

Policy title: SUN (UV) PROTECTION FOR STUDENTS

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Legislation:

- [Work Health and Safety Act 2011](#)
- [Work Health and Safety Regulations 2011](#)

1. POLICY STATEMENT

- 1.1. The ACT Education and Training Directorate (the Directorate) has a duty of care and responsibility to ensure that adequate sun protection is provided for all students and workers, including pre-service teachers and volunteers. This applies while they are on school premises during school hours or undertaking outdoor school activities when Ultra Violet (UV) levels are 3 and above.
- 1.2. In Canberra sun protection is required for part or most of each day between August and May. The end of May is 'Hats Off Day' whilst the beginning of August is 'Hats On Again' for all of us.
- 1.3. Due to low (under 3) daily UV levels experienced in Canberra from June to July, ACT schools will not be required to enforce sun UV protection in this period. However sensible sun UV protection may still be warranted if spending extended period outdoors during these months i.e. at all day outdoor sporting events and excursions.
- 1.4. This policy refers specifically to students. However, for their own protection and under the current [Work Health and Safety Act 2011](#) all Directorate workers are required to follow this policy and guidelines developed by the school to reduce occupational UV exposure.
- 1.5. All workers, in providing for their own workplace protection, are also providing a role model for students.
- 1.6. Through the school's curriculum, students will be made aware of the healthy balance required between UV exposure, sun UV protection and vitamin D exposure across the year.
- 1.7. Students with no hat will be required to play in a well shaded area. This is informally known as 'No Hat Play in the Shade'.
- 1.8. In meeting their sun protection duty of care objectives, ACT primary schools are encouraged to join the Cancer Council's [National Schools Program](#) for policy support, resources, professional learning and training opportunities and to be acknowledged for their school's efforts in skin cancer control.

- 1.9. Information about the Cancer Council's [National Schools Program](#) can be obtained from [Cancer Council ACT's website](#). ACT primary schools can also view their current SunSmart status from the [Cancer Council ACT's website](#).

2. RATIONALE

- 2.1. This policy aims to protect students and workers, as far as reasonably practicable, from the dangers associated with over-exposure to the sun's UV.
- 2.2. Australia has amongst the highest rate of skin cancer in the world – at least 2 in 3 Australians will develop skin cancer before the age of 70. Exposure to UV is a major contributory factor in the development of skin cancer.
- 2.3. UV comes both from direct and indirect sunlight, it is also scattered in the atmosphere. UV is also reflected from surrounding surfaces such as water, sand, concrete and snow. High levels of radiation are received in wide open areas where there is no shade, such as school ovals, even on a cloudy day.
- 2.4. UV levels reach 3 and above in Canberra for part or most of each day between August and May which warrants sensible sun protection during this part of the year.
- 2.5. In Canberra annual UV levels peak during the daylight saving/summer period between 11am and 3pm. ACT Schools will therefore aim to reduce time outdoors during this period, or otherwise take particular care if outdoors during this peak UV period i.e. seek shade at all times.
- 2.6. Sun UV protection is recommended at all ages, as the risk of developing skin cancer risk is reduced at whichever age sun protection is used.
- 2.7. Childhood and adolescence are critical periods during which exposure to UV radiation is more likely to contribute to skin cancer in later life, including melanoma. UV exposure during the first 18 years of a person's life is the most critical risk factor for skin cancer, and also causes skin damage and premature ageing. This is important to remember in the secondary school setting.
- 2.8. Most Australians receive the bulk of their Vitamin D supply from exposing their skin to small amounts of UV in sunlight most days of the week. Due to low levels (under 3) of UV in Canberra during the winter months, Cancer Council ACT does not generally recommend sun UV protection in June and July. This is to reduce the risk of Vitamin D deficiency in the ACT region.

3. DEFINITIONS

- 3.1. **Duty of Care:** legal duty of care requires that teachers and workers should take all reasonable measures to ensure the safety of a school student under their care. This duty of care will arise whenever a student/teacher-worker relationship exists.
- 3.2. **Parents/Carers:** people with parental responsibility and guardians.
- 3.3. **Workers:** teachers and staff employed by the Directorate.
- 3.4. **Sensible:** covering as much skin as possible from UV levels.

3.5. **Sunburn:** a radiation burn to the skin.

3.6. **UV or UVR:** Ultraviolet Radiation

4. LEGISLATION [Work Health and Safety Act 2011](#) and [Work Health and Safety Regulations 2011](#)

4.1. The main objective of the [Work Health and Safety Act 2011](#) and [Work Health and Safety Regulations 2011](#) is to protect workers, students and visitors against harm to their health, safety and welfare through the elimination or minimisation of risks as reasonably practicable.

5. PROCEDURES

5.1. Local School Guideline Development

5.2. Each school must develop and adhere to sun UV protection guidelines that comply with this policy using [Attachment A](#), UVR Protection Checklist for Schools - Cancer Council ACT as a guide. The information contained in this attachment is consistent with Cancer Council ACT's [National Schools Program](#) recommendations:

- sun UV protection guidelines in schools must be developed in consultation with the school community and the School Board
- parents must be informed of the school's sun UV protection guidelines. This may be achieved by publishing the guidelines in the school handbook and school newsletters. Parents should also be informed that a full copy of the Directorates [Sun UV Protection Policy](#) is available for inspection at the school
- schools actively promote positive sun UV protection behavior and attitudes via school newsletters, website, school events and assemblies
- schools will be required to review their sun UV protection guidelines at least once every 3 years. Schools with national SunSmart status will be required to submit a copy of their current guidelines to Cancer Council ACT. The school guidelines will be updated, if required, to maintain national SunSmart standards and best practice.

5.3. Protective Clothing and Hats

- Between August and May students and workers are required to wear SunSmart hats (e.g.: broad-brimmed, bucket with deep crown or legionnaire hats) that cover the face, ears and neck.
- Broad-brimmed hats should be at least 6cm for children (7.5cm for teens and adults). Bucket style hats should have an angled rim that is suitable for the size of the child's head (a minimum of 5cm as a guide) a minimum of 6cm for older children and adults.
- Sunhat cords can become caught and become a strangulation risk to

children playing on fixed playground equipment. Schools must request that parents either purchase sun hats with safety cords designed to break under minimal strain, or remove cords from sunhats altogether.

- When students are required to wear sun hats, schools will not permit them to access fixed play equipment unless one of the above hazard controls is met.
- Schools must support the wearing of sun protective clothing. Loose fitting, closely woven cotton fabrics and shirts with a collar and longer sleeves and longer skirts and shorts are recommended.
- Sun protection clothing is incorporated into the school uniform/dress code. Sensible uniform design requires covering as much skin as possible.
- All students will be required to wear at least a t-shirt or a rash vest ('rashie') when attending all day outdoor swimming carnivals.
- Schools will support the wearing of sunglasses all year round. For best sun UV protection, a close fitting wrap-around pair should be worn that meets AS 1067.

5.4. **Shade Provision**

- All students will be reminded, directed and encouraged to use the school's designated shade areas when playing, eating etc. This is particularly important during the daylight saving/summer months when UV levels peak.
- School communities are required to maintain and/or increase shade provision in school grounds for future generations. This includes the planting of shade trees and shade structures.

5.5. **Wearing of Sunscreen**

5.6. Whilst sunscreen is considered the final line of defence against UV related skin damage, ACT schools will consider effective strategies that will allow for the daily application of sunscreen by both students and workers who choose to wear it. Because current school uniforms tend to leave significant areas of skin (arms and legs) exposed, sunscreen will play an important role in school's sun UV protection guidelines. These guidelines require that:

- schools actively support and promote the daily use of broad spectrum, water resistant SPF 30 or higher sunscreen on exposed skin that cannot be protected by clothing/uniform
- parents are reminded and encouraged to supply SPF 30 or higher, broad spectrum, water resistant sunscreen as part of their child's school equipment
- parents are reminded that sunscreen should be applied at home before leaving to school
- schools are required to make sunscreen accessible to all students and

workers for daily applications throughout the day. Schools have sunscreen in most, if not all classrooms

- where practicable students are given daily opportunities and reminders to apply sunscreen 15-20 minutes prior to the lunch break (the peak UV period of the day) and before participating in outdoor activities i.e. PE etc
- students are encouraged to apply sunscreen themselves
- staff will exercise judgment as to whether some students, for example, younger children, should be supervised or assisted when applying sunscreen
- schools will inform parents/carers at the beginning of the school year that there may be occasions when workers will need to apply sunscreen to children. Parents/carers should be requested to inform the school if they do not wish workers to apply sunscreen to their children
- if a child is allergic to sunscreen, parents/carers must notify the school about this on the medical form completed at the beginning of each school year. Parents/carers have the option of providing a hypoallergenic sunscreen for their children.

5.7. **Rescheduling Outdoor Activities**

5.8. Minimise the time spent outdoors between 11am and 3pm (Daylight Saving/Summer Time). Some strategies might include:

- planning all day outdoor events i.e. athletic/swimming carnivals not to occur during the peak UV period of the year when the risk of sunburn is significantly increased
- timetabling outdoor physical activities, excursions and outdoor classes earlier in the day
- holding assemblies indoors, under shade or at lower UV times
- making lunch times shorter and morning breaks longer
- keeping students indoors or under shade at lunch times, until they have eaten their lunch.

5.9. **SunSmart Tools and Professional Learning Opportunities**

- ACT schools are encouraged to display the SunSmart Web Widget on their school's website to assist their school community toward better understanding when sensible sun UV protection is and is not required each day in Canberra.
- ACT teachers and workers are encouraged to complete [Cancer Council Generation SunSmart Professional Learning online modules](#). Upon completion teachers and workers will receive a Certificate of Completion and their school acknowledged by Cancer Council.

6. Records management

- 6.1.1. Records must be kept in accordance with the [Territory Records Act 2002](#) and *Territory privacy principles* outlined in the [Information Privacy Act 2014](#).
- 6.1.2. Further information about [records management](#) procedures including registration, storage and disposal is available on Index.

7. Complaints

- 7.1. Any concerns about the application of this policy or the policy itself, should be raised with:
 - the school principal in the first instance;
 - the Directorate's Liaison Unit on (02) 6205 5429;
 - online at http://www.det.act.gov.au/contact_us;
 - see also the *Complaints Policy* on the Directorate's website.

8. PROCEDURE OWNER

- 8.1. Director, People and Performance
- 8.2. For support in relation to this procedure contact People and Performance on ph: 6205 9202.

9. RELATED DOCUMENTS

- 9.1. The following documents must be read in reference to the information provide in this procedure document:
- 9.2.
 - [Cancer Council Generation SunSmart Professional Learning online modules](#)
 - [National Schools Program](#)
 - [Personal Protection Equipment Procedure](#)