

# 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 3: 1 October 2020)

#### Contents

WHAT IS NEW IN THIS GUIDELINE	1
PREAMBLE	
PURPOSE OF THE OCCUPATIONAL HEALTH SURVEILLANCE SYSTEM	
SCOPE OF APPLICATION	
CATEGORIES OF DATA	3
SUBMISSION PROCESS	4
PROTECTION OF PERSONAL INFORMATION	5
APPENDIX: TEMPLATES	6

### WHAT IS NEW IN THIS GUIDELINE

- Clarification of scope of application and conformity with the latest Department of Employment and Labour directive.
- o Frequency of reporting for each of the categories of data has been added.
- o Revised reporting templates are available in the appendix.

## **PREAMBLE**

Various interventions, aimed at a national and local level, at workplaces and work activities can contribute significantly to the reduction of transmission of Covid-19 infections. These interventions can be appropriately directed and further refined by routine data submitted by 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 and 17 September 2020 requires employers to follow the directives from the Department of Health and the Department of Employment and Labour. Furthermore, the Department of Employment and Labour's Direction, as amended on 28 September 2020, further requires employers to submit relevant information of all workers who test positive to the National Institute for Occupational Health. 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 status of employees, Covid-19 infections and contacts to identify hotspots at an early stage so as to prevent further escalation of the pandemic. This guideline has been developed to provide clarity to the relevant stakeholders about the data and data reporting process as required by the above legislation, and to streamline the reporting tasks of employers.

#### PURPOSE OF THE OCCUPATIONAL HEALTH SURVEILLANCE SYSTEM

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

#### SCOPE OF APPLICATION

This Guideline details the requirements of existing legislation stated above, and applies to workplaces as stipulated in these.

- 1. All workplaces are required to submit information on those employees who test positive as per the guidelines detailed below;
- 2. All employers in the sectors with the threshold number of employees referred to in the Regulations, are to submit the various categories of data detailed below.
- 3. All departments at local, provincial and national levels of government are to submit the various categories of data detailed below

Those employers submitting data via the Occupational Health Surveillance System will no longer be required to submit the same data to the National Institute of Communicable Diseases and Director General: Health as has been the practice to date.

#### 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. Since this is a key component of the screening of workers, this data must be submitted by employers. The vulnerability status of each worker that is submitted is not dependent on the availability of detailed medical information being available to the employer. This once off submission is submitted when collected by the workplace, and any subsequent occasion when new appointments are made or an employee's status requires updating. 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 as has been 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 collected data must be submitted by employers, for those employees that are symptomatic. The data must be submitted on a weekly basis should there be symptomatic workers recorded during the calendar week. The submissions should occur before Tuesday for the previous calendar week commencing on Sunday. 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. The results of the laboratory tests of all employees who test positive must be submitted by employers, upon receiving the results of such tests. In addition, employers need to submit details in Template 2 for such individuals. *This submission occurs only when an employee tests positive for COVID-19 and should be submitted on a weekly basis should there be positive workers identified during the calendar week.* 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, 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 employees 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 risk exposure should be submitted on a weekly basis should there be positive worker/s identified during the calendar week. Individual details of the high exposure risk contact need be reported. The data required is included in Table 3 in the Appendix Templates.
- 5. Post infection outcome and Return to Work 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, and the return-to-work decision. No confidential clinical information is required. This data must be submitted once only when the employee returns to work. 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 categories of data must be submitted to the OHSS portal (https://www.nioh.ac.za/home/national-resources-directives-guidelines/) 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 report COVID 19 related information to 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 at <a href="OHSworkplace@nioh.ac.za">OHSworkplace@nioh.ac.za</a> to obtain further information about already developed software packages that could be used for this purpose. Employers may choose to use the Centre for Science and Industrial Research (CSIR) CMORE software, that has been developed with public funding and freely available to use. Organisations can use the CMORE mobile and/or web platform to submit data. The data collected via CMORE are transferred to the NIOH data lake. Employers may contact the NIOH at <a href="OHSworkplace@nioh.ac.za">OHSworkplace@nioh.ac.za</a> if they are interested in this service. The templates referred to in this Guideline are already built into this application.

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 return to work data can be obtained by contacting the NIOH at <a href="https://orw.orkplace@nioh.ac.za">OHSworkplace@nioh.ac.za</a>.

The following steps are required for submission of data:

- 1. The business registers by accessing the portal link directly: https://ohss.nioh.ac.za/
- 2. The business registers electronically by supplying the following details:

- 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 and storing personal information of subjects in a responsible, legal and appropriate manner.

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 as described in the COGTA regulation 8(11)(c).
- 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.

Data points heighted in yellow are submitted voluntarily. All other information is mandatory.

Table 1. Vulnerability assessment Data template (Once off submission. Updated when new appointments are made or an employee's vulnerability status changes)

EmployeeID (This refers to the SA National ID or a business generated unique ID for each employee)				
BusinessID				
Province				
District				
Sex (Male/Female)				
Age (Years)				
Job Category				
Vulnerability Status	Yes/No			
If yes answer below:				
Comorbidity Detail:	Yes/No/Unknown	Risk Factors:	Yes/No/Unknown	
<mark>Asthma</mark>		Age=>60 years		
Chronic Lung Disease		<mark>Smoking current</mark>		
<mark>Diabetes</mark>		Pregnancy => 28		
Hypertension,		<mark>weeks</mark>		
Serious heart conditions		<u>Obesity</u>		
Chronic kidney disease				
Chronic liver disease		Received Flu Vaccine	Yes/No/Unknown	
<u>Immunocompromised</u>				
Tuberculosis previous				
Tuberculosis current				
HIV				

Table 2. Daily Symptom screening data template (Submitted weekly for employees with positive symptoms)

BusinessID Consent Employee ID (This refers to the SA National ID or a business generated unique ID for each employee) Screening Date Employee Age **Employee Gender** Job Category Province District **Symptoms Status** Yes/No If yes: **Fever** Chills Dry Cough Sore Throat **Shortness of Breath Tiredness** Lack of smell or taste Conjunctivitis (Red Eyes) Diarrhoea Muscle pains Nausea or vomiting Dizziness Headache Screening Outcome-No action required Referred for self-isolation Referred for testing Referred to the doctor

Table 3. Employee COVID-19 Positive test data template (Submitted as necessary on a weekly basis)

EmployeeID (SA National ID)

EmployeeID (Business generated ID)- [This ID is required if used for the employee in templates 1,2 &4]

BusinessID Province District

Sex (Male/Female/Other)

Age

Job Category Test Date

Test Type Unknown

PCR Antigen Antibody Yes/No

Symptoms Positive

Number of High Risk Contact/s

Vulnerability Status Yes/No

**Test Result Action** 

Sick Leave

Self-Isolation at home Isolation at quarantine site

Hospitalisation

Exposure Information Unknown

Work contacts Community contacts Family contacts Large events contacts

Travel history from a designated hotspot

Public transport

Reporting Actioned Reported to Department of Employment and Labour

Reported to COIDA Reported to DMRE

Table 4. Return to work template (Submitted when the COVID 19 positive employee returns to work)

Employee ID (This refers to the SA National ID or a business generated unique ID for each employee)

BusinessID Province District

Sex (Male/Female)

Age (Years)

**Job Category** 

Hospitalisation Yes/No

Hospital type Public/Private/Unknown

Date Admission (If hospitalised)
Outcome
Discharge
Death

Outcome Date
Return to Work Date
Return To Work Fitness

Date
Fit for Job

Fit with Accommodation
Fit with restrictions
Temporarily unfit for Job

Unfit for review Permanently Unfit

Compensation Claim Yes/No <a href="#">" Yes/No</a> <a href="#">" Yes/No</a> <a href="#">" Yes/No</a>

**Unknown** 

COID Claim Reference No 000000 (if not known)