



**The Dean Trust COVID-19 Onsite Lateral Flow Mass Testing Risk Assessment
(last updated on 4th March 2021 to incorporate an addendum for Staff Home Testing (from page 11))**

IDENTIFYING, EVALUATING AND MANAGING RISKS

This School Risk Assessment Plan has been written with the understanding that 'risk' can be mitigated but not eliminated. The Trust will continue to, as defined in the Health and Safety at Work Act 1974, do 'what is reasonably practicable to do' to safeguard our staff and pupils.

GUIDANCE FOR EVALUATING THE RISK MATRIX:

LEGEND	
I	Impact
P	Probability
I x P	Risk Rating

To establish the risk rating, it is necessary to multiply the perceived consequence (or impact) of the risk (score 1 - 5) with the perceived likelihood (or probability) of that risk occurring (score 1-5). Please see tables below for guidance on risk rating scores.

Impact (or Consequence)	
Description	Indicators
5 (Major)	The risk has a major impact if realised
4 (Significant)	The risk has a significant impact if realised
3 (Moderate)	The risk has a moderate impact if realised
2 (Minor)	The risk has a minor impact if realised
1 (No consequence)	The risk has no consequence impact if realised

Probability (or Likelihood)	
Description	Indicators
5 (Very Likely)	The risk will emerge
4 (Likely)	The risk should emerge
3 (Unlikely)	The risk could emerge
2 (Very Unlikely)	The risk is unlikely to emerge
1 (Impossible)	The risk will not emerge

Score	Risk Description	Action Required
25	Extreme Risk	<input type="checkbox"/> Immediate escalation to Headteacher for risk control activities
20 - 15	High Risk	<input type="checkbox"/> Risk to be actively managed with appropriate risk control activities
12 - 6	Medium Risk	<input type="checkbox"/> Take appropriate action to manage the risk
5 and below	Low Risk	<input type="checkbox"/> Risk to be removed from register with monitoring activity to assess changes in risk rating

Context

Following the identification of a new strain of coronavirus and a rapid increase in infections in England during December 2020, the Government requested that all schools engage with onsite mass lateral flow testing to support the tracing and control of COVID-19 from January 2021.

Public Health Aims

Active Case Finding

Identify positive cases of COVID-19 and ensure they self-isolate to reduce transmission to other people;

Enablement

Reduce absences and minimise impact on education continuity by allowing asymptomatic contacts who test negative on repeated daily contact testing to return to daily activities.

Surveillance

Provide further information on asymptomatic transmission in addition to the ongoing COVID19 surveillance in the school population and targeted local public health response with LAs to prevent spread to the wider community.

Public Health England and the Health and Safety Executive require this documentation to ensure end to end health, safety and infection control risks for mass lateral flow testing are identified, pre-assessed, managed and monitored regularly by the site owners and testing operators.

The Dean Trust has built this Risk Assessment around the template that was provided to schools to ensure compliance with what is recommended by Public Health England and the Health and Safety Executive. The Dean Trust has also utilised the DfE's 'document sharing platform' which includes resources to support the roll out of mass testing.

This includes: The workforce planning tool – to calculate how many staff you need to set up the test site, a 'How to Guide for Rapid Testing (operational guidance), Training Guide for Rapid Testing, NHS Test and Trace Digital Handbook, Competency checklist for key roles, video to support setting up a testing site, sample Quality Checklist, consent form, Risk Assessment Template, model privacy notices and data protection FAQs for parents.

This COVID-19 School Onsite Mass Lateral Flow Testing Risk Assessment is applied alongside The Dean Trust Full Opening of Schools Risk Assessment – Coronavirus.

We will follow the same process of consultation with Trust Board, Executive Team, the Trust's Health & Safety Consultant Mandy Disney of AD-Safety (the 'competent person(s)' as defined by the Management of Health and Safety at Work Regulations 1999), Trust school Governing Bodies, Unions, Headteachers and Staff, and share with our parents and communities via our websites. We understand the importance that all stakeholders have a comprehensive understanding of the risks, associated risk controls, the Trust's expectations and aspirations, and feel safe, valued and able to return to a thriving school community.

Risk Description	I	P	Risk Rating	Risk Control(s) Please note: The term 'subjects' is used to reference pupils, students and staff.	I	P	Risk Rating	Lead for Risk Control Activities
Contact between subjects increasing the risk of transmission of COVID19								
Transmission of the virus leading to ill health or potential death	4	3	12	<p>Asymptomatic: All subjects are advised in advance not to attend school 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.</p> <p>Face masks: Subjects informed that they must wear face masks (pupils/students) and visors/face masks (staff) in internal communal areas including corridors, dining areas (unless sat down and eating/drinking) and in the COVID-19 Lateral Flow Testing Area. Subjects will need to briefly lower face coverings/masks at time of swabbing. Compliance with wearing of face covering/mask is the responsibility of all staff and anyone not adhering (with the exception of those who are exempt from wearing a face-</p>	4	2	8	Headteacher Site manager

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				<p>covering) must be reported to a member of the Senior Leadership Team and/or a member of the COVID-19 onsite testing team</p> <p>Hand hygiene: All subjects to use hand sanitiser provided on arrival and adherence to this enforced by all staff and the COVID-19 onsite testing team.</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 where necessary.</p> <p>Movement: A one-way flow of subjects through the onsite COVID-19 Lateral Flow Testing Area is to be initiated and maintained at all times. Compliance with this is to be ensured by queue management staff.</p> <p>Cleaning: Regular cleaning of the site including wipe down of all potential touchpoints in accordance with PHE guidance.</p> <p>As a result: contact between subjects as part of the testing process is minimised thus minimising the risk of transmission between subjects.</p>				
Contact between subjects and members of the COVID-19 Lateral Flow Onsite Testing Team increasing the risk of transmission of COVID19								
Transmission of the virus leading to ill health or potential death	4	3	12	<p>Training: All members of the COVID-19 Lateral Flow Testing Area team i.e. Quality Lead/Team Leader, Test Assistant, Processor, COVID-19 Coordinator, Registration Assistant, Results Recorder and Cleaner have read the 'COVID-19 National Testing Programme: Training Guide Rapid Testing for Schools and Colleges' presentation. They have also accessed the online training for their specific role and duties and have 'passed' the knowledge assessment at the end of on-line training. As a result, they understand their tasks and responsibilities and are equipped to carry them out effectively.</p> <p>A 'dry run' has been conducted by the team prior to starting testing and there is an ongoing cycle of Quality Assurance, led by the Quality Lead/Team Leader, using the appropriate competency checklist, provided by Public Health England/NHS, for each</p>	4	2	8	Quality Lead/Team Leader Headteacher

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				<p>role. Any concerns with practice will instigate an immediate halt to testing until the concern is addressed and health and safety of all subjects and the testing team can be assured.</p> <p>A weekly record is maintained of checks that have taken place, issues identified and addressed, and lessons learnt.</p> <p>Testing Area Layout: COVID-19 Lateral Flow Testing Area layout adopted from recommended layouts within the 'How To Guide' – Rapid Testing in School and Colleges' document. Limited clutter-chairs only on request; no physical handing of documents to subjects except barcodes and PCR test kits for first 200 subjects.</p> <p>PPE for COVID-19 Lateral Flow Testing Team: All team members will be given and trained to wear the appropriate PPE as recommended by Public Health England/NHS for their duties e.g. disposable gloves, disposable plastic aprons, fluid-resistant surgical masks and eye protection (goggles or visors). Those doing sample processing roles need to change gloves after each sample following the appropriate PPE guides. Other PPE should be replaced between test sessions e.g. at the end of the morning session before lunch, except for specific roles. Instructions for applying and removing PPE safely can be found within the 'How to Guide' presentation on slides 23 and 24.</p> <p>As a result: transmission of COVID-19 through the testing process is minimised.</p>				
Incorrect result communication.								
Wrong samples or miscoding of results	4	3	12	<p>2 identical barcodes are provided to subject at check in</p> <p>The subject registers their details to a unique ID barcode before conducting the test</p> <p>Barcodes are attached by trained staff at the sample collection bay</p> <p>Barcodes are checked for congruence at the analysis station 1 and applied to Lateral Flow Device at this station</p> <p>As a result: the possibility of incorrect results being recorded is minimised.</p>	4	2	8	<p>Quality Lead/Team Leader</p> <p>Registration lead</p>

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Damaged barcode, lost LFD, failed scan of barcode								
Orphaned record on registration portal and no result communicated to individual	4	3	12	Rule based recall of subjects who have not received a result within 8 hrs of registration Subjects are called for a retest As a result: the possibility of incomplete results being recorded is minimised.	4	2	8	Quality Lead/Team Leader Results Recorder
Extraction solution which comes with the lab test kit contains the following components: NA2HPO4 (disodium hydrogen phosphate), NaH2PO4 (sodium phosphate monobasic), NaCl (Sodium Chloride)								
Whilst we have been informed that '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	3	3	9	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. 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. As a result: The possibility of an adverse reaction to any chemical being used is minimised.	2	2	4	Quality Lead/Team Leader

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and developmental toxicity, carcinogenicity, and medical conditions aggravated by exposure', there may be an adverse reaction by an individual.								
Occupational illness or injury								
Staff exhibiting / feeling effects that may indicate COVID-19 is present.	3	3	9	<p>All staff in school knowledgeable of Trust Risk Assessment Plan for Coronavirus which includes recognising symptoms and appropriate handling of themselves and others displaying these symptoms.</p> <p>COVID-19 Lateral Flow Testing Team all trained for their role and responsibilities including recognising symptoms and appropriate handling of themselves or others displaying these symptoms.</p> <p>Staff to remove themselves immediately from the test centre and school and to follow external testing and isolation procedures.</p> <p>As a result: all staff recognise symptoms of COVID-19 on themselves and others and the immediate action that must be taken to minimise the risk of virus transmission to others.</p>	3	2	6	<p>Headteacher</p> <p>Quality Lead/Team Leader</p>
Manual handling								
Injury caused by incorrect manual handling techniques e.g. attempting to	3	3	9	<p>Any site staff managing large orders (e.g. on pallets) are trained in safe manual handling.</p> <p>All materials for testing are divided into small lightweight packages.</p> <p>Information for correct usage provided.</p>	3	2	6	<p>Site Manager</p> <p>Quality Lead/Team Leader</p>

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lift beyond capability.				As a result: the risk of any person receiving an injury due to incorrect manual handling is minimised.				
Unauthorised access by members of the public								
Safeguarding risk to staff, pupils and students.	4	3	12	<p>Secure sites with secure entry procedures to school/COVID-19 Lateral Flow Testing Area in place. Reception continually supervised.</p> <p>Only authorised access permitted to the building.</p> <p>Visitors wear authorised identification and lanyards at all times.</p> <p>Any visitors not DBS checked will be supervised at all times by at least one member of school staff (who are all DBS checked)</p> <p>As a result: the school site is secure from non-authorised individuals.</p>	4	2	8	Headteacher Quality Lead / Team Leader
Authorised visitors to the site, e.g. members of the COVID-19 Lateral Flow Testing Team, being unfamiliar with the site and relevant policies and behaviour expectations								
Authorised staff put themselves or others at risk in terms of health, safety and/or wellbeing.	4	3	12	<p>All members of the COVID-19 Lateral Flow Testing Team are trained according to their role and responsibilities.</p> <p>All members of the team are DBS checked or are initially continually supervised by at least one DBS checked person until their DBS check comes through.</p> <p>All members of the team are asked to read Keeping Children Safe In Education Part One, are trained in school behaviour expectations and appropriate policies and procedures, including what to do in the event of an emergency.</p> <p>Welfare space provided for members of the COVID-19 Lateral Flow Testing Team, including Toilet and hand-washing facilities.</p> <p>As a result: all authorised staff are equipped, confident and comfortable on the school site to deliver safe and effective onsite COVID-19 lateral flow testing. Their understanding of school</p>	4	2	8	Headteacher Quality Lead / Team Leader

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				behaviours and expectations supports the maintenance of the health, safety and wellbeing of others e.g. staff, pupils and students.				
Uneven / 'Slippy' surfaces (floor protection in the Testing and Welfare areas)								
Trip / slip hazards	2	3	6	<p>The COVID-19 Lateral Flow Test Centre has been checked for uneven surfaces and other trip hazards. Any trip hazards addressed.</p> <p>The COVID-19 Lateral Flow Test Centre will be continually monitored for any spillages. These areas will be clearly signed, sectioned off and wiped. They will only be put back into use when dry. Any chemical spillages will be cleaned using appropriate solutions and materials.</p> <p>As a result: there is minimal risk to anyone receiving an injury due to and trip or slip hazards.</p>	2	2	4	Quality Lead / Team Leader Site Manager
Electrical safety / plant & equipment maintenance. Defective electrical equipment								
Failure of equipment due to poor maintenance. Electric shock from faulty equipment. Failure to accurately record	3	2	6	<p>All electrical inspection and testing, e.g. including Portable Appliance Testing, is legally and Health and Safety Executive compliant.</p> <p>Onsite IT engineers/IT Support Assistants to address any electronic recording and processing of information issues.</p> <p>As a result: the risk to a person or systems to effectively deliver onsite COVID-19 mass lateral flow testing is minimised.</p>	2	2	4	Site Manager IT Support Team Quality Lead / Team Leader

Risk Description	I	P	Risk Rating	Risk Control(s) Please note: The term 'subjects' is used to reference pupils, students and staff.	I	P	Risk Rating	Lead for Risk Control Activities
and process testing activity.								
Use of shared equipment								
Cross contamination of equipment increasing the possibility of COVID transmission	4	3	12	<p>Shared equipment will be discouraged within the COVID-19 Lateral Flow Test Centre.</p> <p>Appropriate PPE worn for the role and responsibility of each member of the COVID-19 Lateral Flow Test Team.</p> <p>In the unlikely event of equipment sharing, strict sanitisation guidelines will be adhered to.</p> <p>As a result: the risk of contamination through the use of shared resources is minimised.</p>	4	2	8	<p>Quality Lead/Team Leader</p> <p>COVID-19 Lateral Flow Test Team</p>
Waste Management: 'Healthcare waste' (the term given by the NHS and DfE to the waste produced from the mass lateral flow onsite testing process) has not been disposed of in the manner described in NHS and DfE guidance.								
The Health and Safety of onsite staff and pupils or waste management collectors is compromised	4	3	12	<p>Only authorised personnel, e.g. testing team, site staff and/or cleaners, cognisant of healthcare waste management protocols to be involved in the transportation of waste bags to the appropriate storage/collection point.</p> <p>All lateral flow device packaging and general waste is packaged in a black general waste bag using existing route collection.</p> <p>Swabs and tissues are packaged in an unmarked yellow / clear bag. Check with existing waste disposal contractor if they are able to collect healthcare waste from testing.</p> <p>Cartridges are packaged in an unmarked yellow / clear bag. Check with existing waste disposal contractor if they are able to collect healthcare waste from testing.</p> <p>Personal Protective Equipment, Mop Heads, Cloths are packaged in a Tiger bag (black and yellow vertical stripes). Check with existing waste disposal contractor if they are able to collect healthcare waste from testing.</p>	4	2	8	<p>Quality Lead/Team Leader</p> <p>Site Manager</p>

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The Trust is publicly liable for legal challenge and associated costs including damages.	3	3	9	<p>Public Liability and Indemnity – The Department for Education has confirmed that the Risk Protection Arrangement for schools will indemnify members in the event a claim is brought by a third party (including pupils) or employees, subject to the usual RPA Membership Rules and its terms, conditions and limitations. It is a requirement that risk assessments are undertaken, recorded and adhered to.</p> <p>Only those subjects providing consent (Consent form for COVID-19 testing in secondary schools and colleges from the DfE Document Sharing Platform used) will participate in testing.</p> <p>Model privacy notices and Data protection FAQs for parents will also be shared as Consent is sought prior to testing.</p> <p>As a result: The Dean Trust is not vulnerable to legal challenge from any subject or their families.</p>	3	2	6	Executive Team on behalf of The Trust Board
Staff Home Testing Risk Assessment – 4th March 2021								
Stock Shortages (LFD kits)	3	3	9	Registration assistants will monitor stock levels and notify Covid-19 Coordinator if stocks are low. Coordinator will inform DfE 0800 046 8687	3	2	6	Quality Lead/Team Leader Covid-19 Coordinator Registration Assistants
Failure to follow agreed Standard Operating Procedures: Unavailable storage between 2-30 degrees C for LFD kits.								
Validity of testing is jeopardised.	4	3	12	All deliveries will be immediately transported to control temperature area on arrival to site.	4	2	8	Quality Lead/Team Leader Site Manager

Risk Description	I	P	Risk Rating	Risk Control(s) Please note: The term 'subjects' is used to reference pupils, students and staff.	I	P	Risk Rating	Lead for Risk Control Activities
Failure to follow Standard Operating Procedures - LFD ordering, distribution management and tracking of LFD kits.								
Ineffective ordering, organisation and distribution of kits leading to shortage and/or reduced LFD testing capacity. Results in possible un-identification of asymptomatic cases increasing transmission.	4	3	12	<p>Stock levels routinely monitored.</p> <p>Replacement LFT kits are ordered in a timely manner.</p> <p>Participating staff are informed of who is co-ordinating and monitoring home testing activity. Incidents whilst using kits are reported immediately to this person.</p> <p>Test Kit Log is used to record 'lot' numbers and confirms issue of correct instructions. Participating staff collecting test kits sign the Test Kit Log to confirm receipt and are advised how to report their test result. Registration assistants will complete this with consent from participant.</p>	4	2	8	<p>Quality Lead/Team Leader.</p> <p>Registration Assistant.</p>
Testing capacity reduced, errors made in recording and increased transmission risk.	4	3	12	<p>Registration assistants have accessed the online training for their specific role and duties and have 'passed' the knowledge assessment at the end of on-line training. As a result, they understand their tasks and responsibilities and are equipped to carry them out effectively.</p> <p>Registration assistants will distribute kits in suitably ventilated area.</p> <p>Registration assistant will robustly record and track testing kits.</p> <p>Face masks will be worn. Sanitising systems in place and adhered to. Social distance maintained and one-way system in place.</p>	4	2	8	<p>Quality Lead/Team Leader.</p> <p>Registration Assistant.</p>

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Failure to follow Standard Operating Procedures - LFD home storage and disposal of test kits.								
Inappropriate storage and disposal of test kits at home creates a health & safety risk to children, vulnerable adults, pets, and jeopardises the validity of testing.	4	3	12	<p>Test kits are stored out of reach of children, other vulnerable individuals and pets.</p> <p>Test kits are stored at room temperature or in a cool dry place (2-30 degrees C).</p> <p>Test kits must not be stored in a fridge or freezer or left in direct sunlight.</p> <p>If the kit has been stored in a cool area (less than 15 degrees C) it has been at room temperature for 30 minutes (15-30 degrees C) before it is used by the participant.</p> <p>All items of the test kit are placed in the waste bag on completion of the test. This is placed in the domestic refuse.</p> <p>Any spillages of test solution are absorbed by wiping with a paper towel or tissue and placed in the waste bag.</p> <p>The participant washes/sanitises their hands before & after testing, and cleans surfaces that are used for testing.</p>	3	2	6	Participant.
Challenges with effectively carrying out throat and mid-turbinate nasal swab								
Participant failure to use swab correctly jeopardising the validity of testing and/or causing injury or discomfort.	4	3	12	<p>A complete box of 7 test kits is provided to each participant - adequate supplies for 2-3 weeks of home testing.</p> <p>Participants must not eat or drink for 30 minutes prior to the test.</p> <p>Any damaged swab/test packaging is not used, and its non-use reported.</p> <p>Participants do not re-use any of used/damaged test kits.</p> <p>Instructions have been provided to participants with the box of LFT swabs.</p> <p>This provides guidance and illustrations on how to use the swab in throat and nose.</p> <p>Participants have had guidance by staff in showing them how to self-swab and must consistently follow the instructions.</p>	3	2	6	Participant.

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				Participant has available clean flat surface for using test kit and a timing mechanism available. Participant must wash or sanitise hands, use a tissue, and wash or sanitise hands again before opening swab packet.				
Participants suffer an allergic reaction.	4	3	12	Swabs in the Innova SARS-CoV-2 Antigen Rapid Qualitative Test kit are latex free. Participant to report any allergic reaction as a 'yellow card incident' to the MHRA and to the school.	4	2	8	Participant.
Failure to follow Standard Operating Procedures - reporting testing outcomes.								
Incorrect reporting and recording procedures e.g. participants only report positive results from LFD testing.	4	3	12	Participants are informed to report positive and void test results to the school. Information collated on spreadsheet by admin assistant. Participants receiving test kits are advised how to report their test results online when they collect them. Participants register the test online on the Covid-19 Test and Trace website (school may assist if internet access if not available). Participants must report all test results (positive, negative or void) to Covid-19 Test and Trace website or by telephone as per the instructions in the home test kit. Participants correctly report the test kit ID number. Where positive, participants must follow national isolation guidance with their household. The school updates their Covid-19 register if there is a positive Covid-19 result and seeks advice from the Local Outbreak Control Team regarding isolation of other contacts if needed. School tracks and escalates emerging issues, repeated incidents or patterns of concern to DfE Health Protection Team, Local Authority and Covid-19 Track and Trace.	4	2	8	Quality Lead/Team Leader. Registration Assistant. Participant.

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Incident escalation protocols and feedback loop (LFD test reporting).								
Failure to use test correctly may jeopardise the validity of testing and cause injury or discomfort	4	3	12	<p>Participants are advised to report any concerns/incidents with the test kit to the school e.g. damaged kit, multiple void tests, unclear results, inability to record results to the school and by telephoning 119.</p> <p>Incidents requiring medical care should be reported by contacting 111 or 999</p> <p>Clinical incidents with the potential for harm e.g., a swab breaking in the mouth, or an allergic reaction is reported by the participant as a yellow card concern to the MHRA</p> <p>Spreadsheet for recording incidents set up and incidents tracked.</p>	4	2	8	<p>Quality Lead/Team Leader.</p> <p>Registration Assistant.</p> <p>Participant.</p>
Asymptomatic testing impact on business delivery								
Managing school and curriculum continuity with increase in number of cases and staff self-isolating	3	3	9	<p>Staff to inform Headteacher/HR immediately of positive results.</p> <p>Covid-19 response protocols in place including arrangement of cover.</p> <p>Scheduling of testing is organised to meet operational requirements.</p> <p>Refer to Trust Covid-19 Risk Assessment.</p>	3	2	6	<p>Headteacher.</p> <p>HR Assistant.</p> <p>Participant.</p>
Impact of asymptomatic testing								
Parents/Carers are concerned due to increase in number of cases and staff self-isolating.	3	3	9	<p>Parents/Carers communicated with regularly via CEO, Headteacher and School correspondence.</p> <p>Risk assessments (Trust and at local school level) updated and shared regularly</p> <p>Communication with staff and parents if a positive case is recorded as per Covid-19 Risk Assessment</p> <p>Close contacts will be required to self-isolate</p>	2	2	4	<p>CEO</p> <p>Headteacher</p> <p>Operations Director</p>

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Poor participation with LFD home testing increases transmission risk	4	3	12	<p>Whilst participation in home testing is voluntary and by consent, the Trust is encouraging of staff participation.</p> <p>The Trust and schools promote the use of Lateral Flow (LFT) test kits with staff by providing information and training and support. Participants are advised of how the test data will be used and have received a copy of the privacy notice.</p> <p>Those staff not wishing to participate in home-testing and who do not display symptoms can attend school.</p> <p>LFD tests are approved by the MHRA for the purpose of staff testing.</p>	4	2	8	<p>Operations Director</p> <p>Headteacher</p> <p>Quality Lead/Team Leader.</p>