

## SCHOOL RISK ASSESSMENT COVID-19 National Testing Programme on-site

This risk assessment must be read and used in conjunction with the schools opening arrangements during  
COVID-19 general risk assessment



### PART A. ASSESSMENT DETAILS:

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

**Location of activity:** Mount Carmel RC High School – School Hall & Sports Hall

<b>School name: Address &amp; Contact details:</b>	Mount Carmel RC High School Wordsworth Road Accrington BB5 0LU	<b>Name of Person(s) undertaking Assessment:</b>	Mr B Georgy
		<b>Signature(s):</b>	
<b>Headteacher (Name/Title):</b>	MR X Bowers	<b>Date of Assessment:</b>	22 <sup>nd</sup> April 2021
<b>Signature:</b>		<b>Planned Review Date:</b>	31 <sup>st</sup> August 2021
<b>How communicated to staff:</b>	Email & website	<b>Date communicated to staff:</b>	22 <sup>nd</sup> April 2021

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

List of significant hazards (something with the potential to cause harm)	Who might be harmed	Type of harm	Existing controls (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, volunteers, 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>○ Coronavirus (Covid-19): guidance for schools and other educational settings</li> <li>○ LCC Schools HR guidance</li> </ul> </li> </ul>

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			<ul style="list-style-type: none"> <li>○ LCC Health &amp; Safety COVID-19 web page</li> <li>● Headteacher or other senior person keeps up to date with official COVID-19 Guidance 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, How to Guide Rapid Testing On-Site (ATS) in Secondary Schools and Colleges and the Clinical Standard Operating Procedure for Rapid Asymptomatic Testing in Secondary Schools and FE Colleges version 1 published 25.02.21.</li> </ul>
Insufficient resources to administer testing arrangements	Staff, pupils, volunteers, 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</li> <li>● School has around 800 pupils and 100 staff involved in the testing programme;</li> </ul>
Poor administration and implementation of testing programme	Staff, pupils, volunteers, 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 volunteers involved in the testing programme are aware of their role and have completed appropriate training as detailed under 5.2.2 of the SOP (Standard Operating Procedures);</li> <li>● A Quality Management Plan has been created by the designated Quality Lead who is supported by the school's senior leaders and who has undergone appropriate training for the role;</li> <li>● The Quality Assurance Checklist has been completed;</li> <li>● Serious incidents including those that require immediate pausing of all testing on site will be escalated immediately to the DfE helpline;</li> </ul>

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			<ul style="list-style-type: none"> <li>• Incidents that disrupt testing and/or could potentially impact quality of safety of testing and cannot be resolved locally will be reported to the DfE helpline;</li> <li>• Incidents that disrupt testing in any way but that are resolved locally will be reported to the DfE through the Incident Reporting Form on Gov.uk;</li> <li>• The Quality Lead has accountability for quality and risk management as detailed in section 8 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>○ Recording of all incidents including void results, errors and invalid tests rates by day and by operator;</li> <li>○ Recording and reporting of 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> <p><b>Duel Swabbing</b></p> <ul style="list-style-type: none"> <li>○ The School will encourage participation in secondary sample swabbing</li> </ul>

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			when requested to do so. However, it is understood that this is voluntary and no one will be forced to undertake a second swab.
Unsuitable testing environment	Staff, pupils, volunteers, visitors, contractors, household members	Transmission of the virus leading to ill health or potential death	<ul style="list-style-type: none"> <li>• Testing kits and PPE is stored securely indoors where a temperature of between 2-30°C can be maintained. LFDs will be removed from storage to an area with an ambient temperature of 15-30°C no later than 30 minutes before use;</li> <li>• The test site 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 – for example, a waiting room separate and adjacent to a testing room which allows for appropriate social distancing;</li> <li>• The test site has; <ul style="list-style-type: none"> <li>○ Sufficient space for appropriate social distancing;</li> <li>○ Easy to clean floor and surfaces;</li> <li>○ Resistant, non-absorbent flooring;</li> <li>○ Airflow and ventilation, no recirculation;</li> <li>○ Ambient temperature of 15-30°C for the LFD to operate; (2-30°C for storing them)</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> </ul> </li> </ul>

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			<ul style="list-style-type: none"> <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, volunteers, 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 in the school hall.</li> <li>● Testing is conducted on multiple participants in parallel, in separate testing bays, using a one-way system;</li> <li>● The school testing site includes a registration area, swabbing bays, processing area and recording area;</li> <li>● Dedicated test booths are a minimum of 1.2 x 1.2 m in dimension;</li> <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, mirror, hands free lidded waste bins, 70% alcohol-based hand rub dispenser, disinfectant wipes;</li> <li>● The swab receiving area (processing desk) 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>● Each swabbing station has a processing desk no more than 2 metres away;</li> </ul>

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			<ul style="list-style-type: none"> <li>The processing area contains a table, buffer solution, vials, LFD cartridges, test tube racks or equivalent for holding extraction tubes, hands free lidded waste bins/bin bags, wipes, timing clock(s), permanent marker pens; &amp; trays to be cleaned after each LFD batch has been transferred to the processing results table;</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>There is a clear division between the swabbing and processing areas. Individuals being tested are not permitted to enter the processing area;</li> </ul>
Failure to obtain consent from parents/guardians and staff	Staff, pupils, volunteers, 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;</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> </ul>
Lack of Personal Protective Equipment	Staff, pupils, volunteers, 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 volunteers 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 nitrile gloves, disposable plastic apron, fluid-resistant (Type IIR) surgical mask and eye protection with side shields. The apron, eye protection and</li> </ul>

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			<p>mask are 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>• The Test Assistant will not be administering the swab and is only supervising, therefore Test Assistants do not need to wear apron, gloves and visor, but will have immediate access to gloves if intervening;</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 test setting i.e. at a break or end of shift.</p>
Close contact between individuals during the testing process	Staff, pupils, volunteers, 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 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</li> </ul>

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			<p>wear face coverings;</p> <ul style="list-style-type: none"> <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 for brief lowering of their face covering/mask at time of swabbing;</li> <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> <li>• 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.</li> </ul> <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</li> </ul>



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			<p>being conducted unless there is a requirement to clean 'spillages'.</p> <ul style="list-style-type: none"> <li>In accordance with NHS guidance 'Cleaning and Disinfection process COVID-19' there is no close contact (within 2m) with other individuals and disposable gloves and fluid resistant surgical masks type IIR must be worn in all non COVID secure areas by cleaning staff;</li> </ul> <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, volunteers, 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 11.2.2 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>The cleaning wipes used meet the requirements indicated in the SOP cleaning policy and are effective against enveloped viruses;</li> <li>Cleaning wipes in use contain both disinfectant and detergent and have a secure lid to prevent the wipes from drying out which reduces their effectiveness. Manufacturer's instructions are followed to ensure appropriate contact time when using the wipes;</li> </ul>

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			<ul style="list-style-type: none"> <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>• Bodily fluids procedure in place and communicated to all test site staff;</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 spent minimal time, but which are not visibly contaminated with body fluids are cleaned thoroughly as normal;</li> <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>• 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>

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Incorrect use of testing equipment	Staff, pupils, volunteers, 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 the NHS and Government and available on the Document Sharing Platform;</li> <li>• Only staff who have been assessed as competent having undergone appropriate training will be permitted to commence testing roles;</li> <li>• Newly trained staff will practice using the testing devices during an on-site walkthrough;</li> <li>• Individuals are advised not to eat or drink for at least 30 minutes before taking the test to reduce the risk of spoiling the test;</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> <li>• Under circumstances where a pupil is unable to swab themselves such as due to physical or cognitive disability, 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>• Staff are not permitted to carry out assisted swabbing unless they have been trained and assessed as competent to undertake swabbing;</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> </ul>

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			<ul style="list-style-type: none"> <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 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> <li>• The Processing Operative will prepare the area in advance of receiving the sample and barcode from the subject, only process one sample at a time and watch no more than 5-6 samples at a time.</li> <li>• The test strip will be placed on a flat surface and not be moved during the test;</li> <li>• The test will not be left to develop for longer than 30 minutes as this will make the result void.</li> </ul>
Void Test Result	Staff, pupils, volunteers, visitors, contractors, household members	Transmission of the virus leading to ill health or potential death	<ul style="list-style-type: none"> <li>• Staff or pupils who return an invalid (or could not read sample) LFD result will repeat the test. If the second test is invalid, the individual will be instructed to arrange a PCR test.</li> </ul>
Cross contamination of samples	Staff, pupils, volunteers,	Transmission of the virus leading	<ul style="list-style-type: none"> <li>• School ensures all staff involved in processing of samples have undergone appropriate training in accordance with the information and advice</li> </ul>

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	visitors, contractors, household members	to ill health or potential death	<p>provided by the NHS and Government and available on the Document Sharing Platform;</p> <ul style="list-style-type: none"> <li>• The Processing Operative follows the step by step procedures as set out in the SOP under section 10.2.4</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> <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, volunteers, contractors, household members	Transmission of the virus leading to ill health or potential death	<ul style="list-style-type: none"> <li>• As a result of the revision to guidance agreed with DEFRA, Asymptomatic Test Site waste will be double bagged and disposed of through the mainstream waste disposal route.</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 product literature.</li> <li>• <b>PPE:</b> nitrile gloves which meet the Regulation (EU) 2016/425 and safety</li> </ul>

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			<p>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.</p> <ul style="list-style-type: none"> <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, volunteers, 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>• Individuals who have a positive LFD test result are advised to arrange a confirmatory PCR test immediately, undertaking the test within 2 days;</li> <li>• Whilst awaiting the result of the PCR test the individual and their close contacts and other members of their household, are advised to self-isolate immediately in line with NHS Test and Trace guidance;</li> <li>• If the PCR test is negative, the individual will be able to return to school and their close contacts can end their self-isolation;</li> </ul>

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			<ul style="list-style-type: none"> <li>• Close contacts will be asked to self-isolate for 10 days following a positive LFD test as per current Government guidance, including staff that have recently had a positive PCR test for COVID-19 within 90 days;</li> <li>• Staff and pupils who have recently had a positive PCR test for COVID-19, are likely to have developed immunity and are exempt from testing by both PCR and LFD within 90 days of a positive test, unless they develop symptoms. However, if they choose to participate in the LFD testing programme after completing their self-isolation period and they subsequently have a positive LFD test they will be required to self-isolate for a further 10 days or possibly longer if still symptomatic.</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 immediately possible, the pupil will be placed in a separate room until they can be collected, whilst being mindful of the individual pupils' needs;</li> <li>• In exceptional circumstances, if parents or carers cannot arrange to have their child collected, if age-appropriate and safe to do so the child will walk, cycle or scooter home following a positive test result. The individual will not use public transport;</li> <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> </ul>

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			<ul style="list-style-type: none"> <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;</li> <li>• Those contacts of positive cases are advised they must self-isolate in accordance with national guidance.</li> </ul>
Staff, pupils & household members displaying symptoms of COVID-19	Staff, pupils, volunteers, visitors, contractors, household members	Potential spread of infectious disease	<ul style="list-style-type: none"> <li>• The asymptomatic testing programme does not replace the current testing policy for those with symptoms. Anyone with symptoms (even if they recently had a negative LFD test result), will be advised to self-isolate immediately according to government guidelines and book a test.</li> </ul>



<b>PART B. HAZARD IDENTIFICATION AND CONTROL MEASURES:</b>			
<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)
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>• The Covid-19 Test Register is kept for a minimum of 14 days and is securely destroyed within 1 month of the testing programme ending to ensure compliance with Data Protection Law;</li> <li>• Arrangements for dealing with any breaches of GDPR are understood and adhered to by the Headteacher and School Business Manager.</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>