

Guideline on the submission of COVID-19 related health data from workplaces to the National Department of Health

(Guideline document prepared by the OHS workstream on Surveillance of Workers – Covid-19 response. Version 1, 19 August 2020)

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PREAMBLE

Interventions at workplaces and work activities will assist in reduction of transmission of Covid-19 infections. These interventions can appropriately be directed by the data emerging from workplaces about the unfolding pandemic.

In terms of Regulation 4(10) of the Regulations made by the Minister of Cooperative Governance and Traditional Affairs in terms of section 27 (2) of the Disaster Management Act, 2002 (Act No. 57 of 2002) on 29 April 2020 and amended on 28 May 2020 requires employers in the construction, manufacturing, business and financial sectors, with more than 500 employees to submit screening and testing data to the Director-General: Health. Furthermore, the Department of Employment and Labour's Direction further requires all employers to "inform the Department of Health" of all workers who test positive. In addition, the Department of Mineral Resources and Energy: Mine Health and Safety Act (29/1996) Guidelines for a Mandatory Code of Practice on the Mitigation and Management of Covid-19 Outbreak of 18 May 2020 requires employers to maintain, and provide as requested, monitoring and investigation data to the Department of Health.

The objectives of this Guideline of the National Department of Health is to effectively collect, collate and analyse workplace data on clinical (symptom) screening, vulnerable employees, Covid-19 infections and contacts to prevent further escalation of the pandemic and to provide clarity to the relevant stakeholders about the data and data reporting process as outlined in the above legislation, and to streamline the reporting tasks of employers.

PURPOSE OF THE OCCUPATIONAL HEALTH SURVEILLANCE SYSTEM

- Provide strategic insight through data analytics and visualization into all phases (i.e. symptom screening, testing, vulnerable employees, contact tracing within the workplace, clinical management and health outcomes) of the COVID-19 infection spectrum in the South African workforce.
- Early identification of sectors/companies and occupational groups at high risk of infection so as to inform appropriate interventions (e.g. policy, programs, resources).
- Understand the impact of the COVID-19 interventions in the workplace.
- Develop a framework for a COVID-19 surveillance model for monitoring workers in general (and health workers in particular), that includes both public and private sectors.
- Determine the human resource and economic impact of COVID-19 on the various sectors.
- Identification of key scientific questions requiring further investigation.

CATEGORIES OF DATA

Under this Guideline, the following categories of data are to be collected by employers and submitted to the Department as per the procedures described.

- 1. Vulnerable Worker Data: All employers are legally required to identify those employees who are considered to be vulnerable for the more severe outcomes of the COVID-19 infection. As this is a key component of the screening of workers, this data must be submitted to the Department by employers. The data required are listed in Table 1 in the Appendix Templates.
- 2. Daily Symptom Screening Data: All employers are legally required to screen all employees entering their work premises on a daily basis. This screening must be based on the prescribed set of symptoms defined by the National Institute of Communicable Diseases to determine those persons likely to be presenting with a COVID-19 infection, and therefore should be referred for further assessment. This daily data must be submitted to the Department by employers. The data required are listed in Table 2 in the Appendix Templates.
- **3. COVID-19 Testing Data:** Based on their daily symptom screening, or on their employees' presentation to their health provider, employees are referred to health providers / health laboratories for testing for the presence of the COVID-19 virus. In terms of managing the pandemic in the workplace, the employer is expected to be notified of the results of the

tests. All employees who are subject to testing and the results of such testing must be submitted to the Department by employers. The data required are listed in Table 3 in the Appendix Templates.

- 4. High exposure risk Workplace Contact tracing: When an employee tests positive within the workplace, all those in contact must, as per the Department of Employment and Labour Direction, must be assessed for a high risk or low risk of exposure. A high risk of exposure is defined as being in close proximity (<1.5m) for a prolonged period of time (>15 minutes) without the use of personal protective equipment and/or a face mask. Those with such high risk of exposure are expected to be placed in quarantine. The total numbers of employees placed in quarantine as a result of the high exposure risk must be reported when a positive employee is reported. The data required is included in Table 3 in the Appendix Templates.
- **5. Post Infection Outcomes Data:** Recovery from the infection will vary based on vulnerability and other risk factors. Understanding the outcomes of the infection among employees provides critical information. All employers who indicate employees have tested positive must submit information about the outcome of the infection. The data required are listed in Table 4 in the Appendix Templates.

SUBMISSION PROCESS

In collecting this information from their employees, employers are obliged to inform employees about the submission of this data to the Department.

All the above data must be submitted to OHSworkplace@nioh.ac.za at the National Institute of Occupational Health (NIOH), the statutory entity designated by the Department of Health for the collection, analyses and reporting of the data from workplaces This clause does not remove the legal obligations by employers to sector specific government Departments (Department of Employment and Labour, Department of Public Service and Administration and Department of Mineral Resources and Energy, Department of Trade, Industry and Competition etc).

It is recommended that all the data be submitted in electronic format. In instances where employers are already using electronic applications, they can submit data to the NIOH data lake either through CSV data files and/or secure API transfer. Companies are also welcome to contact the NIOH to obtain further information about already developed software packages.

In the event that an employer does not currently use electronic systems, their data can be submitted by using a pre-packaged CSV data file. The excel spreadsheets for collection of screening data, vulnerability data, testing and outcome data can be obtained from the NIOH website (www.nioh.ac.za).

The following steps are required for submission of data:

- 1. The business obtains a registration portal link from the NIOH, by emailing OHSworkplace@nioh.ac.za.
- 2. The business registers electronically by supplying the following details:

Business name
Business industry
Business address
Business province
Business district
Total number of employees
Total number of female employees
Total number of male employees
Business contact name
Contact email
Contact number
Date of registration

- 3. The business details will be verified and registration will be confirmed.
- 4. The system administrator generates a unique ID for the business that the business will use to login to the system to submit data.

PROTECTION OF PERSONAL INFORMATION

All data submitted under this Guideline strictly adheres to the Protection of Personal Information Act (4/2013) and follows the Guidance note on the processing of personal information in the management and containment of COVID-19 pandemic in terms of POPIA by the Information Regulator (South Africa, Department of Justice).

https://www.justice.gov.za/inforeg/docs/InfoRegSA-GuidanceNote-PPI-Covid19-20200403.pdf.

NIOH will be accountable for processing personal information of subjects in a responsible, legal and reasonable manner in order to detect, contain and prevent the spread of COVID-19.

All employees must be made aware by the employer that their information is being submitted to NIOH.

Although NIOH will receive identifiable data, once received each employee will immediately be assigned a unique identifier, which will permit linkages across the different data categories. Once this is done, all identification data is immediately delinked from submitted data.

The data will be kept as per the following guidelines

- Personal data: for six weeks
- Anonymised data: to be kept as long as required for research and development purposes in line with the data sharing agreements
- Processed data and reports to be kept as long as required by legislation governing the collection of this data

The Department will observe the highest standards of data storage, management and security, as stipulated in the Regulations of the Disaster Management Act, the Protection of Personal Information Act and other international standards. Technical and organisational measures will be in place to prevent the loss or damage to or unauthorized access of personal information. All personal information will be confidential and will only be disclosed if required to do so by law.

APPENDIX: TEMPLATES

Workplaces will have choice of the methods of submitting the data. The following spreadsheets can be downloaded from the NIOH website, and once completed, emailed to NIOH

Table	1.	Vulnerability	assessment	Data	
templa	ate				

Vulnerability Data EmployeeID BusinessID Province District Sex Age **Job Category** Comorbidity List Asthma Chronic Lung Disease Diabetes, Hypertension, Serious heart conditions Chronic kidney disease Chronic liver disease Immunocompromised **Tuberculosis** previous Tuberculosis current HIV **Risk Factors** Age=>60 years, Smoking current, Pregnancy => 28 weeks Obesity

Table 2. Daily Symptom screening data template

tempiate	
SCREENING DATA	
BusinessID	
Consent	
Employee ID	
Screening Date	
Employee Age	
Employee Gender	
Job Category	
Province	
District	
Symptoms Status	
Fever	
Chills	
Dry Cough	
Sore Throat	
Shortness of Breath	
Tiredness	
Lack of smell or taste	
Conjunctivitis (Red Eyes)	
Diarrhoea	
Runny nose or congestion	
Muscle pains	
Nausea or vomiting	
Dizziness	
Headache	
Screening Outcome-	No a
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No action required Referred for self-isolation Referred for testing Referred to the doctor

Table 3. Employee COVID-19 Positive test data template

TESTING DATA

EmployeeID BusinessID Province District Sex Age

Job Category Test Date

Test Type PCR

Antigen Antibody

Symptoms Positive Number High Risk

Contact Test Result

Test Result Action

Sick Leave

Self-Isolation at home Isolation at quarantine site

Hospitalization

Exposure Work contacts

Information Community contacts

Family contacts

Large events contacts Travel history from a designated hotspot Public transport

Reporting Actioned Reported to NMC

Reported to Provincial CDC/District office

Reported to Department of Employment and Labour Reported to COIDA Reported to DMRE

Table 4. Positive Employee Post Infection Clinical Outcome template

CLINICAL OUTCOMES

EmployeeID BusinessID Province District Sex Age

Job Category Hospitalisation Date Admission Outcome (discharge,

death) Date

Return to Work Date

Return To Work Fitness Fit for Job Description

Fit with Accommodation Fit with restrictions Temporarily unfit for Job

Description
Unfit for review
Permanently Unfit

Compensation Claim % Disablement

COID Claim Reference No