <li>• Waste categories are: <ul style="list-style-type: none"> <li>○ Domestic / recycling (all packaging) → Black bag</li> <li>○ Chemical (swabs/cartridges/tissues) → Unmarked Yellow or Clear bag</li> <li>○ Offensive (PPE, cloths, mop heads) → Tiger bag</li> </ul> </li> <li>• Waste bins are easily accessible within the testing site;</li> <li>• At the end of each day, or as necessary, waste bags are appropriately sealed when full (every 100 tests) and are stored securely ready for collection by the waste contractor;</li> </ul> <p><b>Where wheelie bins are provided:</b></p> <ul style="list-style-type: none"> <li>• Each 'wheelie' bin is clearly labelled with the waste category;</li> <li>• 'Wheelie' bins are kept in a secure storage area whilst awaiting collection;</li> </ul>

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			<ul style="list-style-type: none"> <li>All healthcare waste is collected and incinerated within 14 days of being generated.</li> <li>Where this is not possible the School will comply with the Environment Agency exemption <u>NFWD2</u> which stipulates that waste must be stored in a *secure place.</li> </ul> <p>*A container or a place is secure in relation to waste kept in it if: (a) all reasonable precautions are taken to ensure that the waste cannot escape from it; and (b) members of the public are unable to gain access to the waste.</p>
Incorrect result communication	Staff, pupils, visitors, contractors, household members	Wrong samples or miscoding of results	<ul style="list-style-type: none"> <li>2 identical barcodes are provided to person being tested at check in;</li> <li>The person being tested registers their details to a unique ID barcode before conducting the test, guidance/explanation will be provided by staff on site;</li> <li>Barcodes are attached by trained staff at the sample collection bay;</li> <li>Barcodes are checked at the analysis station 1 and applied to Lateral Flow Device at this station.</li> </ul>
Damaged barcode, lost LFD, failed scan of barcode	Staff, pupils, visitors, contractors, household members	No result recorded	<ul style="list-style-type: none"> <li>Individuals are called for a retest in the event of a damaged barcode or lost LFD.</li> </ul>
Processing operator contact with extraction solution which comes with the lab test kit	Processing operator	Exposure to extraction solution	<ul style="list-style-type: none"> <li>The components of the tests kits do not have any hazard labels associated with them, and the manufacturer information states that there are no hazards anticipated under conditions of use as described in other</li> </ul>

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			<p>product literature.</p> <ul style="list-style-type: none"> <li>• <b>PPE:</b> nitrile gloves which meet the Regulation (EU) 2016/425 and safety glasses with side shields are used at all times when handling the extraction solution. Impervious clothing/apron is worn to protect the body from splashes or spillages.</li> <li>• <b>Spillages:</b> surfaces which the solution has been spilt on are wiped with the required disinfectant solution/wipes and cleaning material is disposed of in line with the waste disposal procedures.</li> <li>• Training in handling potentially biohazardous samples, chemicals and good 'lab' practice is provided to all staff involved in the testing process to prevent improper handling;</li> <li>• Staff follow the procedures on the Material Safety Data Sheet provided by the manufacturer to mitigate against inhalation, skin contact or ingestion of these chemicals.</li> </ul>
A positive test result on site	Staff, pupils, visitors, contractors, household members	Potential spread of disease and emotional distress of those receiving a positive result	<ul style="list-style-type: none"> <li>• Test results are shared with parents/carers, pupils and staff as necessary;</li> <li>• School has arrangements in place for advising staff or pupils that receive a positive test result to ensure this is done in a sensitive and supportive manner in a quiet, private area;</li> <li>• The individual who has received a positive test will be treated as if they were a positive COVID case in terms of the prevention of infection to others;</li> <li>• If a pupil receives a positive test result their parent/carer will be contacted by the school and will be required to take them home. Where this is not</li> </ul>

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			<p>immediately possible, the pupil will be placed in a separate room until they can be collected, whilst being mindful of the individual pupils' needs;</p> <ul style="list-style-type: none"> <li>• Ideally, a window will be opened in the room for increased ventilation;</li> <li>• If it is not possible to isolate the pupil e.g. if it causes them undue distress or they need to remain under adult observation, an assessment will be carried out to see whether it is sufficient to move them to an area which is at least 2 metres away from others;</li> <li>• If an individual (adult or child) who has received a positive test result, needs to use the toilet they will use a separate one if possible. The toilet will then be cleaned and disinfected before being used by anyone else;</li> <li>• The area around the person who has received a positive test result will be cleaned and disinfected using disposable cloths or paper towels and disposable mop heads after they have left to reduce the risk of passing any infection on to other people as per the COVID-19: cleaning of non-healthcare settings guidance;</li> <li>• When caring for someone who has received a positive test result a face mask should be worn if a distance of 2 metres cannot be maintained. If direct contact is necessary, then gloves, an apron and a face mask should be worn;</li> <li>• Until they get further advice, the individual who has received a positive test result is advised that they must self-isolate immediately for 10 days and everyone in their household must self-isolate in line with national policy; They should only leave home for their follow-up test, if needed;</li> <li>• <del>Pupils/staff who have been identified as being in close contact with a positive case will be offered 'daily contact testing' over a 7 day period; this</del></li> </ul>

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			<ul style="list-style-type: none"> <li>Those contacts of positive cases are advised they must self-isolate in accordance with national</li> </ul>
Sharing of personal information	Staff and pupils	Misuse of personal information and breaches of GDPR	<ul style="list-style-type: none"> <li>Care is taken when handling personal information to ensure all necessary precautions are taken and that it is not shared with anyone who is not directly involved in dealing with the test results.</li> <li>Care is taken when entering and saving personal information electronically. School already has appropriate arrangements in place for this from other areas of work.</li> <li>Arrangements for dealing with any breaches of GDPR are understood and adhered to by the Headteacher and School Business Manager or Bursar.</li> </ul>



<b>PART C: ACTION PLAN Further action / controls required</b>						
<b>Hazard</b>	<b>Action required</b>	<b>Person(s) to undertake action?</b>	<b>Priority</b>	<b>Projected time scale</b>	<b>Notes / comments</b>	<b>Date Completed</b>