

Tunbridge Wells Girls' Grammar School - Risk Assessment: School Based Asymptomatic Testing

Introduction

This risk assessment relates the Asymptomatic Testing Program that was been announced by the Department for Education (DfE) for commencement in January 2021. The school-based programme will utilise the Lateral Flow Device (LFDs) rapid test. Based upon clinical evidence, these tests, when used effectively, can help identify people who have high levels of virus but who do not have symptoms and would not otherwise be coming forward for a test. It is therefore hoped that the chain of possible infection can be reduced through this school-based programme. This testing programme is only intended for potential asymptomatic pupils and staff. Symptomatic pupils and staff will be required to undertake standard offsite testing options.

The testing programme contains the following elements:

- **Asymptomatic Mass Testing - Return to onsite learning:** During the first week of term (week commencing 4th January) secondary schools are asked to set up testing sites and prepare to test as many pupils and staff as possible. The intention is that testing will begin as soon as possible but by the second week of term at the latest, with pupils who are children of critical workers, those defined as vulnerable and those who are in examination years being prioritised for early testing. Schools that have made the required preparations, as identified within the DfE/NHS guidance documentation and this risk assessment, may commence testing during the week commencing 4th January. With the third lockdown, this element of the programme has been delayed until pupils return to school, other than for children of critical workers and vulnerable children.

Individuals will undergo two tests spaced 3 to 5 days apart. The aim is to identify asymptomatic pupils and staff to reduce the level of potential infection within schools at the point at which there is a return to onsite learning in the Spring Term.

- **Asymptomatic Weekly Routine Testing - Staff:** After the initial mass testing, all secondary school staff will be able to have routine testing once a week. The aim is to identify asymptomatic staff to reduce the level of potential infection within schools.

An individual will only be told if they test positive on a 'lateral flow' test and will be advised that if they do not hear anything further, to assume it was negative. A small number of individuals may need to repeat the test if the first test was invalid or void for some reason.

Any pupil or member of staff who tests positive on the lateral flow test will need to leave school, self-isolate and take a further Polymerase Chain Reaction (PCR) test on the same day (or as soon as possible). The school will be able to provide these PCR test kits to perform at home, or a follow-up test may be booked via www.gov.uk/get-coronavirus-test or by calling 119. Individuals will be advised that if ordering a PCR test themselves, to visit a drive-through test site if possible, as

it is faster than requesting a home test. During the time while they wait for the PCR result, they will need to self-isolate. If the PCR test is positive, they will need to self-isolate for ten days from the point of the positive PCR test. If the PCR test is negative, they may return to onsite learning within school.

The risks and required control measures have been identified using DfE and NHS guidance. Our testing system has also been advised to our Public Liability Insurer.

Schools are required to:

- Identify any additional school-specific controls that may be required for operation; and
- Confirm all identified required control measures are in place.

| Identified Risk | Specific risk details | Required Control Measures | Complete |
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| Planning Time and Resources | The school is not able to plan and make the logistical arrangements required to facilitate the testing in the time provided | <ul style="list-style-type: none"> • The school has been able to utilise time within the first week of term (week commencing 4th January) to put the specified arrangements in place. • A Senior Leader has been identified to lead and oversee the school-based testing programme (LAW). • The school has put in place a quality management system, in line with DfE/NHS requirements, and has a designated Quality Lead who has accountability for quality and risk management of the testing programme. The Quality Lead has a clear escalation and decision mechanism process. • The school has a quality management plan in place prior to the start of the testing that meets the requirements of DfE guidance and includes the following elements: <ul style="list-style-type: none"> • Training • Observation of the testing process • Monitoring • Risk Assessment • Recording and Reporting • Testing is to start from 4th January and guidance, including consent forms, have been provided by the DfE. • Mass testing will commence once the correct logistical arrangements have been put in place to ensure a safe and effective testing facility. • Testing Staff have been provided with the DfE/NHS training modules and will be followed as required by applicable personnel – detailed further later. • Guidance documentation has been provided by the Trust and the DfE / NHS and will be followed in the establishment of the testing programme. • Schools have been provided with full details of the KIT that will be supplied within the NHS Test & Trace deliveries and the Kit that is required to be sourced locally. All required Kit has been secured. • First starter packs of up to 1,000 test kits, along with PPE and PCR tests will arrive at all secondary schools from 8am on 4th January – a member of staff has been identified to be on site to receive the delivery. Further deliveries will be received on 5th and 6th January. | |

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| Testing Location | The school does not have a suitable location within their estate to manage testing | <ul style="list-style-type: none"> • The school has identified a secure location for the safe storage of new testing kits (with a temperature of between 2°C and 30°C) and for the separate storage of clinical waste prior to collection. • The school has identified a testing location that meets the minimum space requirements. The Gym is not required for timetabled teaching and can accommodate testing bays and maintain social distancing requirements for all movements within the room, including the integration of a one-way system of movement for those attending testing (incorporating separate entrance and exits). Layout Options, as detailed within the NHS guidance document, will be used. • The location identified for testing has been calculated to have sufficient capacity to facilitate the scheduled programme. | |
| Testing location | The testing location may increase virus transmission | <ul style="list-style-type: none"> • The identified location will be able to meet cleaning requirements, i.e. non-porous floor and fully wipeable contact surfaces. • The identified location has all required cleaning materials accessible, which have been secured to ensure sufficient supply. • Any additional supplies costs will be reclaimed from the additional DFE funding for testing. • Cleaning of all surfaces, in line with COVID-19 protocols, will be undertaken between each test. • The DfE/NHS online training modules that are required to be undertaken and have successful assessments by all testing staff, include the following applicable modules which are applicable to reduce virus transmission: <ul style="list-style-type: none"> • Infection prevention and control measures • Cleaning protocols • Appropriate use of PPE • Test kit storage • How to deal with any contamination or other incidents • Waste management • All staff supporting the testing will be required to maintain social distance whilst pupils and staff self-administer the tests • Required PPE will be worn by staff who are supporting testing. The wearing and changing of PPE will be undertaken in line with NHS guidance and training provided. • All waste generated within the testing location will be disposed of in line with NHS guidance, including the use of yellow and Tiger bags (provided within the testing kit) for the identification of healthcare waste. • Arrangements have been made to collect the healthcare waste from the school site. • Spillages – any spillages are cleaned up immediately and thoroughly by staff in appropriate PPE. Testing in the affected area is paused until it is safe to continue. | |

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| | | <ul style="list-style-type: none"> • Only Asymptomatic pupils and staff can be tested. Symptomatic pupils and staff will be referred to offsite testing options. • All staff and pupil attending tests will be required to maintain social distance and wear face masks in line with existing requirements for communal areas. • All staff and pupils will be required to use hand sanitiser on arrival at the testing location. • All staff and pupils attending tests will use the identified one-way system as well as the distinct entrance and exit of the testing location. • Existing Year Group Bubbles will have distinct testing times. Staff social distancing and conduct will not impact upon bubble contamination. • Transfer of pupils from class to test location will be carefully supervised with socially distanced queuing. | |
| Staff Resources | <p>The school is not able to identify suitably trained and sufficient staff to undertake the testing roles required</p> | <ul style="list-style-type: none"> • A Senior Leader has been identified to lead and oversee the school-based testing programme to enable them to direct staff accordingly. • The required testing roles identified by the NHS to support the testing programme will be allocated to staff and volunteers. Staffing will be adequate to undertake the programme safely. • The small team required for the testing has been identified without the need to divert teaching staff from learning. • The testing team is made up of volunteers recruited from non-teaching staff or from the school community as a supporting 3rd party workforce. Testing roles will be allocated in line with DfE/NHS guidance to ensure identified responsibilities are with school staff only. • Staffing levels are sufficient to allow breaks for staff to reduce risk of errors due to fatigue. • All testing staff will either be DBS checked, through their school roles or work under direct supervision by TWGGS DBS cleared staff. Pupils will be supervised at all times by DBS cleared staff. • Additional resources of £15 per pupil have been identified by the DfE and will be accessed as required in line with the published DfE criteria. • The rapid testing type used requires low technical skills but is supported with training modules and guidance documentation from the DfE/NHS. • Prior to starting testing, all staff with roles will be specifically trained for the role they will execute using DfE/NHS resources via the online training and assessment platform that has been provided in line with stated requirements. • Only staff who have passed the assessments will be permitted to commence testing. A record of testing staff and their passing of the required modules will be kept by the school. • After the completion of training testing, staff are allowed time to practise onsite using the testing devices provided. • The DfE Competency Assessment has been completed for all staff roles to ensure their effective | |

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| | | <p>operation of the criteria within their role. Any areas of concern have been addressed with a review date set. The Assessments are filed and securely stored.</p> | |
| <p>Legal Considerations</p> | <p>The school has no legal right to undertake onsite testing and may be liable to legal challenge</p> | <ul style="list-style-type: none"> • The sharing of health data under the testing programme is being facilitated within Safeguarding powers under Section 175 of the Education Act 2002. This is referred to within the Privacy Notice that has been made available to pupils, parents, and Staff. A copy of this is available for viewing at the testing location reception. • The testing programme is recommended and supported, but not mandated. • Pupils and staff will not be required to participate in the Mass Testing programme. • Staff will not be required to participate in the Weekly Routine Testing programme. • Testing will not be undertaken on pupils or staff without their consent. • All pupils aged 16 years and under who are tested will also be required to have parental or legal guardian consent. • Tests will be self-administered, under adult supervision, to a participant’s own throat and nose. • Specific arrangements have been put in place for children with SEND to mitigate risk of harm through parental or legal guardian consent for adult assistance, if required. • Positive test results will be communicated individually in a location that provides privacy to pupils and staff. • Positive test results will also be communicated to the parents or legal guardians of those aged 16 or under. • Guidance on safe travel and additional precautions (regarding self-isolation, further testing, and family access to benefits) will be provided to those testing positive. • During the testing process anonymity will be provided through digital registration and the use of barcodes against samples. Positive tests will be matched against the digital record and known only to the COVID-19 Coordinator, Registration Assistant and Results Recorder. These roles are all required to be School staff and not 3rd party workforce. • The use of barcodes and the following of guidance regarding their correct use will prevent the miscoding of samples and results. • All electronic and paper record Personal Data associated with testing will be destroyed after 14 days, in line with Data Protection policy requirements. | |

TUNBRIDGE WELLS GIRLS' GRAMMAR SCHOOL - RISK ASSESSMENT

Location, activity, or issue being looked at: Lateral Flow Testing: General and clinical activities on the asymptomatic testing site for COVID-19 at TWGGS

Activities involved: traversing the site on foot
testing school staff and pupils

Date: 4th January 2021

| Hazard | What could go wrong? | Who may be harmed? | What is done now, that helps control the risk? | Risk Evaluation (post measures) | | | What, if any, extra controls need to be put in place? By when and whom? |
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| | | | | Probability | Severity | Risk | |
| Contact between subjects increasing the risk of transmission of COVID19 | Getting or spreading coronavirus (COVID-19), leading to ill health or potential death | Pupils, staff and volunteers | <ul style="list-style-type: none"> ● Asymptomatic: All subjects are to be advised in advance not to attend if they have any symptoms of COVID 19, or live with someone who is showing symptoms of COVID 19 (including a fever and/or new persistent cough) or if they have returned within 14 days from a part of the world affected by the virus or have been in close contact with someone who is displaying symptoms. ● Face masks: Prominent signage reminding attending subjects of the above to be displayed at the entrance to the building. ● Face coverings/masks to be worn by subjects at all times whilst on the premises except for brief lowering at time of swabbing. ● Requirement to wear face covering/mask to be reminded to all subjects in advance at time of test booking. ● Compliance with wearing of face covering/mask of all subjects to be visually checked on arrival by reception. ● Compliance with wearing of face covering/mask of all subjects to be visually checked through building by queue managers and all other staff. ● Hand hygiene: All subjects to use hand sanitiser provided on arrival & adherence to this enforced by reception staff. ● Social distancing: Two metre social distancing to be maintained between subjects with measured floor markings | Low | High | Tolerable | |

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| | | | <p>in place to ensure compliance in addition to verbal reminders if necessary from reception, queue management & sampling staff.</p> <ul style="list-style-type: none"> ● A one-way flow of subjects through the building is to be initiated and maintained at all times. ● Cleaning: Regular cleaning of the site including wipe down of all potential touchpoints in accordance with PHE guidance. ● Limited clutter-chairs only on request; no physical handing of documents to subjects except barcodes. | | | | |
| <p>Contact between subjects and staff increasing the risk of transmission of COVID19 : Welcome & registration</p> | <p>Getting or spreading coronavirus (COVID-19) , leading to ill health or potential death</p> | <p>Pupils, staff and volunteers</p> | <ul style="list-style-type: none"> ● Face masks: Prominent signage reminding attending subjects of the above to be displayed at the entrance to the building. ● Face coverings/masks to be worn by subjects at all times whilst on the premises except for brief lowering at time of swabbing. ● Compliance with wearing of face covering/mask of all subjects to be visually checked on arrival by reception ● Compliance with wearing of face covering/mask of all subjects to be visually checked through building by queue managers and all other staff. ● Hand hygiene: All subjects to use hand sanitiser provided on arrival & adherence to this enforced by reception staff. ● 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. ● A one-way flow of subjects through the building is to be initiated and maintained at all times. ● Cleaning: Regular cleaning of the site including wipe down of all potential touchpoints in accordance with PHE guidance. ● Limited clutter-chairs only on request; no physical handing of documents to subjects except barcodes. ● Registration Assistant to wear PPE. | <p>Low</p> | <p>High</p> | <p>Tolerable</p> | |

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| <p>Contact between subject and sampler increasing the transmission of COVID19: <u>Sample taking</u></p> | <p>Getting or spreading coronavirus (COVID-19) , leading to ill health or potential death</p> | <p>Pupils, staff and volunteers</p> | <ul style="list-style-type: none"> ● Hand hygiene: All subjects to use hand sanitiser provided on arrival & adherence to this enforced by reception staff. ● 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. ● A one-way flow of subjects through the building is to be initiated and maintained at all times. ● Cleaning: Regular cleaning of the site including wipe down of all potential touchpoints in accordance with PHE guidance. ● Limited clutter-chairs only on request; no physical handing of documents to subjects except barcodes. ● Test Assistant to wear PPE | <p>Low</p> | <p>High</p> | <p>Tolerable</p> | |
| <p>Contact between sample and test centre runner increasing the transmission of COVID19: <u>Sample transport</u></p> | <p>Getting or spreading coronavirus (COVID-19) , leading to ill health or potential death</p> | <p>Pupils, staff and volunteers</p> | <ul style="list-style-type: none"> ● Hand hygiene: All subjects to use hand sanitiser provided on arrival & adherence to this enforced by reception staff. ● 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. ● A one-way flow of subjects through the building is to be initiated and maintained at all times. ● Cleaning: Regular cleaning of the site including wipe down of all potential touchpoints in accordance with PHE guidance. ● Limited clutter-chairs only on request; no physical handing of documents to subjects except barcodes. ● Test Assistant to wear PPE | <p>Low</p> | <p>High</p> | <p>Tolerable</p> | |
| <p>Contact between samples and sample testers increasing the transmission of COVID19:</p> | <p>Getting or spreading coronavirus (COVID-19) , leading to ill health or potential death</p> | <p>Pupils, staff and volunteers</p> | <ul style="list-style-type: none"> ● Hand hygiene: All subjects to use hand sanitiser provided on arrival & adherence to this enforced by reception staff. ● 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. ● A one-way flow of subjects through the building is to be | <p>Low</p> | <p>High</p> | <p>Tolerable</p> | |

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| <u>Sample processing & analysis.</u> | | | <p>initiated and maintained at all times.</p> <ul style="list-style-type: none"> ● Cleaning: Regular cleaning of the site including wipe down of all potential touchpoints in accordance with PHE guidance. ● Limited clutter-chairs only on request; no physical handing of documents to subjects except barcodes. ● Processor to wear PPE | | | | |
| Contact between samples and sample testers increasing the transmission of COVID19: <u>Sample disposal and waste disposal</u> | Getting or spreading coronavirus (COVID-19) , leading to ill health or potential death | Pupils, staff and volunteers | <ul style="list-style-type: none"> ● Hand hygiene: All subjects to use hand sanitiser provided on arrival & adherence to this enforced by reception staff. ● 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. ● A one-way flow of subjects through the building is to be initiated and maintained at all times. ● Cleaning: Regular cleaning of the site including wipe down of all potential touchpoints in accordance with PHE guidance. ● Limited clutter-chairs only on request; no physical handing of documents to subjects except barcodes. ● Test Assistant and Processor to wear PPE ● All disposable items to be put into the correct bags/bins as per guidance | Low | High | Tolerable | |
| Incorrect result communication | Wrong samples or miscoding of results | Pupils and staff | <ul style="list-style-type: none"> ● 2 identical barcodes are provided to subject at check in ● The subject registers their details to a unique ID barcode before conducting the test ● Barcodes are attached by trained staff at the sample collection bay ● Barcodes are checked for congruence at the analysis station 1 and applied to Lateral Flow Device at this station | Low | Very high | Tolerable | |
| Damaged barcode, lost LFD, failed scan of barcode | Orphaned record on registration portal; no result communicated to individual | Pupils and staff | <ul style="list-style-type: none"> ● Rule based recall of subjects who have not received a result within 12 hrs of registration ● Subjects are called for a retest | Low | High | Tolerable | |
| Extraction | These | Testing | <ul style="list-style-type: none"> ● PPE: nitrile gloves which meet the Regulation (EU) 2016/425 | Low | Medium | Low | |

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| <p>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>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 developmental toxicity, carcinogenicity, and medical conditions aggravated by exposure.</p> | <p>staff and volunteers</p> | <p>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> <ul style="list-style-type: none"> ● Environmental: do not let product enter drains ● Spillages: wipe surfaces which the solution has been spilt on and dispose of cleaning material in line with the lab's waste disposal procedures ● Do not use if the solution has expired ● Training to be provided in handling potentially biohazardous samples, chemicals and good lab practice. Adhere to guidelines in these training procedures to prevent improper handling. ● Follow procedures on the MSDS form provided by Innova to mitigate against inhalation, skin contact or ingestion of these chemicals. | | | | |
| <p>Occupational illness or injury</p> | | <p>Testing staff and volunteers</p> | <ul style="list-style-type: none"> ● All training undertaken and adhered to. ● Regular quality control checks to ensure adherence | <p>Low</p> | <p>Low</p> | <p>Low</p> | |
| <p>Manual handling</p> | | <p>Testing staff and volunteers</p> | <ul style="list-style-type: none"> ● All significant manual handling to be carried out by site team, who have been appropriately trained. | <p>Low</p> | <p>Low</p> | <p>Low</p> | |

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| Unauthorised access by members of the public | | Pupils, staff and volunteers | <ul style="list-style-type: none"> • Access to the Gym is through Reception, through the main body of the school or through the enclosed courtyard • Site kept secure; locked when not in use. Keys limited to relevant staff. • Appropriate signage preventing access. | Low | Low | Low | |
| Uneven surfaces (floor protection in the Testing and Welfare areas) | | Pupils, staff and volunteers | <ul style="list-style-type: none"> • Not applicable – gym floor even | Low | Low | Low | |
| Stairs to / from sample processing / registration area and welfare space | | Pupils, staff and volunteers | <ul style="list-style-type: none"> • Not applicable – ground floor | Low | Low | Low | |
| Inclement weather | | Pupils, staff and volunteers | <ul style="list-style-type: none"> • Not applicable – indoor testing and waiting areas. | Low | Low | Low | |
| Electrical safety / plant & equipment maintenance Defective electrical equipment | | Testing staff and volunteers | <ul style="list-style-type: none"> • All equipment has been PAT tested | Low | Low | Low | |
| Use of shared equipment | | Testing staff and volunteers | <ul style="list-style-type: none"> • Infection control procedures followed • Clear workspace policy, and staff cleaning after use • Universal silicone keyboard covers used for IT equipment and cleaned after use • Appropriate PPE worn | Low | Medium | Low | |

| Control Improvements | | | | |
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| Action No | Recommended additional control measures | Responsibility | Target Date | Date completed |
| 1 | Content of the risk assessment to be communicated with all workers as part of induction | Covid Coordinator | 08/01/21 | 13/01/2021 |
| 2 | Reminders to all workers on a regular basis including slips, trips, falls and complacency | Covid Coordinator | Each session | |

| Declaration - If the above control measures are implemented the risks posed by the task / process / environment assessed will be controlled to as low as is reasonably practicable. | |
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| Persons involved in assessment | Julie Robinson/ Debbie George/ Louise Stewart-Smith |
| Signature of Lead Assessor | Linda Wybar Date 07/01/2021 |

| Reviews – this assessment should be reviewed at intervals no greater than 12 months or when there are changes in operational procedure, personnel, the work environment or following an incident | | | | | | | |
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