

Checklist

Ethical framework for asymptomatic COVID-19 testing Staff in workplaces

1. Design and operation of the programme



- Is a testing programme the right choice for your organisation?
- Have you assessed whether you can reasonably deliver every aspect of the programme?
- Have you established an appropriate governance structure, and ensured you can deliver on public health and legal duties, including requirements relating to notification of test results?
- Have you planned for a range of scenarios and put contingencies in place, such as business continuity plans in situations where large numbers of staff test positive?

2. Goals of the programme



- Programme goals: what are they, why have you chosen them, and are you reasonably confident you can achieve them?
- Have you communicated them clearly to staff?
- Do you have a plan for monitoring whether the goals are being achieved?

3. Properties of the test



- Have you made a full assessment of the available testing options?
- Have you considered the most recent evidence surrounding testing technologies, and the most recent official guidance?
- Have you considered the likelihood of false negatives and false positives, and taken any steps to mitigate the associated harms?
- Have you emphasised the need to maintain all guidance on hygiene, distancing and ventilation even if people have negative tests?

4. Enabling isolation



- Do you have the right support in place to enable staff to isolate effectively?
- Have you ensured that staff who test positive are fully aware of the requirement to isolate, and what support is available to them?

5. Choices regarding participation



In making a decision about how far participation in the programme will be voluntary or mandated, have you taken into account:

- ethical principles?
- the nature of the employee-employer relationship?
- relevant laws?
- the impact on the programme's effectiveness and fairness across staff groups?

In making your decision, have you considered the risks of conflict, loss of trust, and staff not cooperating with the programme?

Have you clearly explained to staff your expectations of participation?

6. Benefits, harms, and opportunity costs



Have you assessed the possible benefits, costs, risks and harms of the programme, taking into account issues of equality, diversity and inclusion?

Are there any staff groups that might be more adversely affected than others by the programme, and what will you do if so?

Do you feel able to give an account of the reasonableness of the decision-making process and decisions made?

7. Privacy, confidentiality and data-sharing



Does the programme meet data protection and confidentiality requirements?

Have you determined whether a data protection impact assessment is needed for the programme?

Have you made clear who will be informed of a positive test result, including notification of public health authorities, and what contact tracing mechanisms will be activated?

Are you aware of and compliant with relevant legal and ethical requirements for any use of data beyond the programme itself?

8. Communication



Do you have a communications strategy in place to ensure effective and accessible communication with staff that is sensitive to issues of equality, diversity and inclusion?

Is there a dedicated channel for participants to provide feedback and to raise concerns about the programme? Have you told participants it is available and how to access it?