

# RISK ASSESSMENT

<b>Activity being Risk Assessed:</b>	Mass COVID-19 Testing of Staff	<b>Date of risk assessment:</b>	29.01.2021
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<b>What are the hazards?</b>	<b>Who might be harmed and how?</b>	<b>What are you already doing?</b>	<b>Do you need to do anything else to manage this risk? Additional Actions</b>
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## Health, Safety, and Infection Control.

Unauthorised access to the test kits.	All school workforce, inc. supply teachers and visitors (staff).  Pupils in school (and their families) through transmission of the virus	1. Test kits stored in secure location with access to approved staff only	
Testing kit storage and collection is not secure	All school workforce, inc. supply teachers and visitors (staff).  Pupils in school (and their families) through transmission of the virus	1. The <b>COVID Coordinator</b> is responsible for ensuring that the storage and collection point is: <ul style="list-style-type: none"> <li>• Able to be secured to prevent unauthorised access to the test kits.</li> <li>• Test kits are stored inside and at a temperature between 2 and 30 degrees, out of direct sunlight/heat.</li> </ul>	
Contact between <b>Registration Assistant</b> and staff at hand over of test kits increasing the risk of transmission of COVID19	All school workforce, inc. supply teachers and visitors (staff).  Pupils in school (and their families) through transmission of the virus	1. Social distancing maintained at point of handing test kits to staff.  2. <b>Registration Assistant</b> to wear mask and maintain a 2m distance from staff members during the hand over process.	
Incidents are not	All staff – incidents may	1. Incidents are managed in line with the SOP	<b>Clinical Standard Operating Procedure (SoP) for Staff Testing</b>

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managed, and lessons learnt not implemented.	reoccur	2 Lessons learnt will be cascaded to staff and new procedures implemented as appropriate	<p><b>by the Dept for Health and Social Care.</b> This SOP sets out the areas of the testing process that schools are accountable for which include oversight and governance of the testing service. <b><i>The areas that schools are accountable for are as follows:</i></b></p> <ol style="list-style-type: none"> <li>1. Ensuring appropriate local oversight and governance</li> <li>2. Communication with staff and other stakeholders</li> <li>3. Managing test stock and reordering</li> <li>4. Setting up and maintaining Test Kit Log</li> <li>5. Incident reporting and response including lessons learnt</li> <li>6. Alignment with local public health response to COVID 19</li> </ol> <p>The Governing Body should ensure that the areas schools are accountable for are regularly reviewed and are visible to them and that the operation of these areas is in line with the SoP.</p> <p><b>Non- Clinical Incidents</b> – where there seems to be repeated or similar issues with the testing kits e.g multiple repeated void tests/leaking damaged tubes/incomplete test kits. REPORT THESE TO THE DfE HELPLINE</p> <p><b>Clinical Incidents</b> – an allergic reaction/ a swab breaking leading to bleeding/other bleeding linked to taking the test. REPORT USING THE YELLOW CARD LINK <a href="https://coronavirusyellowcard.mhra.gov.uk">https://coronavirusyellowcard.mhra.gov.uk</a></p>

## Staffing and Running Testing

Misunderstanding of the key roles in the school.	All school workforce, inc. supply and peripatetic teachers	1. <b>COVID Coordinator</b> appointed to be responsible for the overall management of rapid COVID-19 testing for primary/nursery school workforce.	1.The <b>COVID Coordinator</b> will be the Headteacher or a member of the SLT
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	<p>and visitors (staff).</p> <p>Pupils in school (and their families) through transmission of the virus</p>	<p>2.The <b>COVID Coordinator</b> is the main contact with NHS Test and Trace and is responsible for:</p> <ul style="list-style-type: none"> <li>● Communicating with stakeholders.</li> <li>● Ensuring staff are using the right instructions and they sign for the tests using the <b>Test Kit Log</b>.</li> <li>● Providing training and information for all staff workforce.</li> <li>● Management of delivery of tests and stock management of tests.</li> <li>● Reordering tests when required.</li> <li>● Ensuring creation and overseeing the management of a <b>Register</b> for logging test results</li> <li>● Ensuring creation and overseeing the management of an <b>Incident Log</b> - .- <b>see comment in end column for these logs</b>.</li> <li>● Reporting incidents and carrying out risk management.</li> <li>● Managing the storing and the reporting of required data.</li> <li>● Reviewing updates to guidance daily and implementing required changes.</li> <li>● Ensure the school testing process is aligned with the OCC Public Health response to Covid-19 and is reviewed regularly to ensure continued alignment.</li> <li>● Managing and continually assess the process against this risk assessment.</li> <li>● Responding to staff questions.</li> </ul> <p>3. Establish appropriate oversight and governance of testing at JHS and TPS Primary Schools</p> <p>4. <b>Registration Assistant</b> established to:</p> <ul style="list-style-type: none"> <li>● Distribute the correct number of test kits to staff and</li> </ul>	<p>2. <b>Registration Administrator</b> <b>Test Kit Log</b> developed using NHS template – information needed:</p> <p>Name of School Name of person Issuing Test Date Test Issued Lot Number of Test Kit issued Confirmation of receipt of new Instructions For Use Name of person using the test <b>Electronic or handwritten signature of the person using the test</b> <b>A template can be found on:</b> <a href="https://drive.google.com/drive/folders/1X4fLxy6_ppmpmKrv3hT2M6cduAN_GS54">https://drive.google.com/drive/folders/1X4fLxy6_ppmpmKrv3hT2M6cduAN_GS54</a></p> <p><b>School Register</b> for JHS and TPS developed by J.Eyres (on site at JHS) to record results of tests taken. Information entered – Name of staff member taking twice weekly tests/their d.o.b / the registration number of the test kit taken. This information is stored on office computer <b>Register for logging incidents</b> to go onto school register</p> <p><b>THE TEST KIT LOG and THE SCHOOL REGISTER</b> must be 2 separate documents</p> <p>Letter sent to Parents/Carers of pupils accessing school site prior to staff commencing testing on week commencing 25.01.2021.</p> <p>Federated staff Meeting to discuss roll out of testing – Thursday 21<sup>st</sup> January All staff sent PowerPoint from staff meeting for reference purposes Follow - up staff meetings – JHS – Mon 25<sup>th</sup> Jan</p>
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		<p>managing the schedule for the distribution of the next sets of kits (<b>face mask must be worn, and social distancing maintained</b>).</p> <ul style="list-style-type: none"> <li>Inputting test results from staff into your school's '<b>Register</b>'. Ensuring that the register is saved securely.</li> <li>Sending reminders to participants to communicate their results online and to the school.</li> <li>Working with the <b>COVID Coordinator</b> to support the management of the stock of kits.</li> </ul>	<p>TPS – Thurs 28<sup>th</sup> Jan</p> <p><b>Registration Assistant</b> and <b>Registration Administrator</b> to be a shared role at TPS</p> <p>A Contingency Plan needs to be developed for absence by the key role holders identified above.</p>
<p>Failure to train all members of staff properly</p>	<p>All school workforce, inc. supply and peripatetic teachers and visitors (staff).</p> <p>Pupils in school (and their families) through transmission of the virus</p>	<p>1.The <b>COVID Coordinator</b> to attend/watch DfE webinars 1&amp;2. Other key members of the testing team or staff members can watch the recordings if deemed necessary/helpful. The <b>COVID Coordinator</b> to access and read all the information on the DfE Primary Schools Document Sharing platform.</p> <p>2.All staff to undertake the following training. Training records to be established and maintained:</p> <ul style="list-style-type: none"> <li>Tell staff what rapid testing is. Use the NHS '<b>How to Guide – Rapid Testing of Primary and Nursery Workforce</b>'.</li> <li>Ensure all staff understand the different COVID testing roles in the school and who holds these roles.</li> <li>Explain the process of collection of tests/correct instructions, the process in the school for recording the lot number against their name.</li> <li>Explain the process of taking a test at home. All staff to watch instructional video provided on You Tube – '<b>Step by Step Guide to COVID-19 Self Testing</b>'.</li> </ul>	<p>2. i)Establish a training record</p> <p>ii)Display names of staff undertaking the different Covid 19 LFT responsibilities in the staff room</p> <p>OOO Site for Information re lateral Flow Testing</p> <p><a href="http://schools.oxfordshire.gov.uk/cms/content/mass-asymptomatic-testing-schools-and-colleges-oxfordshire">http://schools.oxfordshire.gov.uk/cms/content/mass-asymptomatic-testing-schools-and-colleges-oxfordshire</a></p> <p>DfE platform for information re Lateral Flow Testing – <a href="https://drive.google.com/drive/folders/1X4fLxy6_ppmpmKrv3hT2M6cduAN_GS54">https://drive.google.com/drive/folders/1X4fLxy6_ppmpmKrv3hT2M6cduAN_GS54</a></p>

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		<ul style="list-style-type: none"> <li>• All staff to read the Instructions for Use document ‘<b>Your Step-by-Step Guide for COVID-19 Self-Testing</b>’ v 1.3.2 ensuring that they are using the correct version only.</li> <li>• <b>Make sure that all staff know that it is a requirement for them to report their test results to both to NHS Test and Trace and to the school.</b></li> <li>• Use the <b>Participation and Data Protection</b> slide (from the webinar) and links to discuss any staff concerns.</li> <li>• Make sure staff know who to contact if they have an incident while testing at home. -</li> </ul> <p>3.All staff to read the <b>Privacy Notice</b> before taking the tests.</p> <p>4. All staff aware that testing is <b>not</b> mandatory and there is not a requirement to provide proof of a negative test result to attend school ( although participation in testing is strongly encouraged).</p> <p>Staff who decline to participate in the testing programme must follow the usual national guidelines on self-isolation and get tested if they show symptoms.</p> <p>5. The <b>COVID Coordinator</b> will review the <b>DfE Primary Testing FAQs</b> on a regular basis.</p> <p>6. The <b>COVID Coordinator</b> to check the latest government guidance on rapid testing of primary/nursery workforce on a regular basis.</p> <p>7. All questions from members of staff to be checked against the Primary Testing FAQs on the document</p>	<p><b>Non- Clinical Incidents</b> – where there seems to be repeated or similar issues with the testing kits e.g multiple repeated void tests/leaking damaged tubes/incomplete test kits. REPORT THESE TO THE DfE HELPLINE</p> <p><b>Clinical Incidents</b> – an allergic reaction/ a swab breaking leading to bleeding/other bleeding linked to taking the test. REPORT USING THE YELLOW CARD LINK <a href="https://coronavirusyellowcard.mhra.gov.uk">https://coronavirusyellowcard.mhra.gov.uk</a></p> <p>Form to use to report issues relating to delivery and supply of testing kit and issues related to asymptomatic testing in schools and colleges that cannot be resolved by the published guidance or by accessing the helpline.  <a href="https://form.education.gov.uk/service/rapid-testing-contact">https://form.education.gov.uk/service/rapid-testing-contact</a></p> <p>NOTE: DfE to send outadditional info w/c 08.02.2021</p>
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		<p>sharing platform by the <b>COVID Coordinator</b> and the answer communicated to all staff members. <b>Should the answer not be found in the FAQs, the COVID Coordinator will contact the DfE coronavirus helpline on 0800 046 8687.</b></p>	
<p>School unaware of staff members 'opting out'</p>	<p>All school workforce, inc. supply and peripatetic teachers and visitors (staff).</p> <p>Pupils in school (and their families) through transmission of the virus</p>	<ol style="list-style-type: none"> <li>1. The <b>COVID Coordinator</b> will review information from NHS Test and Trace to understand when/how the schools will receive their deliveries of testing kits. The delivery schedule and further advice from NHS Test and Trace can be found on the DfE document sharing platform.</li> <li>2. The <b>COVID Coordinator</b> to contact DfE Coronavirus Helpline if help is needed regarding deliveries (0800 046 8687), including missing or damaged items.</li> <li>3. The <b>Registration Administrator (overseen by the COVID Coordinator)</b> to create and manage a <b>Test Kit Log</b> using the template from the DfE platform</li> </ol> <p><a href="https://drive.google.com/drive/folders/1X4fLxy6_ppmpmKrv3hT2M6cduAN_GS54">https://drive.google.com/drive/folders/1X4fLxy6_ppmpmKrv3hT2M6cduAN_GS54</a></p>	
<p>Staff are slow in communicating results to school.</p>	<p>All staff and students – positive test are not managed to ensure close contacts are identified and told to self-isolate.</p>	<ol style="list-style-type: none"> <li>1. Staff are reminded to report test results in a timely manner</li> <li>2. Registration Assistant will chase any test results not supplied by staff.</li> </ol>	

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Staff do not report void or invalid test results.	All staff – the effectiveness of the use of the test kits cannot be assessed.	1. Staff reminded to report all test results including void or invalid tests results.	
Test Kit Log is inaccurate	<p>All school workforce, inc. supply and peripatetic teachers and visitors (staff).</p> <p>Pupils in school (and their families) through transmission of the virus</p>	<p><b>1. The Registration Assistant</b> must record who takes the test kits on a <b>Test Kit Log</b> and ensure that this information is stored securely. This log must include the following and be kept until further guidance is given</p> <ul style="list-style-type: none"> <li>● Name of school.</li> <li>● Name of person issuing the test.</li> <li>● Date of issue.</li> <li>● Lot number of test kit (on the back of the test kit).</li> <li>● Name of person using the test</li> <li>● Signature of person taking the test kit</li> </ul> <p><b>2. The Registration Assistant</b> will ensure that all staff members receive a copy of the right <b>Instructions for Use</b> (v.1.3.2 dated 15 January 2021, plain blue cover). This will be recorded on the Test Kit Log (template taken from the DfE platform) Old instructions to be destroyed</p>	
Tests are not completed accurately by staff workforce	<p>All school workforce, inc. supply and peripatetic teachers and visitors (staff).</p> <p>Pupils in school (and their families) through transmission of the virus</p>	<p>1.The <b>COVID Coordinator</b> to ensure that all staff:</p> <ul style="list-style-type: none"> <li>● Undertake the training and are provided with the correct literature and video links.</li> <li>● Can ask questions and discuss issues.</li> <li>● Feel confident in reporting issues and concerns to the <b>COVID Coordinator</b>.</li> </ul>	

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<p>Inaccurate reporting of test results</p>	<p>All school workforce, inc. supply and peripatetic teachers and visitors (staff).</p> <p>Pupils in school (and their families) through transmission of the virus</p>	<p>1. The <b>COVID Coordinator</b> to ensure that all staff:</p> <ul style="list-style-type: none"> <li>● Are trained in and understand how to <b>report their test result to NHS Test and Trace as soon as the test is completed and every time they take a test, even if the result is negative or invalid – either online or by telephone (as per the instructions in the home test kit).</b></li> <li>● Are aware that the test assigned to them is only to be used by themselves and that it must never be taken by anyone else.</li> </ul> <p>2. The <b>COVID Coordinator</b> will be responsible for the development of a locally managed <b>Register</b> and a process for all staff to log test results with the school. These results need to be logged before staff arrive on site in the morning in order to identify staff with positive results, for bubble management and for contract tracing. This will be a separate document to the <b>Test Kit Log</b> for data protection reasons. This system to be communicated clearly to the whole staff team. This will include:</p> <ul style="list-style-type: none"> <li>● The process and timelines for test to be taken and results to be communicated by staff to school (and onward communication to the headteacher if/when required).</li> <li>● A process for dealing with non-reporting by staff.</li> <li>● The process for logging results and how the results will be saved securely on office computers.</li> <li>● The requirement to follow standard procedures including reporting results online.</li> <li>● Identification and reporting of incidents.</li> <li>● Procedures in place to check and update the <b>Test Kit Log, Register</b> and <b>Incident Log</b> on a regular</li> </ul>	<p>.</p> <p>Staff to test themselves late on a Sunday Evening/Monday Morning and on a Wednesday evening/Thursday morning. There is some flexibility around these days to accommodate part-time staff. However all staff (full time and part-time should test twice a week).</p> <p><b>February 2021 Half Term – Staff did a LFT on the evening of the 1<sup>st</sup> Sunday (14h Feb) and the evening of the last Sunday (21<sup>st</sup> Feb). The mid – week test was optional.</b></p> <p><b>Positive test results to be communicated to P.Hankey (JHS) and A.Charlton (TPS) via a phone call as soon as the result is known.</b></p>
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		<p>basis.</p> <p>3. The register should be kept until further guidance is given</p>	<p>Parents/carers will be notified of school/bubble/Year Group closures by 8.00 a.m.</p> <p>Staff known to have taken the test but who have failed to report the result to school will be reminded initially by e-mail and will then be telephoned</p>
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## Information Governance

Staff information is lost or shared through the process of entering on the Test Kit Log	Staff	1. Clear process identified in the SOP	Staff may consider Complaint to ICC.
Staff tested positive but no further action taken as Test Kit Log not updated correctly and in a timely manner.	Staff may spread Covid-19	<p>.</p> <p>1. Clear processes identified in the SOP</p> <p>2. Staff training</p>	
Risk of data protection breach in managing personal data	<p>All school workforce, inc. supply and peripatetic teachers and visitors (staff).</p> <p>Pupils in school (and their families) through transmission of the</p>	<p>1. Access to the data to be restricted to the <b>COVID Co-ordinator</b> (and <b>Registration Assistant</b>) and the Headteacher if they are not the COVID Co-ordinator</p> <p>2. Data/records to be stored securely on school computers only, not to be removed from school.</p> <p>3. Ensure that the collection and storage of the data meets legislation requirements and the school's Data Protection Policy.</p>	

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	virus	4 Staff have been issued with a privacy notice explaining what personal data is required to participate in the programme.	
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## Well-Being

Staff anxiety at having to take the test impacts their well-being.	Staff mental well-being is affected by the testing process.	<p>1. Staff have been made aware that the twice weekly testing is <b>not</b> mandatory</p> <p>2. Staff have been made aware that they can stop the twice weekly testing at any time in the future</p> <p>3. Staff have been made aware that they can start twice weekly testing at any time.</p>				
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<b>Risk Assessment Completed by (Name):</b>	A.M.Charlton	Head of teaching and Learning TPS Federated SLT Member	Date 29.01.2021
<b>Authorised by Line Manager (Name):</b>	P.Hankey	Executive Headteacher	Date 05.02.2021
<b>Reviewed by:</b>	A.M.Charlton	Head of Teaching and Learning	Date – 03.03.2021
<b>Distribution List:</b>	Chair of Governors	<b>Date:</b>	Communicated via Governor Hub
	All Staff	<b>Date:</b>	Communicated by e-mail and placed on shared drive on School Network – discussed at staff meetings