

# Implementing a workplace-initiated 'test on arrival' rapid antigen testing program

## ACTPS WHS COVID-19 guidance

Workplace initiated COVID-19 'test on arrival' rapid antigen screening programs are designed to screen people entering a workplace for COVID-19, where that workplace is considered high risk or where significant, unavoidable risks to health and safety and business continuity are anticipated were a workplace exposure to occur.

'Test on arrival' rapid antigen test programs are designed to screen those entering for COVID-19 to prevent outbreaks and undetected transmission. 'Test on arrival' rapid antigen testing programs require a number of conditions to be met to be an effective control measure in addition to existing COVID-safe controls.

These conditions include:

- > the workplace work health and safety (WHS) risk assessment indicates high and unavoidable risks were a workplace exposure to occur, despite a range of COVID-safe measures and controls being in place
- > the workplace is identified as higher risk of transmission with an increased risk to vulnerable service users, residents or detainees were an outbreak to occur (such as correctional facilities and aged care accommodation)
- > the workplace business continuity plan identifies immediate, significant and unavoidable business continuity risks were a workplace exposure to occur
- > there are suitable resources, infrastructure, and planning to ensure legislative requirements for management of sensitive personal and health record data associated with the testing program
- > there are controls in place to address the known limitations of rapid antigen testing in detecting true positive cases of COVID-19 based on viral loading, poor specimen collection, or when larger numbers of people with a lower risk of infection are tested.

For most ACTPS workplaces, a 'test on arrival' rapid antigen testing program is unlikely to be required.

Those workplaces who, after having conducted a risk assessment, determine they have significant, immediate and unavoidable risks to WHS and business continuity may consider implementing a 'test on arrival' program.

Implementing a workplace initiated COVID-19 rapid antigen 'test on arrival' program is one potential mechanism for reducing COVID-19 risks, however it would not alone be sufficient to meet a directorate's

WHS responsibilities, even where immediate, significant and unavoidable business continuity and WHS risks were identified as justifying the program.

A 'test on arrival' program cannot be used to allow symptomatic workers to attend the workplace. Workers who present with symptoms must leave the workplace and follow the ACT Health advice for testing and quarantine.

The potential effectiveness of a workplace initiated COVID-19 rapid antigen 'test on arrival' program must be assessed in the context of all relevant COVID-19 safety controls applicable to the work areas in question including, but not limited to:

- > hand washing and sanitisation options
- > workers staying home when unwell and getting tested if they have COVID-19 symptoms or as directed by ACT Health
- > maintaining physical distancing of 1.5m where possible
- > reducing the movement of workers between workplaces, including working from home where possible
- > having methods in place to determine and make contact with any high and moderate risk contacts after an exposure in the workplace (when a worker has attended the workplace during their infectious period), in addition to any contact tracing measures that are implemented as part of the response for ACT Health (such as the Check in CBR app)
- > workplace cleaning regimes that meet the SafeWork Australia requirements
- > mask wearing indoors or where physical distancing is not feasible
- > optimising ventilation where possible
- > keeping up to date with, and implementing, public health directions and public health advice and
- > having procedures in place to respond to the risk of potential false negative results.

This guidance is designed for ACTPS workplaces who:

- > are considering a workplace initiated COVID-19 rapid antigen 'test on arrival' program for their workers
- > have identified an increased risk to WHS due to the working environment were a workplace exposure to occur and
- > there would be an immediate, significant and unavoidable risk to business continuity were a workplace exposure to occur, that could not be reasonably managed by usual controls in lower risk workplaces .

These workplaces may also need to consider, in consultation with their workers, whether the risk of a service user being infectious warrants consideration of whether people entering the workplace as a visitor will be required to undergo a rapid antigen test.

# Considerations for designing and implementing a workplace initiated COVID-19 'test on arrival' rapid antigen screening program<sup>1</sup>

## 1. Workplaces must take a risk-based approach

### Consider what is reasonably practicable

As is required when implementing any WHS measures, workplaces must take a risk-based approach when considering what is reasonable in their circumstances. This includes, but is not limited to, considering the following factors:

- > the nature of the workplace
- > the duties of employees
- > the ability to implement, and the effectiveness of alternate controls
- > the service users
- > business continuity planning
- > unintended consequences of implementing another control
- > consultation with the workforce
- > the logistics and resources associated with the delivery and oversight of the program implementation including availability of an adequate supply of rapid antigen tests to support the program and
- > reasons for employees or others not participating in the program, such as medical reasons.

### Undertake a risk assessment to identify and manage the risk associated with the program

When considering the design and implementation of a rapid antigen test program, the workplace must undertake a risk assessment to identify and manage the risks arising from the rapid antigen test program itself, including but not limited to:

- > supply and availability of test kits
- > reliability of test results
- > participation by workers as voluntary, mandatory and/or sample
- > participation by service users and visitors to the workplace or service (including contractors, labour hire, third party providers)
- > whether workers will be required to participate in rapid antigen testing at third party venues when performing their duties
- > fraud or dishonesty
- > attendance at work when symptomatic or experiencing mild symptoms
- > psychosocial risks, such as stigma, anxiety, privacy concerns
- > education and training requirements
- > records management, including health records and

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<sup>1</sup> Guidance for the provision of rapid antigen testing for COVID-19 screening in non-clinical settings, October 2021, Victoria Department of Health

- complacency and reduced compliance with existing COVID-safe controls.

## 2. Workplaces must design the program to address their risks

### Overview of the program design

Workplaces need to consider a range of factors<sup>2</sup> in the design of a workplace initiated COVID-19 rapid antigen screening program, including, but not limited to:

- > The program design needs to consider the employees and/or role, and or visitors /others in the workplace/s to which the program applies.
- > The scope of the program should be determined by the risk assessment and should not extend to roles or workplaces that do not have a significant uncontrolled risk of being exposed to COVID-19 or transmission to vulnerable people.
- > The program must state the period of application of the screening and a review date.
- > The program design needs to consider how the screening will be undertaken. Workplaces can implement point of care testing which, the TGA recommends is managed by either:
  - collection by a healthcare practitioner or a trained member of the workplace
  - self-collection by an employee under the supervision of a trained member of the workplace or
  - remote supervision of sample collection.

Workplaces can also implement self-testing, which does not require the oversight of a registered health practitioner as the employee interprets and reports the test result themselves. Whilst self-testing programs do not require workplaces to consider the on-site assessment and health practitioner oversight, workplaces must still have consideration of the other factors for implementation such as:

- > whether the program is voluntary or mandatory
- > how the requirements of the program will be communicated to employees
- > how employees who are unwilling or unable to participate in the program (e.g. due to medical reasons) will be managed
- > how the timing of the testing will be managed in relation to the employee's shift time
- > the capacity of program (if point-of-care testing), including management of times of peak testing (e.g. shift start times)
- > how participant details and results would be registered and recorded
- > making clear that workplace initiated COVID-19 rapid antigen testing must not be used by a worker to replace or delay usual testing requirements. Workers who are notified of being a contact, or who have symptoms, must not delay testing with the intent of waiting until they will be tested at work; and
- > how positive results will be managed, including notification to high and moderate risk workplace contacts of a positive case and privacy of the employee.

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<sup>2</sup> The Therapeutic Goods Administration ([TGA](#)) and the [Victorian Department of Health](#) have guidance that describe the requirements for implementing a rapid antigen testing program in workplaces.

### 3. Selection of COVID-19 rapid antigen tests

Only [approved rapid antigen tests registered](#) with the TGA can be used for COVID-19 testing in Australia. Workplaces wishing to implement a COVID-19 rapid antigen screening program with their workers or at their workplaces, must refer to information available on the [TGA website](#) on processes and protocols to have in place to conduct testing safely.

Workplaces should confirm whether there is a preferred supplier arrangement with a particular type of rapid antigen test or existing stock in possession of the ACTPS or their directorate that they can utilise prior to seeking to procure their own.

Rapid antigen tests must be used in accordance with their specific 'instructions for use'.

### 4. 'Test to stay' rapid antigen test program logistics

Depending on the program design, screening may be done at home or at the workplace. Workplaces must consider the broader logistical requirements associated with the screening, including, but not limited to:

- > rapid antigen test device availability
- > provision of, and training in the use of, personal protective equipment
- > clinical waste management
- > supervisory workforce required to manage the screening approach
- > storage requirements/facilities and
- > workforce impact associated with screening time.

The program must consider the procurement approaches of the screening devices and personal protective equipment to ensure ongoing provision for the period of the program.

Workplaces must have regard to paid hours of work if the testing program requires a worker to conduct a rapid antigen self-test outside of the workplace or outside of the worker's usual work shift (for example, testing at home before arriving at the workplace).

### 5. Site management and operation

If an onsite program, workplaces must determine:

- the screening site location and connection with the workplace/employee role
- arrangements for communication to employees
- management of waiting times from testing to results
- waste management; and
- implementation of other COVID-19 safety controls.

### 6. Management of results

The program must detail how results from the rapid antigen test will be managed, including:

- > arrangements to ensure employees who receive a positive antigen test result are supported to leave the workplace, isolate and adhere to the ACT Health advice for those who test positive for COVID-19, including their responsibility to [report their positive test result directly to ACT Health](#)

- > if the employee has been in the workplace when infectious (two days prior to the positive rapid antigen test result), the workplace must [identify the risk](#) to other workers who have been in contact with the worker and notify those who may need to get tested, isolate or quarantine, depending on the level of risk of getting COVID-19 (whether high or moderate) and
- > arrangements for how employees will confirm their rapid antigen negative result so that they may commence work, ensuring that all other COVID safe practices are continued and
- > arrangements to repeat the rapid antigen test if an inconclusive result is received and proceed to a PCR testing if inconclusive on subsequent tests.

The program must consider how the personal details of employees who have participated in the program will be managed including whether any documents produced in the delivery of the program would constitute a health record. Workplaces must have resources, systems and infrastructure in place to meet the requirements for storage, access and destruction of health records and for management of sensitive personal information as required under the Health Records (Privacy and Access) Act 1997 and the Information Privacy Act 2014.

## 7. Management of leave

Workplaces need to consider how leave will be managed when a positive rapid antigen test result is detected through a workplace initiated COVID-19 rapid antigen screening program. The employee must leave the workplace, and should isolate, and follow ACT Health advice for people who test positive to COVID-19. Employees should be supported in the following way:

- > If they are **asymptomatic or experiencing mild disease** and would otherwise have been fit for work, the employee will be supported to work from home if possible. If working from home is not possible, the manager should discuss COVID-19 leave arrangements with the employees until they are able to leave isolation / quarantine and return to work.
- > If they are **unwell and unable to work**, manager should discuss COVID-19 leave arrangements with the employees.

## 8. Non-compliance and exemptions

The program design needs to describe the situations for exemption from the workplace initiated COVID-19 rapid antigen screening program, the level of decision making for exemptions, the actions required to obtain an exemption and the consequences for an employee due to an exemption.

## 9. Review of the program

The program must consider the evolving COVID-19 situation and risk and include a review date to reassess the need for the program. The review must consider:

- > community transmission levels
- > supply and availability of antigen tests
- > public health restrictions impacting community movement; and
- > any unintended consequences of the program such as resourcing, employee feedback, WHS incidents, service impacts.

## Resources and more information

- > [TGA website](#)
- > [Point of care rapid antigen testing: guidance for implementation and checklist for businesses](#) (TGA)
- > [Rapid antigen test information for businesses](#) (NSW Health)
- > [Rapid antigen testing](#) (VIC Health)
- > [COVID-19 rapid antigen tests for business owners](#) (Business.gov.au)
- > [Types of COVID-19 tests](#) (ACT Health)
- > [Positive rapid antigen test result form](#) (ACT Health)

