



LFT Risk Assessment

Implementation of Lateral Flow Testing to school staff and students from January 2021

Section 1:

Date of Assessment: 06.01.2021	Chew Valley School	Review date: (Complete once the action plan section below is addressed)	
Assessed by: <small>Please print names of all those involved with this assessment.</small>	1. Julie Seeley	Date:	14.01.2021
	2. Fiona Barlow		14.01.2021
	3. Mark Farley		14.01.2021
	4.		
Staff signatures: I/We have read and understood this RA and our role in its implementation.	1. <i>J Seeley</i>	Date:	14.01.2021
	2. F Barlow		14.01.2021
	3. M Farley		14.01.2021
	4.		

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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 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/1jYv0MjFyIbZgPn_1S10OuRgfrj_b5_P

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

Lateral Flow Device Testing

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) will be offered to all secondary pupils (twice with a 3-5-day gap between tests) and staff as they return from the Christmas holidays

After this, staff will be tested once a week on an ongoing basis. Pupils, students and staff will be tested if they come into contact with a positive case. This new approach, known as 'serial contact testing', will allow those who are in close contact with someone with a positive PCR test for COVID-19 to return to school or college if they agree to be tested for 7 days (not including weekends) following last contact with a positive case. Quick Swabbing and processing of these tests will be conducted at a dedicated testing site in the school or college with results available in around 30 minutes. Once a positive result is identified with an LFD it must be validated by a confirmatory off-site PCR test (booked via NHS Test and Trace).

LFD testing will take place on the school site. Whilst there is some scope for schools 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. 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/ pupils	Member of staff or young person does not participate in periodic testing (eg: weekly staff test or test before returning to school)	All members of school community		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 waiting a test result or has tested positive.		
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.		
	Inability to participate (testing not available at weekend)	All members of school community		<p>Pupils and staff who are close contacts of a positive case should repeat daily tests on school days until 7 negative test days have elapsed. If the week elapses on a non-school day, they must isolate until they can test one final day on the following Monday.</p> <p>If a week spans a weekend then those involved will need to isolate on the Saturday and Sunday.</p>		
2.2 SITE SET UP						
Storage of test kits	<p>Deterioration of the tests due to storage at wrong temperature.</p> <p>Loss, damage or theft of testing materials.</p>	All members of school community		<p>Secure area allocated for storage of testing kits and PPE according to instructions (between approx. 2 degrees C-30 degrees C)</p> <p>Storage within lockable science classroom. Temperature in this area can be effectively maintained within the specified range.</p>		
<p>Arrangements for social distancing, face coverings etc. across the site</p> <p>(Test subjects)</p>	Non-compliance leads to spread of coronavirus.	All members of school community		<p>Face masks: Prominent signage reminding attending subjects of the above will be displayed at the entrance to the building.</p> <p>Face coverings/masks to be worn by subjects at all times whilst on the premises except for brief lowering at time of swabbing.</p> <p>Requirement to wear face covering/mask to be reminded to all subjects in advance at time of communication of testing arrangements.</p>		

				<p>Compliance with wearing of face covering/mask of all subjects to be visually checked on arrival and throughout the building by staff.</p> <p>Hand hygiene: All subjects to use hand sanitiser provided on arrival & adherence to this is enforced by reception staff.</p> <p>Sanitiser is provided at entrance point to room and at registration desk, each testing bay, each processor area and at recording desk.</p> <p>Social distancing: Two metre social distancing to be maintained between subjects with measured floor markings in place to ensure compliance in addition to verbal reminders if necessary from reception, queue management & sampling staff.</p> <p>A one-way flow of subjects through the building is to be initiated and maintained at all times. Compliance with this is to be ensured by queue management staff.</p> <p>Area has been set up with this in mind – subjects to enter from front of building and exit through rear of classroom.</p> <p>Cleaning: Regular cleaning of the site including wipe down of all potential touchpoints is accordance with PHE guidance.</p>		
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				<p>Janitorial staff will be in attendance daily and area to be spray cleaned by site staff once testing complete for the day.</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 Hard vinyl flooring in place in testing area • Site well lit; good airflow and no recirculation of air Windows opened at start of the day and doors propped open. Ambient temperature to be 15-30 degrees C for the lateral flow devices to operate and 2-30 degrees C for storing them. Temperature will be monitored but this range is within the normal teaching range so no issues expected • Registration desk at the first point where the individual being tested would enter the test site. This is located at the entrance of the room • 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 social distance from other test subjects. Room set up to allow one way flow with 2m distance between testers and subjects 		

				<ul style="list-style-type: none"> • Test subject chairs in swabbing bay to be a minimum of 2m apart Bays have been set up at 2m distance Each swabbing area will have a processing desk close by – no more than 1m away. Recording desk to be located close by. Processing desks have been set up further than 1m away to allow 2m distancing to be maintained • 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. This has been marked by hazard tape on the floor • Waste disposal arrangements in place with clinical waste contractor (see below). We are in conversation with Initial 		
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</p>		

				<p>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. 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> <p>Environmental: We will do not let the product enter drains</p> <p>Spillages: 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> <p>All operatives have been fully trained</p> <p>We will locate and follow procedures on the MSDS form provided by Innova to mitigate against inhalation, skin contact or ingestion of these chemicals.</p>		
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Waste disposal		All members of school community		<p>All LFD packaging and general waste – black bag USE GENERAL WASTE BIN</p> <p>Swabs, tissues, cartridges yellow bag or clear bag (unmarked). USE MEDICAL WASTE BIN</p> <p>PPE Mop heads/ cloths – Tiger bag (yellow with black stripes). USE MEDICAL WASTE BIN</p> <p>Arrangements are in place with our waste contractor to obtain suitable waste receptacles and to collect medical waste.</p> <p>We are in conversation with Initial</p>		
2.3 WORKFORCE						
Workforce requirements	<p>Inadequate training and supervision of staff leads to:</p> <ul style="list-style-type: none"> • Transmission of the virus • Injury or distress to participants/ colleagues • Inaccurate test results 	All members of school community		<p>Staff involved to complete mandatory training. Records to be retained. Complete Thursday 08.01.2021</p> <p>Supervision from school quality assurance lead. Ongoing – F Barlow/J Seeley</p> <p>Walk through to be provided before starting the process.</p> <p>Walk through completed Thursday 08.01.2021</p> <p>Opportunities for workforce involved to review process/ update training as required. This is encouraged and is ongoing</p> <p>Use of competency checklists for key roles</p> <p>Ongoing</p>		

				School responsible for a Quality Management Plan (See DFE Portal for updates).		
	Lack of DBS check leads to recruitment of unsuitable adults working with children. Potential for abuse.	All members of school community		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 outcome of check is received. Currently staffed from existing workforce so no additional checks required.		
	Lack of awareness of school safeguarding protocols puts children and workforce at risk.	All members of school community		Safeguarding (also health and safety/ fire safety/ lockdown) briefing to be provided to the workforce. Currently staffed from existing workforce so no additional training required.		
	Lack of PPE or inappropriate use of PPE.	Testing workforce		PPE to be provided by DFE and allocated to workforce according to requirements set out in Schools 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. Completed Posters available in test site to remind workforce of correct use and requirements. Done PPE to be disposed of in medical waste bins.		

	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. Ongoing		
Staff welfare	Contamination of personal items welfare items etc. Dehydration of the testing workforce.	Testing workforce		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. All PPE must be removed before leaving the testing area including visits to the toilet. Visiting staff will be advised of the location of these facilities as part of their site induction. Breaks will be provided and a separate area provided for workforce to take their breaks which could be the school staffroom. Face coverings (not PPE used in testing area) to be worn in line with school protocols when accessing wider school building. S2 being used for this currently		
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. If this becomes necessary we will engage with NSC/BNES to establish if this is feasible		

<p>Arrival at school prior to test</p>	<p>Student or member of staff with symptoms of coronavirus arrives at school. Potential to infect others</p>	<p>All members of school community</p>		<p>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 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.</p> <p>Ongoing</p> <p>Parental consent will have been sought and received before pupil attends testing site.</p> <p>This will be captured and recorded and will be available to registration staff within test site.</p> <p>Staff members will be offered the opportunity to manually complete and sign a consent form on arrival (alongside privacy notice).</p>		
	<p>Transmission of virus as a result of poor social distancing etc</p>	<p>All members of school community</p>		<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 wearing face coverings.</p> <p>Test subjects will wait outside of the science block</p> <p>Staggered arrival times and provision made to separate bubbles.</p> <p>Slots are pre booked to ensure even spread of arrival/presence in the testing room.</p>		

				Supervision from school staff in place.		
Welcome & registration	Misuse of child's data Testing without parental consent or consent of staff member	Test subject (pupil or staff)		<p>Consent template to be completed by parent/carer before testing commences.</p> <p>11-15-year olds may self-swab (their nose and throat) 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 provided that site staff are satisfied that they're 'Gillick Competent' (able to consent to their own medical treatment without parent or guardian present). Parental consent will be sought for all students regardless of age</p> <p>Staff to complete consent forms</p> <p>Parents/carers, pupils and school staff to have access to Privacy Notice describing how their data will be used. This has been emailed alongside consent forms and is available on display at the registration desk.</p> <p>Test subject will not be permitted to enter 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)		<p>Testing Assistant present to provide verbal support as required. Two test assistants to cover two adjacent testing bays</p>		

				<p>Instructions provided in each swabbing area. Laminated A3 instructions in each test bay and at registration desk</p> <p>Mirror provided (on wall) to support self-swabbing. Have provided hand held Mirrors</p> <p>Staff trained to deal with potential issues eg: removal of nose piercing. But NOT to carry out swabbing.</p> <p>Completed as part of DFE training videos</p>		
	Injury or distress to pupil/staff during the swabbing process (Those not able to self-swab)	Test subject (pupil or staff)		<p>Trained person to support or carry out swabbing. (Further guidance and support to be provided – see updates on porta)</p>		
	Use of testing area by consecutive subjects leads to contamination.	All members of school community		<p>Subject to sanitise their hands on entry and leaving test cubicle/area. Will be given clear instructions</p> <p>Wipes to be provided to test subjects to clean down mirrors and areas that they have touched whilst in the cubicle. In place</p> <p>Bin in bay. In place</p>		
Sample Transport	<p>Contact with sample</p> <p>Contact between subjects and staff increasing the risk of transmission of COVID19:</p>	Test subject (pupil or staff)		<p>Staff to wear PPE as described in Schools and Colleges Handbook. In place with full training</p> <p>Samples to be transferred using receptacles provided.</p>		

				<p>Movement minimised wherever possible. Individual trays provided / one per test.</p> <p>Signage advises that test subjects must not enter processing area. In place</p>		
Sample processing and analysis	Contact between subjects and staff increasing the risk of transmission of COVID19:	All members of school community		<p>Access to area restricted to processing and recording staff only. All to be wearing PPE as described in Schools and Colleges Handbook. In place with full training</p> <p>Processing of samples to be completed by staff who have completed relevant training module ONLY. In place with full training</p> <p>Processing will be carried out following the process set out in the training. In place with full training</p> <p>Quality control measures in place as described in competency framework. Audits carried out by Covid Team Leader</p>		
Recording Process and disposal of sample	Cross contamination of samples. Contamination of Recorder from samples	Test subject (pupil or staff)		<p>One sample to be recorded at a time. Then SCAN LOG CLEAN for each sample. (As described in prescribed training). In place with full training</p> <p>Samples to be disposed of in medical bin (yellow bag). In place.</p>		
Incorrect result	Wrong samples miscoding of results	Test subject		2 identical barcodes are provided to subject at check in		

communication		(pupil or staff)		<p>3 barcodes actually provided. 3rd is kept in case of void/invalid result.</p> <p>The subject registers their details to a unique ID barcode before conducting the test.</p> <p>Barcode attached to a test card which contains subject name only. Remaining info is retrieved from our MIS.</p> <p>Barcodes are attached by trained staff at the sample processing area. In place with full training</p> <p>Barcodes are checked for congruence at the analysis station and applied to Lateral Flow Device at this station. In place with full training</p>		
Damaged barcode, lost LFD, failed scan of barcode	Orphaned record on registration portal & No result communicated to individual.	Test subject (pupil or staff)		<p>Subjects are called for a retest.</p> <p>In place with full training. 3rd barcode kept for this reason.</p>		
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>When the testing is part of routine weekly or mass testing, individuals can return to regular school or college activities. However, anyone tested as part of the daily/serial testing of contacts programme will need to wait somewhere before being allowed to begin normal school/college activities until they receive a negative test result. These holding spaces will be separated for each group of close contacts and</p>		

				cleaned after all individuals leave. Holding area in S3 if positive test recorded subject will be moved to Student workroom (student services) to await collection		
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 however school will need to take proactive action in the meantime). Unsure if this is true as NHS do not have participant contact data?</p> <p>A COVID-19 Test Register will be set up (this is mandatory). This will enable the school 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. In place.</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. Process in place to ensure this happens.</p>		

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)?
Clinical Waste Transfer	Waiting for clear guidance from Initial when and how storage and collection will occur	M Farley	Friday 08.01.2021	
Transport Issues	Liaison with BNES/NS should the need arise to segregate close contacts through serial testing cycle	J Seeley	Ongoing should need arise	

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 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 within an agreed timeframe. Reduce risk to a tolerable level.
LOW Risk	Monitor and review your rolling programme.