Geneblitz

White Paper

COVID-19 Testing for Staff: Guidance for Employers

Contents

Introduction

Running a business during a global pandemic poses multiple challenges and for responsible employers staff wellbeing is on top of the list. Employers are of course keen to restart their business' activities, but do not want to compromise the safety of their employees.

That is why an internal COVID-19 testing programme could be something business owners might wish to consider. Testing of your staff will be entirely voluntary, but, if done correctly, can provide a much-needed confidence to both customers and employees.

The following guidance covers the different elements of running an internal screening programme for asymptomatic employees and sets out the best practices to follow. It applies to England only and you can find more details on the [government's website](#).

Available tests and what their results show

Currently, there are two types of COVID-19 tests available: virus tests and antibody tests. Employers and employees must follow COVID-19 safety measures, regardless of the result of either test.

- **Virus testing**

A virus test will show whether somebody currently has the coronavirus. If a staff member tests positive, they should immediately self-isolate for 10 days from the point of developing symptoms. If they are asymptomatic, then they should self-isolate for 10 days from the date of their test. They are also advised to share their recent contacts with NHS Test and Trace.

Testing negative for the virus means the person is at low risk of having COVID-19 at that moment. However, this test does not mean that they will not catch the virus in the future. If someone develops symptoms after testing negative, they should self-isolate and be tested again.

Symptomatic staff should not enter your premises and must go directly to NHS Test and Trace. Under these circumstances, a virus test should be done as soon as possible. You can also refer your symptomatic employees for NHS virus testing through the [Employer Referral Portal](#).

If you wish to test asymptomatic staff repeatedly, then be aware that at present there is no specific number of times someone should be tested within a given timeframe.

However, we would recommend tests every four days. For the most part this is impractical and once per week may have to suffice.

- **Awareness of false results**

There are comments circulating regarding false negatives. The laboratory part of the test is highly reliable (though we always recommend you choose an accredited lab, such as ourselves) and is unlikely to miss the virus if it is in the sample.

Any false negative issue is likely to arise from self-sampling where there has not been enough contact with the back of the throat.

In the early days the "belt and braces" approach was to sample the throat and then the nose, neither of which are very pleasant. We always prefer clients to attend our premises (as a walk-in if required) so that one of our experienced staff can take the sample. If off-site, we will try to send one of our trained sample collectors to your premises. In this way we can minimise the possibility of poor samples.

- **Antibody testing**

An antibody test can tell whether someone has had COVID-19 in the past. It is worth noting that a positive antibody test does not indicate immunity to COVID-19 or how long it will last. There have been instances of reinfection. Safety measures in the workplace should be followed regardless of the antibody test result.

At the moment, Public Health England does not recommend antibody testing and we agree. This should remain in the domain of public health research until we understand the virus more.

The testing process

Making an informed decision

There are several matters you should consider before setting up a testing programme for your workforce.

- Who are you going to test – and how often
- Which test are you going to use
- Where are you going to carry out the tests – an appropriate facility should be arranged
- How are you going to use the test results
- What would be the arrangements for any staff members who do not wish to be tested
- Affordability of implementing a testing programme
- The legal bit: how the testing programme will comply with health and safety, equality, data protection and employment law

We supply the testing service and will explain to you:

- The pros and cons of testing your staff
- Reliability and limitations of results
- What a test result means
- How we are following relevant measures around testing, as set out in government guidelines

Informing staff about the testing programme

You should provide clear information to your employees on the following points:

- Why are you setting up a testing programme?
- Is it voluntary or mandatory?
- Consequences for members of staff who refuse to participate or refuse to share their test results
- What staff should do after getting their results
- Where staff can go to for advice on their rights after receiving the test result

You may want to consult your staff association or union prior to implementing any policy around a potential testing programme.

There is also some useful guidance on GPDR and the Data Protection Act 2018 from the Information Commissioner's Office (ICO) you may wish to consider before you set up a testing programme:

Principle (a): Lawfulness, fairness and transparency

Individual Rights

How should I tell people about how we're processing personal data during the pandemic?

Choosing a testing company

In choosing us for your test company, we will use accredited processes and will source consumables from a reliable source. We are DHSC accredited and have been recommended for BS EN ISO 17025 – the gold standard for tests and calibration laboratories.

Collecting COVID-19 samples for testing

While waiting for their test results, individuals should:

- Self-isolate if they are symptomatic. People in their household or support bubble should self-isolate as well until the test result comes back
- If asymptomatic, they do need to self-isolate. However, if they develop symptoms, they should self-isolate until the test result has been received. So should people in their household or support bubble

Handling samples in transit

We prefer for one of our collectors to conduct the sampling and they will deliver the samples to our laboratory.

However, if you choose to send samples to us, you must follow the [World Health Organization guidance on regulations for the transport of infectious substances 2019-2020](#).

The provisions set out in [The Control of Substances Hazardous to Health Regulations 2002 Schedule 3: Additional Provisions Relating to Work with Biological Agents](#) should also be met both by employers and third-party health care providers.

Collection of results

Use of technology and apps to collect, store and share results

If using an app to capture, store and disseminate results, you need to make sure it complies with the [Medical Devices Directive 93/42/EEC](#).

It should capture only the minimum data necessary.

Reporting positive test results

If an employee tests positive for COVID-19, we will notify Public Health England or the proper officer of the relevant local authority, in line with the [Public Health (Control of Disease) Act 1984](#) and the [Health Protection (Notification) Regulations 2010](#).

In order to report the case, we would have to provide the following information to the national surveillance system that holds all test results:

- First name
- Surname
- Date of birth
- Gender

- Postcode
- Contact telephone number (preferably mobile)
- Contact email
- Ethnicity
- Sample taken date
- Sample number
- Sample type
- Test method (PCR, for example)
- Result (i.e. COVID-19 +ve/-ve)
- Result date
- Name of laboratory

Public Health England has approval from the Secretary of State to process confidential information associated with notifiable causative agents and notifiable infectious diseases without patient consent. See Regulation 3 of the Health Service (Control of Patient Information) Regulations 2002.

Contact tracing staff

Internal employee COVID-19 tracing systems

Internal tracing systems offer reassurance to staff, but it is important to consider how these will work alongside NHS Test and Trace.

NHS Test and Trace

The NHS Test and Trace has been set up to ensure that anyone with COVID-19 symptoms can be tested quickly for the virus, help find recent close contacts of anyone who tests positive and ask them to self-isolate if necessary.

The laboratories processing the tests are legally required to inform Public Health England if they identify a positive test, so NHS Test and Trace can contact the individual concerned, collect information about their recent contacts and tell them if they must self-isolate.

NHS Test and Trace will usually not contact employers unless two or more positive cases are related to a work setting. Contact your local Health Protection Team if there is more than one COVID-19 case on the premises of your business.

Employers should not be tracing any contacts outside the workplace. Such cases should be referred to the local Health Protection Team instead.

Tracing systems and Statutory Sick Pay

When employers develop their own internal tracing system, they should consider carefully how internal tracing will interact with NHS Test and Trace and how this will impact employee rights such as Statutory Sick Pay. There are several possible scenarios:

- A member of staff is identified as a contact by an internal contact tracing system, but not by NHS Test and Trace – in this instance they will not qualify for Statutory Sick Pay. You can still decide to keep them away from the workplace, but you should arrange for them to work from home. If that is not possible, you may have to keep them on full pay, unless their contract states otherwise.
- A member of staff in contacted by NHS Test and Trace as well – the employee will be eligible for Statutory Sick Pay from the day NHS Test and Trace has told them to self-isolate.
- An employer decides to keep an asymptomatic member of staff away from the workplace as a precautionary measure – the employer should provide the affected employee with relevant public health advice. They do not have to self-isolate, unless contacted by NHS Test and Trace.

Communicating results to staff

Employers and third-party healthcare providers are obliged by law to directly share all results from virus tests with any tested member of staff who asks to see them.

The results should be communicated by a healthcare professional or someone who works in occupational health or HR. When communicating the result, they should use non-medical language and provide advice on what actions should be taken next.

If results are communicated to the workforce via text message or app, a healthcare professional or a person owing a similar duty of confidentiality should be accessible to employees to discuss the results.

How to communicate a positive virus test case to your staff

Keeping staff informed about potential or confirmed COVID-19 cases in the workplace is encouraged. However, when communicating such information, employers should not disclose individuals' names and should not unlawfully share anyone's personal data.

What you can do with a test result

Employers can use results from virus tests in order to stay informed about positive COVID-19 cases among the workforce. This can help understand who needs to self-isolate to limit the spread of the disease.

What you cannot do with a test result

Employers should make sure that any sensitive health data collected from staff, including their test results, does not lead to any harmful or unfair treatment of employees.

You should not be using and retaining information for purposes staff would not reasonably expect or were not told about.

Next steps

Providing a COVID-19 safe environment for employees and customers is a challenge many businesses face. Social distancing and good hygiene are important and effective measures, but employers may need an extra layer of reassurance.

Establishing an internal testing programme for staff can help you navigate the pandemic working world with more confidence and ease. We hope the guidance outlined in this white paper will help you make an informed decision when taking your business forward.

If COVID-19 testing for employees is something you would like to explore, please contact us on 0191 543 9302, email us at support@geneblitz.com or see https://geneblitz.com/employer/ for further information.