

TOWER COLLEGE

Coronavirus (COVID-19): Asymptomatic Testing Policy for September 7th, 2021

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Statement of intent

In order to safeguard the health of our school community and to keep as many staff and pupils in attendance at school as possible, Tower College will be implementing the use of rapid-result testing. This will help us to identify asymptomatic cases, which make up a third of all cases, thereby limiting the spread of the virus.

Rapid testing will be introduced alongside our existing infection prevention and control measures, e.g. social distancing. All staff who are working on site will be encouraged to take part in twice-weekly home testing. All pupils will be provided with the opportunity to take part in twice-weekly home testing. Pupils who are unable or unwilling to be tested at home can be tested on site, with parental consent provided where necessary.

This policy has been developed to ensure that all staff involved in the rapid testing process undertake their duties in a professional manner at all times, understand how to conduct tests safely, and treat those who are being tested with sensitivity and respect.

1. Legal framework

This policy has due regard to the relevant guidance, including, but not limited to, the following:

- Department for Environment, Food & Rural Affairs (2021) 'Coronavirus (COVID-19): disposing of waste'
- DfE (2021) 'Coronavirus (COVID-19) asymptomatic testing in schools and colleges'
- DfE (2021) 'Schools coronavirus (COVID-19) operational guidance'
- NHS (2021) 'How to Guide: Rapid Testing on-site (ATS) in Secondary Schools and Colleges'
- NHS (2021) 'How to Guide: Rapid Testing of Education Staff and Secondary Age Pupils at Home (Self-Test)'

This policy operates in conjunction with the following documents:

- Coronavirus (COVID-19): Risk Assessment for Schools
- Administering Medication Policy
- Child Protection and Safeguarding Policy

2. Roles and responsibilities

The Principal is responsible for:

- Communicating the purpose of the testing to develop an understanding of the service amongst staff, pupils and parents.
- Communicating with staff and pupils via Parent-Mail or email to inform them of the testing activities taking place, including test result guidance, a privacy notice, and a consent form to be completed and returned for on-site testing.
- Directing the relevant individuals within the school to lead a proactive social media effort to provide information for community stakeholders about the testing process, its procedures and its importance.
- Ensuring that legislation and official guidance is adhered to at all times during the process of conducting tests on site.
- Ensuring that a suitable area of the school is designated as a testing site that meets all the necessary requirements.
- Informing the relevant staff and volunteers to watch the training videos provided by NHS Test and Trace on the [document sharing platform](#) to facilitate of rapid testing.
- Raising any questions about the school's responsibilities in relation to rapid testing with the DfE via the DfE coronavirus helpline or by emailing RapidTesting.SCHOOLS@education.gov.uk.
- Appointing members of staff, provided that it is in line with their agreed terms and conditions of employment, to roles required to deliver the testing programme: quality lead/team leader, test assistant, processor, COVID-19 coordinator, registration assistant, results recorder, cleaner.
- Applying for reasonable costs incurred in the process of securing additional workforce to be reimbursed by NHS Test and Trace.
- Handling any complaints about the conducting of rapid tests in line with the relevant school policy, e.g. Complaints Procedures Policy or Grievance Policy.

Staff and volunteers on the designated workforce are responsible for:

- Undergoing the relevant training necessary for the effective delivery of their roles and the safe and correct conduct of testing procedures.
- Undertaking tests respectfully and sensitively, reassuring those being tested where necessary.

The quality lead/team leader is responsible for:

- The overall on-site operations at the test site, including day-to-day workforce management.
- Ensuring quality assurance, managing incidents, and risk mitigation across the testing service.

The test assistant is responsible for:

- Providing guidance and supervision to staff and pupils receiving tests on swabbing procedures as requested.
- Collecting completed swabs and passing them to the processing operatives.
- Ensuring the cleaning of swabbing desks.

The processor is responsible for:

- Preparing test samples for analysis.
- Processing tests and interpreting the results.
- Providing results to the results recorder.
- Preparing test samples for analysis.
- Ensuring the cleaning of processing desks.

The COVID-19 coordinator is responsible for:

- Signing off and scheduling testing activities.
- Ensuring communications and consents are actioned.
- Managing positive cases in line with school guidelines.

The results recorder is responsible for:

- Collating results from processing operatives and uploading to the NHS Test and Trace service.

The registration assistant is responsible for:

- Ensuring subjects have registered and distributing kits on arrival.
- Ensuring the orderly entry of subjects onto the testing site.

The cleaner is responsible for:

- Cleaning the testing bays.
- Ensuring waste is correctly disposed of.

The SENCO is responsible for:

- Liaising with the parents of pupils with SEND to discuss additional measures that will be needed to administer tests safely.
- Checking that appropriate measures are in place to support pupils with SEND during the testing process.

The DPO is responsible for:

- Recording where consent has been received for individuals partaking in the testing programme.
- Ensuring testing only takes place on individuals for whom there exists a record of consent.

Parents of pupils aged 16 and under are responsible for deciding whether to provide consent for their child to partake in rapid testing.

3. Consent

Participation in the rapid testing programme will be voluntary and tests will only be conducted on individuals for whom consent has been given. Consent forms will ensure that consent is freely given and that all relevant information about the testing programme is provided.

A privacy notice which explains how pupil's personal data will be used will be provided when requesting consent.

Pupils testing at home will be provided with key information and a privacy notice to ensure they understand the scheme, including how their data will be used – consent to undertake a home test will be considered to have been provided upon administration at home. Where individuals use a home testing kit, they will be required to provide their consent for the school to report the results. The headteacher will decide when testing will not be possible for some pupils, such as those identified as vulnerable, for reasons of feasibility or consent.

Participants' consent will include providing their confirmatory polymerase chain reaction (PCR) test results to the school, where applicable.

For pupils aged 11 to 15, the school will need to obtain consent from pupils' parents. Pupils aged 16 and over can provide their own consent if the school is satisfied that they are able to consent to their own medical treatment without a parent or guardian present.

The DPO will ensure that consent is secured and tracked for the purposes of participation, and recorded on the school's COVID-19 Test Register.

The DPO will keep a record of individuals for whom consent has and has not been provided. Tests will only be conducted on individuals for whom the DPO can confirm consent has been given.

4. Data security and handling

The principal will ensure a privacy notice compliant with data protection guidance is shared with staff, parents and pupils in regards to the rapid testing process. The school will encourage

all testing participants to make a copy of the instructions for test kit use. The school will ensure all testing participants understand their data protection rights when they record their test results in the test kit log.

The privacy notice will be shared alongside the initial correspondence regarding the rapid testing process to ensure that decisions about consent are made with a full understanding of how personal data will be processed. A copy of the privacy notice will be provided on the school's website and in a common area of the school. The language used in any material intended to explain what data is being collected, why it is being collected, and how it will be used, will be clear and easily understood.

The school will raise any concerns about data security and handling by contacting the DPO for the DfE via dp.enquiries@education.gov.uk by marking the subject as "COVID Testing in Schools/Colleges – Data Protection Issues". The DPO will ensure that data obtained during the rapid-testing process is handled in line with legislation and will be deleted by the school after it has been retained for a minimum of 14 days.

The school will rely on its safeguarding powers under Section 3 of the Non-Maintained Schools Regulation 1999 as the lawful basis for the processing of data as part of the testing process.

5. Testing site

The testing site will be established in an area that meets the following key layout requirements:

- Flooring is non-porous and easy to clean
- The area is well lit and has good airflow with no recirculation of air
- The ambient temperature is between 15°C and 30°C for lateral flow devices (LFDs) to operate
- LFDs are stored between 2°C and 30°C.
- A registration desk is at the first point where the test subject would enter the test site
- A one-way direction of travel for test subjects is established – if this is not possible, enough room will be provided to allow test subjects to exit the room whilst maintaining social distance
- Test subjects' chairs in the swabbing bay are a minimum of two metres apart
- Each swabbing desk has a processing desk close by (no more than two metres away) and a recording desk will be located close by
- There is a clear division between the swabbing and processing area to signal that test subjects must not enter the processing area

The quality lead/team leader will oversee the on-site operations at the test site, ensuring that all staff understand their responsibilities at the test site, overseeing procedures and providing guidance where necessary.

The headteacher ensures that staff, visitors and pupils are made aware of the testing site's location and the rules governing its use, with visual aids used where appropriate. The testing site and guidance will include reasonable provisions for individuals with medical conditions and pupils with SEND. Testing devices and PPE will be stored securely at a temperature between 2°C and 30°C.

The site manager will ensure that the testing site is cleaned daily if in use.

6. Conducting tests on site

The testing programme will be managed in line with the school's existing system of controls, including:

- Maintaining social distancing where possible.
- Promoting good hand and respiratory hygiene.
- Keeping occupied spaces well ventilated.

Rapid-result testing is for asymptomatic pupils and members of staff only. Testing will not be conducted on symptomatic individuals as the test may give a false negative result, and instead symptomatic individuals will be required to self-isolate and seek a PCR test.

The Principal will ensure that only staff who have passed the knowledge assessments at the end of online training provided by NHS Test and Trace are part of the testing workforce, e.g. Covid-19 Coordinator.

The school will retain a small asymptomatic testing site (ATS) for pupils who are unable or unwilling to conduct self-tests at home.

Testing will not be conducted on individuals who have had a positive PCR test result within the prior 90 days as the test may give a false positive result.

Most staff and pupils aged 12 and above will self-administer rapid tests with supervision from trained personnel. In some cases, trained personnel will administer a test on an individual, e.g. where an individual's needs mean that they would not be able to self-test effectively.

The appropriate PPE, including gloves, aprons, masks and eye protection, will be provided by the government and will be worn by staff at all times where it is necessary, in line with NHS Test and Trace guidance. PPE will be worn, removed and disposed of in line with NHS Test and Trace guidance and online training provided. PPE will be replaced between test sessions, e.g. at the end of the morning session before lunch. Personnel involved in sample processing will change gloves after handling each sample.

Infection control measures will remain in place at all times on the test site in line with the Infection Control Policy. Hand washing stations will be provided to enable staff and pupils to wash their hands before entering and upon exiting the test site.

Staff and pupils aged 12 and over will complete a throat and nasal swab test supervised by trained personnel. Where a test cannot be self-administered, administered swabbing will be conducted by a trained member of staff. Swabs will be removed gently and placed in a tube securely for testing, in line with official procedures. Pupils will be supported during the testing process and reassured where they have any concerns; testing will not take place until the pupil is comfortable.

7. Conducting tests at home

Following the first three on-site rapid-result tests, pupils will be offered two rapid-result self-testing kits per week to complete at home.

The Covid-19 coordinator will oversee the necessary administrative requirements, e.g. reporting incidents and reordering tests when required, with support provided by the registration assistant.

A collection or storage point will be established for test kits that meets the following requirements:

- It is able to be secured to prevent unauthorised access
- It is inside and with a temperature between 2°C and 30°C
- It contains a desk or space for pupils to sign for the test kits they are collecting
- It allows enough space for social distancing

Pupils will be asked to complete the tests three to five days apart, to be conducted in the morning before attending school where possible.

The school will ensure pupils understand that, where they consent to taking part in asymptomatic testing, they are required to report their test results to NHS Test and Trace as soon as the test is completed, either online or via telephone as per the instructions provided with the test kit.

Pupils will be informed of the importance of sharing the result of each test, whether positive, negative or void, with the school to help with contact tracing.

Pupils and parents will be informed that:

- Pupils aged 11 will require an adult to conduct the test for them.
- Pupils aged 12 to 17 will be permitted to conduct their own tests at home under supervision from an adult.

Where pupils are unable or unwilling to conduct tests at home, the school will invite them to participate in twice weekly testing on site. The school will ensure all pupils taking part in the asymptomatic self-tests are provided with the NHS's most up-to-date 'Instructions for Use'.

For non-clinical issues that occur at home, e.g. part of the test kit is damaged or missing, pupils will be advised to report it by phoning 119. For clinical issues which led, or had the potential to lead, to harm, pupils will be advised to report it on <https://coronavirus-yellowcard.mhra.gov.uk/>.

The school will keep a test kit log as a 'living document' to record test kit stock levels and who has taken test kits.

8. Test results

The principal will ensure that all test results – whether positive, void, or negative – are registered and recorded safely on the online NHS Test and Trace system.

[Please note this register is for internal purposes and it is a separate requirement to the need to record results on the online NHS Test and Trace system.] The principal will ensure a test register is established to allow the school to record results by individuals. The following information will be included on the register:

- The name of the individual being tested
- Confirmation that the individual has provided consent
- A unique identifier for the individual if needed, e.g. their date of birth
- The barcode attached to the LFD test they have been provided
- The result of the test

The test register will be kept for a minimum of 14 days and securely destroyed within one month of the testing programme ending.

The details of an individual who tests positive will be recorded securely to protect their privacy, in line with the Data Protection Policy. Positive results will be handled in line with the school's Infection Control Policy.

Staff and pupils who test positive following an LFD test will be required to self-isolate immediately. They will need to access a PCR test within two days of the LFD test – if they are unable to do so, or they do and the PCR test is positive, they must self-isolate for 10 days. If the PCR test is negative, they can stop self-isolating and return to school.

If a test is void, the test will be retaken – if both tests are void, the pupil will be asked to book a PCR test

Staff will not be required to provide evidence of a negative test result to attend the school site. Pupils who have to self-isolate following the result of a test will be provided with learning resources in line with the school's Pupil Remote Education Policy. Close contacts of an individual who has tested positive will be instructed to self-isolate.

9. Disposing of waste

The site manager will ensure all waste is disposed of in line with the Department for Environment, Food & Rural Affairs guidance 'Coronavirus (COVID-19): disposing of waste'.

The site manager will discuss arrangements for the management of LFD test kit wastes with the school's waste management contractor.

LFD wastes are not considered to be healthcare waste and the school will dispose of it alongside other waste, e.g. black bag waste. The school will separate LFD waste from any recyclable packaging or other material. Outer packaging provided with the LFD test kits will be recycled or disposed of through the school's existing waste streams.

Once an LFD test kit has been used, swabs, cartridges and devices will be placed in the small waste bag provided with the kit and disposed of in black bag waste bins. Disposable equipment, e.g. face coverings, gloves and aprons, will be disposed of in black bag waste bins. A secure area will be established to store waste bin bags to enable it to be removed by our waste contractors.

10. Safeguarding

The school adopts rigorous safeguarding procedures in accordance with the Child Protection and Safeguarding Policy, and will apply these requirements to the testing process.

Where aspects of conducting tests are classified as regulated activity, the school will ensure that all adults involved have undergone an enhanced DBS check (which includes barred list information) enabling them to work with children. In instances where an enhanced DBS check is required but has not yet been completed, the relevant individual must be supervised at all times.

All members of staff are instructed to report any concerns about the safety and welfare of children with regards to rapid testing to the DSL or a deputy in accordance with the school's Whistleblowing Policy. Any concerns about the safeguarding of children will be dealt with in accordance with the Child Protection and Safeguarding Policy and the Allegations of Abuse Against Staff Policy.

11. Monitoring and review

The principal will review this policy regularly in line with new and updated guidance from the government. All members of staff assigned a role as part of the testing process are required to familiarise themselves with this policy as part of their induction programme.

All changes to this policy will be communicated with the relevant stakeholders.