

# Risk Assessment



## Implementation of Lateral Flow Testing: Provision and use of home testing kits to primary and nursery schools from 25 January 2021

### Section 1:

|   |  |  |            |
|---|--|--|------------|
| <b>Date of Assessment: 27.01.2021,</b>  | <b>MAT/Establishment/Section/Team:</b> | <b>Review date:</b> (Complete once the action plan section below is addressed) |            |
| <b>Assessed by:</b><br>Please print names of all those involved with this assessment.                 | 1. Amy Townsend                        | Date:  | 01.02.2021 |
|   | 2. Susanne Naismith                    |  |            |
|   | 3. Carol Burditt                       |  |            |
|   | 4.                                     |  |            |
| <b>Staff signatures:</b><br>I/We have read and understood this RA and our role in its implementation. | 1.                                     | Date:  |            |
|   | 2.                                     |  |            |
|   | 3.                                     |  |            |
|   | 4.                                     |  |            |

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## **Background, Context & References:**

### **The National Testing Programme**

This risk assessment has been developed with reference to the NHS Test and Trace COVID-19 National Testing Programme How to Guide: Rapid testing of primary and nursery workforce. It should be read in conjunction with this document and other material available in the **DFE Portal**:

[Primary Schools Document Sharing Platform – Google Drive](#)

We note this portal is being regularly updated by the DFE.

Schools are required to carry out the testing programme in line with the terms set out in the agreement document published on the document sharing platform: [Primary Schools Agreement Mass Testing Roll-Out.pdf - Google Drive](#)

### **Lateral Flow Device Testing in Primary and Nursery Schools**

Lateral Flow testing kits will be provided to all staff in primary and nursery schools. Participation in the programme is voluntary.

Testing is important because staff could be carrying the virus without knowing it and may spread it to others. Testing all staff without symptoms will support schools and nurseries to continue to operate.

All staff in primary and nursery schools are being provided with Lateral Flow Devices for use at home. Staff will be asked to carry out twice weekly testing at home (3 to 4 days apart) before they come into the workplace. Any member of staff who obtains a positive test result from their lateral flow test or who obtains two void tests must, in conjunction with other members of their house self-isolate and follow advice from NHS Test and Trace.

A negative test result indicates that the person taking the test was not infectious at the time of the test. It is not a guarantee that they do not have coronavirus. Those with a negative test result must still follow national guidelines which include regular handwashing, social distancing and the wearing of face coverings as required.

## 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?<br>(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?<br>(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?<br>(See Table 1) | What is the <b>Risk Rating</b> ?<br>(See Table 2 and 3) |
|---|--|---|---|---|--|---|
| <b>2.1 ENGAGEMENT IN THE PROCESS</b>                                      |  |   |   |   |  |   |
| Periodic home testing by staff (every 3-4 days until further notice).     | Member of staff does not participate in periodic testing. Potential for greater likelihood of transmission of coronavirus within school (and wider community). | All members of school community               | Fatal/Major   | <p>Participation is voluntary for the programme and active consent is required by staff.</p> <p>Written Information provided to all staff re: importance of home testing and explanation of the process involved. Email sent to all staff on 1.2.2021 with all relevant documents and letter from Headteacher.</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>We note that we are also able to offer tests to other professionals associated with the school should they wish to be involved. We are awaiting a response from our cleaning contractors to see if they are asking their staff to access the tests through their company. We will share the resources and letter with them if so. We will</p> | Low  |   |

|  |  |                                 |         |  |     |  |
|--|--|---------------------------------|---------|--|-----|--|
|  |  |                                 |         | also share the resources, training and test kits with WSS our caretaking company.  |     |  |
| <b>2.2 STORAGE AND DISTRIBUTION OF TESTS</b> |  |                                 |         |  |     |  |
| Storage of test kits                         | Deterioration of the tests due to storage at wrong temperature.<br>Loss, damage or theft of testing materials.           | All members of school community | Serious | A secure area has been allocated for the storage of testing kits prior to distribution. (between approx. 2 degrees C-30 degrees C).  | Low |  |
| Distribution of test kits                    | Non-compliance with existing social distancing arrangements during distribution of tests leads to spread of coronavirus. | All members of school community | Serious | Test Kit Log to be completed and staff must sign for test kits and revised instructions. This will be lead by Carol and Susanne who will distribute the kits, record the lot number and supervise staff signatures.<br><br>Natural Staggered distribution will take place with staff arriving at different times in the morning and being given their kit on arrival.<br><br>No Queue management system required (see natural staggered distribution)<br><br>Hand sanitiser is available at the point of collection and throughout the school. | Low |  |
| <b>2.3 WORKFORCE</b>                         |  |                                 |         |  |     |  |
| Workforce requirements                       | Inadequate training and supervision of staff leads to inaccurate test administration.<br>This could prevent the school   | All members of school community | Serious | Those involved in the administration of the programme have attended DFE webinars (18/01/21 & 19/01/21).<br>Attended by AT, SN and CB on 18.01.2021 and 19.01.2021  | Low |  |

|                                |   |                                 |         |   |     |  |
|--------------------------------|---|---------------------------------|---------|---|-----|--|
|                                | responding to positive test results and reporting incidents.  |                                 |         | <p>All staff involved in administration of home testing have read How to Guide: Rapid testing of the primary and nursery workforce.</p> <p>Group session to go over materials on the portal provided.</p> <p>We have identified 'COVID-19 Coordinator' and 'Registration Assistant' – Susanne Naismith and Carol Burditt.</p>   |     |  |
| <b>2.4 TEST ADMINISTRATION</b> |   |                                 |         |   |     |  |
| Data Protection                | Unauthorised sharing of personal data for test participants   | All members of school community | Serious | <p>All staff have been given the Privacy Notice provided by the DFE. Emailed 1.2.2021</p> <p>Staff administering the process understand their responsibilities with respect to the confidentiality of personal data.</p>  | Low |  |
| Allocation of test kits        | Maladministration means that it is not possible to trace test kits if recall is required or further follow up needed by NHS | All members of school community | Serious | <p>All documents received with test kits eg: delivery notes etc to will be retained.</p> <p>Test Kit Log (see portal for template) to be maintained according to instructions set out in 'How to Guide' (see above).</p> <p>Test Kit Log to include: name of school/nursery; name of person issuing test; date of issue; lot number of test; confirm receipt of New Instructions for Use; name of person issuing test.</p> <p>We note that we are required to retain a copy of the Test Kit Log for a period of twelve (12) months from the</p> | Low |  |

|                                     |  |                                 |             |   |        |  |
|-------------------------------------|--|---------------------------------|-------------|---|--------|--|
|                                     |  |                                 |             | date of the last entry to be made by the School in the Test Kit Log.  |        |  |
| <b>2.5 THE HOME TESTING PROCESS</b> |  |                                 |             |   |        |  |
| Damaged test kit                    | Staff are unable to complete test<br>Result is inaccurate or void                                  | All members of school community | Fatal/Major | Staff advised via training video that they must not use test kits where the contents are damaged and should advise the COVID-19 coordinator where this is the case.<br><br>We will provide a replacement test kit and report to DFE if there are multiple issues. | Low    |  |
| Self-swabbing                       | Injury during the self-swabbing process  | All members of school community | Serious     | Test kit provided by the NHS conform to MHRA standards and has been approved for use at home.<br><br>Staff have been advised to read the accompanying instructions and watch:<br><a href="#">Step by step guide to COVID-19 self-testing - YouTube</a>            | Medium |  |
| Access arrange – ments              | Staff are unable to access instructions (eg: translation required or alternative format required). | Individual staff                | Serious     | No translation or alternative format documents required by staff.<br>Staff can access the video clips and training on school site if there are technical issues at home.  | Low    |  |
|                                     | Staff are unable to self-administer the tests  | Individual staff                | Serious     | The tests are not mandatory.<br>Training will be provided by video to support staff in accessing this. Further documents sent to staff to show them visually how to take the test and submit the results.   | Low    |  |

|   |  |                                 |             |  |     |  |
|---|--|---------------------------------|-------------|--|-----|--|
| Inappropriate/ unauthorised use of test kit in the home environment | Inappropriate/ unauthorised use of test kit in the home environment causes injury to other members of the household. | All members of school community | Serious     | Test kit provided by the NHS conform to MHRA standards and has been approved for use at home.<br><br>Staff are responsible for the safe storage of the test kit and the sign to acknowledge and accept responsibility for this when receiving their test kit.  | Low |  |
| <b>2.6 MANAGEMENT AND COMMUNICATION OF RESULTS</b>                  |  |                                 |             |  |     |  |
| Response to a positive test result                                  | Potential for infected person to come into contact with other individuals.   | All members of school community | Fatal/Major | Staff have been provided with instructions re: reporting test results.<br><br>Where a member of staff reports a positive result, we will follow our existing procedures for tracking contacts etc in line with PHE/local guidance.<br><br>Staff that receive a positive result will be advised to immediately self-isolate in line with government guidance and to arrange to undergo a PCR test | Low |  |
| Management of results   | School   | All members of school community | Serious     | A COVID-19 Test Register has been set up (see portal for template). This enables us to track results and engagement with the testing process.<br><br>The COVID -19 Test Register will be retained until further notice.  | Low |  |
| <b>2.7 INCIDENT REPORTING</b>                                       |  |                                 |             |  |     |  |
| Incident Reporting  | Incident occurs that could affect the quality or safety of the testing   | All members of school           | Serious     | Covid-19 Coordinator will retain a log of any incidents that occur and report these to the DFE Helpline. (Time, date and details will be recorded).  | Low |  |



|  |  |           |  |  |  |  |
|--|--|-----------|--|--|--|--|
|  | process (local issue or more widespread) | community |  | We note that the DFE may contact us for feedback on the process. |  |  |
|--|--|-----------|--|--|--|--|

### Section 3: Action plan:

| What is the <b>Hazard</b> you need to Control?<br>(medium to high from the risk rating above) | What <b>additional precautions</b> do you need to either eliminate or reduce the risk to an acceptable level?  | Who is <b>responsible</b> for implementing these controls? | <b>When</b> are these controls to be implemented (Date)? | When <b>Were</b> these controls implemented (Date)? |
|---|--|--|--|---|
| Medium  | Addressed and all being done that is reasonably practicable. See above for further mitigation.<br><br>We have identified all the reasonably practicable control measures available and will actively monitor the issue in operation. | Staff  | By the time that testing commences                       |   |
|   |  |  |  |   |
|   |  |  |  |   |
|   |  |  |  |   |

**Table 1: Definitions**

| Potential Severity of Harm | Meaning of the harm description   | Likelihood/Probability of Harm | Meaning of likelihood/probability      |
|----------------------------|---|--------------------------------|--|
| <b>Fatal/Major Injury</b>  | Death, major injuries or ill health causing long term disability/absence from work.                   | <b>High (Likely/probable)</b>  | Occurs repeatedly/ to be expected.     |
| <b>Serious Injury</b>      | Injuries or ill health causing short-term disability/absences from work (over three days absence)     | <b>Medium (possible)</b>       | Moderate chance/could occur sometimes. |
| <b>Minor Injury</b>        | Injuries or ill health causing no significant long-term effects and no significant absence from work. | <b>Low (unlikely)</b>          | 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 ranking and what action to take**

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