

APPENDIX C: Lateral Flow Testing Risk Assessment

Why is this document needed: 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

Assessment Date		Lead Assessor		Contract		Assessment Number	
Activity / Task							
Description of task / process / environment being assessed	General and clinical activities on the asymptomatic testing site						
Activities Involved	Traversing the site on foot Testing staff and students					Location	
Who Might be affected	Employee ✓	Client ✓	Contractor ✓	Visitor ✓	Service User ✓		
THIS RISK ASSESSMENT MUST BE USED ALONGSIDE THE INDIVIDUAL ACADEMY Covid-19 OPERATIONAL MANAGEMENT RISK ASSESSMENT							

Hazard Identification and evaluation

No	Hazards	Associated risks	Current Control/ Mitigation Measures	Risk Evaluation (post measures)			Additional control needed?
				Probability	Severity	Risk	Action No
1	Contact between subjects and staff increasing the risk of transmission of COVID19 : <u>Welcome & registration</u>	Transmission of the virus leading to ill health or potential death	<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/awaiting test results (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 in place to ensure compliance in addition to verbal reminders if necessary from staff. 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 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 and LFT test kits for first 200 subjects All staff to have received full training on working in testing areas and compliance before commencing work on testing Layout of rooms are set out in accordance with the guidance and distancing required. Correct disposal of waste Any incidents to be reported to the Trust and DfE as per requirements QA Checklist to be undertaken prior to any testing being undertaken Quality Assurance to be conducted daily by the Test Leader Quality Assurance to be undertaken twice weekly minimum by the Trust Both CV19 Operational Risk Assessment to be used alongside the testing Risk Assessment – all staff to have read and understood both Ensure all pupils who are being serial tested are kept separate until test result received and correct 	2	3	6	

2	Contact between subject and sampler increasing the transmission of COVID19: Sample taking	Transmission of the virus leading to ill health or potential death	<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/awaiting test results (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 in place to ensure compliance in addition to verbal reminders if necessary from staff. 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 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 and LFT test kits for first 200 subjects All staff to have received full training on working in testing areas and compliance before commencing work on testing Layout of rooms are set out in accordance with the guidance and distancing required. Correct disposal of waste Any incidents to be reported to the Trust and DfE as per requirements QA Checklist to be undertaken prior to any testing being undertaken Quality Assurance to be conducted daily by the Test Leader Quality Assurance to be undertaken twice weekly minimum by the Trust Both CV19 Operational Risk Assessment to be used alongside the testing Risk Assessment – all staff to have read and understood both 	2	3	6	
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3	Contact between sample and test centre runner increasing the transmission of COVID19: Sample transport	Transmission of the virus leading to ill health or potential death	<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/awaiting test results (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 in place to ensure compliance in addition to verbal reminders if necessary from staff. 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 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 and LFT test kits for first 200 subjects All staff to have received full training on working in testing areas and compliance before commencing work on testing Layout of rooms are set out in accordance with the guidance and distancing required. Correct disposal of waste Any incidents to be reported to the Trust and DfE as per requirements QA Checklist to be undertaken prior to any testing being undertaken Quality Assurance to be conducted daily by the Test Leader Quality Assurance to be undertaken twice weekly minimum by the Trust Both CV19 Operational Risk Assessment to be used alongside the testing Risk Assessment – all staff to have read and understood both 	2	3	6	
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4	<p>Contact between samples and sample testers increasing the transmission of COVID19: <u>Sample processing & analysis.</u></p>	<p>Transmission of the virus leading to ill health or potential death</p>	<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/awaiting test results (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 in place to ensure compliance in addition to verbal reminders if necessary from staff. 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 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 and LFT test kits for first 200 subjects All staff to have received full training on working in testing areas and compliance before commencing work on testing Layout of rooms are set out in accordance with the guidance and distancing required. Correct disposal of waste Any incidents to be reported to the Trust and DfE as per requirements QA Checklist to be undertaken prior to any testing being undertaken Quality Assurance to be conducted daily by the Test Leader Quality Assurance to be undertaken twice weekly minimum by the Trust Both CV19 Operational Risk Assessment to be used alongside the testing Risk Assessment – all staff to have read and understood both 	2	3	6	
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5	<p>Contact between samples and sample testers increasing the transmission of COVID19: Sample disposal and waste disposal</p>	<p>Transmission of the virus leading to ill health or potential death</p>	<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/awaiting test results (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 in place to ensure compliance in addition to verbal reminders if necessary from staff. 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 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 and LFT test kits for first 200 subjects All staff to have received full training on working in testing areas and compliance before commencing work on testing Layout of rooms are set out in accordance with the guidance and distancing required. Correct disposal of waste Any incidents to be reported to the Trust and DfE as per requirements QA Checklist to be undertaken prior to any testing being undertaken Quality Assurance to be conducted daily by the Test Leader Quality Assurance to be undertaken twice weekly minimum by the Trust Both CV19 Operational Risk Assessment to be used alongside the testing Risk Assessment – all staff to have read and understood both 	2	3	6	
6	<p>Incorrect result communication</p>	<p>Wrong samples or miscoding of results</p>	<ul style="list-style-type: none"> 3 identical barcodes are provided to staff/child 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 swabbing bay Barcodes are checked for congruence at the processing station 1 and applied to Lateral Flow Device at this station 	3	3	9	

7	Damaged barcode, lost LFD, failed scan of barcode	Orphaned record on registration portal & No result communicated to individual	<ul style="list-style-type: none"> Rule based recall of subjects who have not received a result within 1 hr of registration Subjects are called for a retest 	2	3	6	
8	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)	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 developmental toxicity, carcinogenicity, and medical conditions aggravated by exposure.	<ul style="list-style-type: none"> PPE: nitrile gloves which meet the Regulation (EU) 2016/425 to be used at all time. Full face shields which are tested and approved under appropriate government standards to be worn at all times when handling the extraction solution. PPE Apron 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 academy'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. 	3	3	9	
9	Occupational illness or injury		<ul style="list-style-type: none"> Full training to be undertaken by all staff involved in testing All staff have access to necessary risk assessments related to the testing framework and other related processes required Insurance provision on place Accident reporting and monitoring in place – with near miss recordings and evaluation undertaken Quality assurance process in place to reduce risks and improve controls Clear signage in place 	2	3	6	
10	Manual handling		<ul style="list-style-type: none"> Training provided as required on manual handling procedures Support from site staff for transporting equipment 	2	3	6	
11	Unauthorised access	<p>Transmission of the virus leading to ill health or potential death</p> <p>Disruption to testing processes leading to incorrect tests being recorded and undertaken</p> <p>Data protection issues</p>	<ul style="list-style-type: none"> Anyone being educated, visiting or working on site informed of restricted area Record kept of everyone allowed in the testing area and when (rota to be kept) Clear Signage Lead for testing process to take necessary action as required for unauthorized access with individuals 	3	3	9	
12	Uneven surfaces (floor protection in the Testing and Welfare areas)	Slips, trips, falls, injury of children and staff	<ul style="list-style-type: none"> Site maintenance check on all flooring Robust cleaning regime in place 	2	3	6	

13	Stairs to / from sample processing / registration area and welfare space	Slips, trips, falls, injury of children and staff.	<ul style="list-style-type: none"> • Full training to be undertaken by all staff involved in testing • All staff have access to necessary risk assessments related to the testing framework and other related processes required • Insurance provision on place • Accident reporting and monitoring in place – with near miss recordings and evaluation undertaken • Quality assurance process in place to reduce risks and improve controls • Clear signage in place 	2	3	6	
14	Inclement weather	Slips, falls, injury of children and staff. Contamination of test site	<ul style="list-style-type: none"> • Slip mats in place on the inside to any direct outside doors • Gritting in place to the test areas for access and exit • Slip Signage • Ensure there is no contamination of any of the testing area from wet clothing • Cleaning of wet areas 	2	3	6	
15	Electrical safety / plant & equipment maintenance Defective electrical equipment	Trips, Injury of children and staff, fire, loss of data, unable to record data	<ul style="list-style-type: none"> • All equipment to be PAT Tested annually • Cable safety adhered to to avoid trip hazards • IT equipment to be checked for compatibility and safety • Back up recording procedure in place 	2	3	6	
16	Use of shared equipment	Contamination Cross Infection	<ul style="list-style-type: none"> • Cleaning of equipment with appropriate chemicals wipes to reduce contamination • Allocate equipment to individuals to avoid share use • No personal belongings or equipment to be taken into the testing room 	1	2	2	

Diverse Academies Additional Hazards and Risks

No	Hazards	Associated risks	Current Control/ Mitigation Measures	Risk Evaluation (post measures)			Additional control needed?
				Probability	Severity	Risk	Action No
1	Insufficient Staffing to conduct testing	Unable to conduct testing	<ul style="list-style-type: none"> Recruit and train as many staff as possible and allocate to appropriate roles Use staff on a rota basis to ensure that there is sufficient hands on experience of all recruited to cover for each other Support from HR Advisors on recruitment and role allocation Review cover from other academies where appropriate Register roles appropriately with DfE to enable dual roles if required 	2	3	6	
2	Staff absence resulting in trained and sufficient testing staff unavailable	Unable to conduct testing	<ul style="list-style-type: none"> Recruit and train as many staff as possible and allocate to appropriate roles Use staff on a rota basis to ensure that there is sufficient hands on experience of all recruited to cover for each other Support from HR Advisors on recruitment and role allocation Review cover from other academies where appropriate Register roles appropriately with DfE to enable dual roles if required 	2	3	6	
3	Lack of space on the site to enable team to conduct testing in the appropriate manner	Unable to conduct testing safely	<ul style="list-style-type: none"> Consider all options for conducting testing with Estates and LT NHS/PHE/DfE to be contacted if no suitable space available 	2	3	6	
4	Lack of quality assurance and control measures being carried out during testing to ensure compliance and safety	Testing not carried out adequately and safely Contamination Infection Incorrect results and data	<ul style="list-style-type: none"> Clear role indicators for quality control to be in place and followed meticulously Central Trust checks on quality control compliance conducted by CQR Team Data quality assurance to be put in place by central data team Team leader to ensure quality checks are recorded and carried out correctly and reporting back to Leadership at least weekly Any issues to be reported to DfE as instructed in training sessions – monitored and evaluated 	2	3	6	

5	Safeguarding of children and staff is regulated and monitored e.g. Wellbeing, illness, anxiety, Criminal checks etc.	Anxiety of children and staff Data protection issues Lack of staff conviction awareness Sickness absence Stress related illnesses	<ul style="list-style-type: none"> Wellbeing champions in academies, supported by Trust HR Lead Training of staff to support and deal with anxieties around testing Barred list checks in place for volunteers or anyone not already DBS checked through the Trust SCR update with any new volunteers/staff undertaking testing roles and training records. Safeguarding lead for the Trust working with Academies to ensure support is in place and quality assured. Any incidents reported through My Concern and, if relevant, to the DfE through the testing area. Tests being undertaken for special needs and other children with disabilities to be risk assessed appropriately according to individual needs. Support for staff and children feeling unwell or anxious in the testing area, including equipment for physical illness (e.g. sickness bowls, first aid box) 	2	3	6	
6	Risk assessments for testing not fully in place and being adhered to	Criminal Liability Civil Liability Insurance claims Controls not effective	<ul style="list-style-type: none"> Insurance cover checked and in place for all testing activities Staff are fully briefed on risk assessments and requirements expected of them in their roles Quality assurance processes in place for ensuring compliance and adherence to regulations by Trust and Team Leaders locally 	3	4	12	
7	Data handling and protection	GDPR Breach of sensitive and personal data Consent issues Privacy notices not adequate	<ul style="list-style-type: none"> Where no consent received then self isolation when in contact with positive case is the action to be undertaken Consent to be monitored, chased and recorded correctly Training to be undertaken by all staff involved in recording test processes ICT equipment to have correct filters and virus controls in place Privacy notices to be in place, communicated and accessible Thorough testing of data and ICT systems prior to undertaking any tests to ensure accuracy Retention of data to be maintained as per the testing requirements Issues reported to Trust DPO as required 	2	1	2	

Control Improvements

Academies to add in actions to this area that need to be undertaken locally to meet controls and any actions identified to be added for ongoing monitoring

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 Testing Coordinator		
2	Toolbox talks to be delivered to all workers on a regular basis including slips trips falls and complacency	Covid Testing Coordinator		

Additional Notes

Risk Evaluation

		Consequence of event occurring (Severity)				
		Negligible	Minor	Moderate	Major	Critical
Likelihood of event occurring (Probability)	Almost Certain	Tolerable 5	Substantial 10	Intolerable 15	Intolerable 20	Intolerable 25
	Likely	Tolerable 4	Substantial 8	Intolerable 12	Intolerable 16	Intolerable 20
	Possible	Trivial 3	Tolerable 6	Substantial 9	Intolerable 12	Intolerable 15
	Unlikely	Trivial 2	Tolerable 4	Tolerable 6	Substantial 8	Substantial 10
	Rare	Trivial 1	Trivial 2	Trivial 3	Tolerable 4	Tolerable 5

Likelihood

- Rare**, will probably never happen/recur
- Unlikely**, do not expect it to happen, but is possible
- Possible**, Might happen
- Likely**, will probably happen
- Almost Certain**, will undoubtedly happen

Severity

- Negligible
- Minor
- Moderate
- Major
- Critical

Risk control strategies

- Intolerable** – stop activity, take immediate action to reduce the risk
- Substantial** - Take action within an agreed period
- Tolerable** – monitor the situation
- Trivial** – No action required

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.

Persons involved in assessment

Signature of Lead Assessor

Date

