

Wales High School

Coronavirus (COVID-19): Testing Policy for Secondary Schools

Contents:

[Statement of intent](#)

1. [Legal framework](#)
2. [Roles and responsibilities](#)
3. [Consent](#)
4. [Data security and handling](#)
5. [Testing site](#)
6. [Conducting tests on site](#)
7. [Conducting tests at home](#)
8. [Test results](#)
9. [Disposing of waste](#)
10. [Safeguarding](#)
11. [Monitoring and review](#)

Statement of Intent

In order to safeguard the health of our school community and to keep as many staff and students in attendance at school as possible, Wales High School 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. All staff who are working on site will be encouraged to take part in twice weekly home testing. All students will be asked, with parental consent where necessary, to take three on-site lateral flow device (LFD) tests three-to-five days apart upon their initial return to school. Students will then be offered two self-tests to take at home each week thereafter.

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.

Signed by:

_____ Headteacher Date: _____

_____ Chair of governors Date: _____

1. **Legal Framework**

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

- 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 Students at Home (Self-Test)'

1.2 This policy operates in conjunction with the following documents:

- Coronavirus (COVID-19): Risk Assessment
- Safeguarding including Child Protection

2. **Roles and Responsibilities**

2.1 The Covid Lead is responsible for:

- Communicating the purpose of the testing to develop an understanding of the service amongst staff, students and parents.
- Communicating with staff and students 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.
- 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.
- Securing volunteers (e.g. governors) or hiring staff (e.g. agency workers) to work in the roles required to deliver the testing programme where necessary.
- 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

2.2 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.

2.3 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.

2.4 The test assistant is responsible for:

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

2.5 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.

2.6 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.

2.7 The results recorder is responsible for:

- Collating results from processing operatives and uploading to digital solution.
- 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.

2.8 The cleaner is responsible for:

- Cleaning the testing bays.
- Ensuring waste is correctly disposed of, including working with clinical waste providers where necessary to dispose of clinical waste.

2.9 The SENCO is responsible for:

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

2.10 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 students aged under 16 are responsible for deciding whether to provide consent for their child to partake in rapid testing.

3. Consent

- 3.1 Participation in the rapid testing programme will be voluntary and tests will only be conducted on individuals for whom consent has been given.
- 3.2 Consent to undertake a home test will be considered de facto upon administration at home.
- 3.3 Where individuals use a home LFD testing kit, they will be required to provide their consent for the school to report the results.
- 3.4 Consent forms will ensure that consent is freely given and that all relevant information about the testing programme is provided.
- 3.5 The headteacher will decide when testing will not be possible for some students, such as those identified as vulnerable, for reasons of feasibility or consent.
- 3.6 Participants' consent will include providing their confirmatory test results to the school, where necessary.
- 3.7 For students aged 11 to 15, the school will need to obtain consent from students' parents. Students 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.
- 3.8 The DPO will ensure that consent is secured and tracked for the purposes of participation.
- 3.9 The DPO will keep a record of individuals whom consent has and has not been provided for.
- 3.10 Tests will only be conducted on individuals for whom the DPO can confirm consent has been given.

4. Data Security and Handling

- 4.1 The Covid Lead will ensure a privacy notice compliant with data protection guidance is shared with staff, parents and students in regards to the rapid testing process.
- 4.2 The school will encourage all testing participants to make a copy of the instructions for test kit use.
- 4.3 The school will ensure all testing participants understand their data protection rights when they record their test results in the test kit log.
- 4.4 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.
- 4.5 A copy of the privacy notice will be provided on the school's website.

- 4.6 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.
- 4.7 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”.
- 4.8 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 14 days.
- 4.9 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

- 5.1 The testing site will be established in an area that meets the following key layout requirements:
- Flooring is non-porous
 - The area is well lit and has good airflow
 - The ambient temperature is between 15°C and 30°C.
- 5.2 A registration desk is at the first point where the test subject would enter the test site
- 5.3 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
- 5.4 Test subjects’ chairs in the swabbing bay are a minimum of two metres apart
- 5.5 Each swabbing desk has a processing desk close by (no more than two metre away) and a recording desk will be located close by
- 5.6 There is a demarcated area to signal that test subjects must not enter the processing area
- 5.7 There is a demarcated area to establish a clear division between swabbing and processing area
- 5.8 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.
- 5.9 The Covid Lead ensures that staff, visitors and students are made aware of the testing site’s location and the rules governing its use, with visual aids used where appropriate.
- 5.10 The testing site and guidance will include reasonable provisions for individuals with medical conditions and students with SEND.
- 5.11 Testing devices and PPE will be stored securely at a temperature between 2°C and 30°C.
- 5.12 The Premises & Facilities Manager will ensure that the testing site is cleaned daily.

6. Conducting Tests on Site

- 6.1 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.
- 6.2 Rapid-result testing is for asymptomatic students 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.
- 6.3 All students will be offered three LFD tests on-site, three-to-five days apart, upon their return to school from 8 March. Most tests thereafter will be self-administered by students at home.
- 6.4 The school will retain a small asymptomatic testing site (ATS), after the first three tests upon the return to school have been carried out, for those students who cannot or do not want to conduct self-tests at home.
- 6.5 Testing will not be conducted on individuals who have had a positive coronavirus PCR test result within the prior 90 days as the test may give a false positive result.
- 6.6 Most staff and students aged 12 and above will self-administer rapid tests with supervision from trained personnel.
- 6.7 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.
- 6.8 PPE will be worn, removed and disposed of in line with NHS Test and Trace guidance and online training provided.
- 6.9 PPE will be replaced between test sessions, e.g. at the end of the morning session before lunch.
- 6.10 Personnel involved in sample processing will change gloves after handling each sample.
- 6.11 Infection control measures will remain in place at all times on the test site in line with the Infection Control Policy.
- 6.12 Hand washing stations will be provided to enable staff and students to wash their hands before entering and upon exiting the test site.
- 6.13 Staff and students aged 12 and over will complete a throat and nasal swab test supervised by trained personnel.
- 6.14 Swabs will be removed gently and placed in a tube securely for testing, in line with official procedures.
- 6.15 Students will be supported during the testing process and reassured where they have any concerns; testing will not take place until the student is comfortable.

7. Conducting Tests at Home

- 7.1 Following the first three on-site rapid-result tests, students will be offered two rapid-result self testing kits per week to complete at home.
- 7.2 The school will ensure students understand that, where they consent to taking part in asymptomatic testing, they are required to upload any test results to the NHS Test and Trace website, or call NHS Test and Trace with their results.
- 7.3 Students and parents will be informed that:
- Students aged 11 will require an adult to conduct their test for them.
 - Students aged 12 to 15 will be permitted to conduct their own tests at home under supervision from an adult.
 - Students aged 16 and over will be permitted to conduct their own tests without supervision from an adult.
- 7.4 Where students cannot or will not conduct their tests from home, the school will invite them to get tested at the ATS.
- 7.5 The school will ensure all students taking part in the asymptomatic self-tests are provided with the NHS's most up-to-date 'Instructions for Use'.
- 7.6 The school will keep a test kit log as a 'living document' to record test kit stock levels.

8. Test Results

- 8.1 The Covid Lead will ensure that all tests results – whether positive or negative – are registered and recorded safely on the online NHS Test and Trace system.
- 8.2 The Covid Lead 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
- 8.3 The test register will be securely destroyed within one month of the testing programme ending.
- 8.4 The details of an individual who tests positive will be recorded securely to protect their privacy, in line with the Data Protection Policy.
- 8.5 Positive results will be handled in line with the school's Positive Response Protocol.
- 8.6 Staff and students who test positive on-site will be required to self-isolate immediately for 10 days – they will not be required to take a PCR test to confirm the result.
- 8.7 Staff will not be required to provide evidence of a negative test result to attend the school site.

8.9 Students who have to self-isolate following the result of a test will be provided with learning resources in line with the school's remote learning statement.

8.10 Close contacts of an individual who has tested positive will be instructed to self-isolate.

9. Disposing of Waste

9.1 The Premises Manager will ensure all waste is disposed of in line with the NHS guidance 'COVID-19 National Testing Programme: How to Guide – Rapid Testing in Schools and Colleges'.

9.2 The school will not consider LFD waste as healthcare waste, and will dispose of it alongside other waste, e.g. black bag waste.

9.3 The school will separate LFD waste from any recyclable packaging or other material. Outer packaging provided with the LFD test kits will be recycled.

9.4 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.

9.5 Disposable equipment, e.g. face coverings, gloves and aprons, will be disposed of in black bag waste bins.

9.6 The site manager will inform the school's waste contractor that waste from testing is not classified as "healthcare waste" or "clinical waste" and confirm that they are able to collect it.

9.7 General waste will be disposed of via the school's usual general waste route.

10. Safeguarding

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

10.2 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.

10.3 In instances where an enhanced DBS check is required but has not yet been completed, the relevant individual must be supervised at all times.

10.4 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.

10.5 Any concerns about the safeguarding of children will be dealt with in accordance with the Safeguarding including Child Protection Policy and the Allegations of Abuse Against Staff Policy.

11. Monitoring and Review

11.1 The Covid Lead will review this policy regularly in line with new and updated guidance from the government.

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