

Children and Young People Committee

SSPP05

Inquiry into school sun protection policy

Evidence from NASUWT Cymru



WRITTEN
EVIDENCE

**The Children and Young People Committee
Inquiry on sun protection for children and young people at
school or in childcare
March 2012**

1. The NASUWT welcomes the opportunity to submit written evidence to the Children and Young People Committee (CYPC) Inquiry on sun protection for children and young people at school or in childcare.
2. The NASUWT is the largest teachers' union in Wales and the UK representing teachers and school leaders.

GENERAL COMMENTS

3. The NASUWT notes that this inquiry has been generated in light of the petition received from the cancer charity Tenovus that calls on the Welsh Government to provide free sunscreen for all children under the age of 11 in Wales.
4. The NASUWT has no doubt that Tenovus would be able to provide the medical evidence to support the value of making such provision in primary schools in the fight against skin and other forms of cancer and would not presume to offer opinion on this matter.

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5. However, the NASUWT Health and Safety Representatives' Handbook 2009 provides advice about the risks to the health of staff due to exposure to the sun¹ (see also Annex A below).
6. The NASUWT suggest that in the course of this inquiry, the CYPC may wish to reflect on the risks identified in this advice as they would apply to pupils as well as the school workforce.
7. Further, the NASUWT refers the CYPC to the National Institute for Health and Clinical Excellence document *Skin cancer: prevention using public information, sun protection resources and changes to the environment*² and the World Health Organisation *Sun Protection: A Primary Teaching Resource*³.
8. Although the need for schools to establish sun protection policies, and to ensure the provision of shade in schools, is recognised, the NASUWT is clear that the responsibility for the provision of sunscreens and appropriate clothing must largely rest with parents and carers.
9. The NASUWT maintains that school sun protection policies should define clearly the expectations that parents and carers can have of schools and local authorities and the Welsh Government when their children are placed in the charge of a school, and the expectations that schools can have of parents and carers in ensuring the protection of their children from the long and short term hazards associated with exposure to the sun.

SPECIFIC COMMENTS

¹ <http://www.nasuwt.org.uk/system/search/index.htm?search=Sunscreen&stype=QUICK>

² <http://www.nice.org.uk/nicemedia/live/13310/52562/52562.pdf>

³ <http://www.who.int/uv/publications/en/primaryteach.pdf>

10. The NASUWT offers the comments that follow in relation to the questions posed on the letter from the CYPC.

Question 1: Whether current sun protection policies and guidelines for schools are effective in providing sufficient sun protection for children, and if not, where improvements are required.

The NASUWT has no reason to doubt the effectiveness of the current sun protection policies and guidelines for schools, other than noting the request made in the petition from Tenovus.

However, the NASUWT maintains that such policies and guidelines should address the risks associated with allergies to sunscreen, transfer of head lice with hats, the appropriateness of sun glasses in terms of pupil age and other health and safety implications.

Further, the NASUWT believes that account should be taken of the risks associated with over-protection that can result in vitamin D deficiency. The NASUWT understands that this risk can be more problematic for certain racial groups as darker skin requires more sunlight to generate sufficient levels of vitamin D.

Question 2: Whether there is sufficient awareness of the current sun protection policies and guidelines, and, if not, how best to raise awareness.

The NASUWT notes that a simple 'google' search will provide access to sunscreen guidance and would be confident that schools are not only aware of their responsibilities in this area but also ensure that parents and carers are reminded of the need for the provision of adequate protection through the issuing of appropriate reminders and relevant information.

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Question 3: Whether there are any barriers to the use of sun protection in schools, including sunscreen, suitable clothing, hats or shade, by children and young people, for example in terms of cost or the application of sunscreen by teachers or childminders, and if so, how these could be addressed.

The NASUWT advice to members on the application of sun screens to pupils is recorded in the NASUWT Health and Safety Representatives' Handbook 2009 (reproduced below at Annex A below).

The NASUWT is clear that teachers should not apply sunscreen to pupils. The NASUWT maintains that pupils, where possible, should apply the creams themselves, or be kept indoors.

The NASUWT is aware that some schools ask parents and carers to apply sun screens to pupils before they go into school.

The NASUWT recognises that the cost of sunscreen and appropriate clothing may be a barrier for some parents and carers and that there can be no guarantee that all pupils will be sent to school with the appropriate protection. Consequently, the NASUWT maintains that the need for schools to provide adequate and appropriate shaded learning areas is paramount to protecting pupils from the harmful effects of sun light.

Given the increased emphasis on outdoor activities, particularly in the Foundation Phase, the NASUWT is concerned that the clear need to provide areas of shade has placed an additional financial burden on many primary schools which is all too often covered by fund raising through parent/teachers associations rather than by the provision of funding and or resources from the local authority or, indeed, the Welsh Government.

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Rex Phillips

Wales Organiser

For further information on this written evidence contact Rex Phillips, Wales Organiser.

NASUWT Cymru

Greenwood Close

Cardiff Gate Business Park

Cardiff

CF23 8RD

029 2054 6080

www.nasuwt.org.uk

nasuwt@mail.nasuwt.org.uk

Annex A

Extract from the NASUWT Health and Safety Representatives' Handbook 2009 (page 60)

Sun – exposure

Whilst all teachers have a duty of care towards the pupils in their charge, Health and Safety Representatives may be approached by staff concerned about risks to their own health if they take part in out-of-doors activities such as sports days, educational visits, etc.

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The employer's duty to avoid exposing employees to foreseeable hazards should be taken seriously when considering any out-of-doors event. A risk assessment should be integral to the planning process and should take into account the following facts:

- ultraviolet (UV) radiation is made up of UVA and UVB rays. UVA ages the skin and UVB burns. Both can cause skincancer;
- skin cancer is one of the most common cancers in the UK and the number of people who get it is increasing;
- over 2,300 people die from skin cancer each year in the UK;
- it is believed that malignant melanomas occur on sun-damaged skin and are caused by short, sharp, excessive exposure to the sun, i.e. sunburn;
- non-melanoma skin cancer is believed to be caused by long-term exposure and is thought to be less dangerous;
- people with pale skin are most vulnerable to ultraviolet-related skin problems, particularly those with freckles, red hair or a genetic predisposition;
- employees have a duty to take care of themselves and others and should take adequate precautions before engaging in outdoor activities; and even on a cloudy day UV radiation may be damaging.

Best practice is to avoid exposure, but if sunscreens are used they should be those that provide protection against both UVA and UVB rays and have a high protection factor. Their effectiveness can deteriorate over time.

Teachers should not apply sunscreen to pupils, who should, where possible, do so themselves, or be kept indoors.

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