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Children and Young People Committee

Meeting Venue:
Committee Room 1 - Senedd

Meeting date:
21 March 2012

Meeting time:
09:15

Cynulliad Cenedlaethol Cymru
National Assembly for Wales

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Agenda

1. Introductions, apologies and substitutions (09:15)

2. Inquiry into school sun protection policy (09:15 - 10:00) (Pages 1 - 3)

Tenovus
Dr Ian Lewis, Director of Research, Tenovus

3. Inquiry into school sun protection policy (10:00 - 10:30) (Pages 4 - 6)

Welsh Local Government Association

Dr Chris Llewelyn - Director of Lifelong Learning, Leisure & Information
Daisy Seabourne - Lifelong Learning Policy Team Manager

(Break 10:30 - 10:40)

4. Inquiry into school sun protection policy (10:40 - 11:20) (Pages 7 - 10)

Association of School and College Leaders Wales (ASCL Cymru)
Gareth Jones - ASCL Cymru Secretary

National Association of Head Teachers (NAHT Cymru)
Anna Brychan - Director NAHT Cymru
Graham Murphy - NAHT Cymru President

5. Motion under Standing Order 17.42 to resolve to exclude the public for the remainder of the meeting (11:20)

6. Inquiry into school sun protection policy: Consideration of further action (11:20 – 11:40)

7. Forthcoming Legislation (11:40 – 12:00)

8. Papers to note

Inquiry into school sun protection policy: Paper from Lisa – member of the public (Page 11)

Inquiry into school sun protection policy: Michael Ball (Page 12)

Inquiry into school sun protection policy: Dermatology Council for Wales (Pages 13 – 14)

Inquiry into school sun protection policy: Public Health Wales (Pages 15 – 18)

Inquiry into school sun protection policy: NASUWT (Pages 19 – 24)

Inquiry into school sun protection policy: UCAC (Pages 25 – 27)

Inquiry into school sun protection policy: National Childminding Association Cymru (Pages 28 – 30)

Inquiry into school sun protection policy: Royal College of Physicians (Pages 31 – 32)

Children and Young People Committee

CYP(4)-10-12 Paper 1

Inquiry into school sun protection policy

Evidence from Tenovus

Each year over 10,000 people in the UK are diagnosed with malignant melanoma, the most dangerous and potentially lethal form of skin cancer. In Wales alone there are around 500 cases each year with over 100 deaths.

The rise in the incidence of malignant melanoma is truly alarming. In Wales, between 1999 and 2009 the number of cases in both men and women has more than doubled and this trend shows no sign of abating[1].

Tenovus are particularly concerned about young people as research has shown that sunburn in childhood can double the risk of getting skin cancer later in life and a recent survey carried out by the Teenage Cancer Trust showed that nearly a third of teenagers never use sunscreen and a quarter will actually try to burn on purpose[2].

Therefore, in 2010 as part of our sun awareness campaign *Here Comes the Sun*, we launched a petition calling for the Welsh Government to provide free sunscreen for children under the age of 11 in Wales. However, we fully recognise that such provision would only be one aspect of what needs to be a holistic approach to sun protection.

Currently there are a number of initiatives in schools that support teachers in providing sun awareness messaging and guidance to their pupils. For example the Healthy Schools Initiative, which we are pleased to see is now being extended into pre-school settings. However our understanding is that currently sun safety is not a requisite topic and only one of a number of healthy living areas that a school may focus on.

There have also been some excellent examples of resources produced by individual local authorities to support schools such as the *Sun Protection Guidleines for Early Years and Childcare Settings* in Caerphilly County Borough. However again these guidelines are not mandatory and very much depend on the buy in of individual schools.

Therefore, whilst policies and guidelines exist, as far as we are aware there is no specific monitoring of which schools have implemented them and how effective they have been in raising awareness of sun safety amongst their pupils. There also needs to be an audit of schools to determine what measures they have already implemented to ensure that their pupils are not being exposed to potentially dangerous levels of UV in their breaks and

lunchtimes. This will not only highlight which areas of sun protection need better provision in our schools but could also uncover models of best practice that are already being implemented in individual schools or Local Education Authorities.

A number of models of best practice already exist globally where their sun awareness policies are much more advanced in the education system. For example, in Australia where skin cancer rates have historically reached epidemic proportions, there are UV policy documents that provide advice on how to take a whole school approach to sun safety. This includes guidance on the provision of shade, appropriate hats and clothing, the timing of outdoor events, training of staff and sunscreen provision. In fact some schools in Australia currently provide broad spectrum, water resistant sunscreen for free to pupils and staff.

They also provide guidance on when the guidance does not need to be followed to ensure that they pupils receive sufficient Vitamin D outside of the summer months when the UV index is at a sufficiently safe level[3].

Whilst there are obviously difficult financial pressures in Wales at the moment there is no doubt that prevention is always cheaper than cure. A recent study in England showed that the cost of skin cancer was around £240 million per year[4]. If you extrapolate this to Wales then skin cancer costs our health and social care system an estimated £14 million per year.

Research has also shown that the use of sunscreen is highly cost effective in preventing non malignant and premalignant skin cancers which, whilst not as life threatening as malignant skin cancer, still require treatment which will have cost implications as well as quality of life issues for the individual treated[5].

There would also be opportunities to make huge cost savings through the purchasing power of the Welsh Government in relation to the provision of sunscreen. Recent research carried out by Tenovus and the Chartered Institute of Environmental Health identified that if a family with two adults and two children applied the correct amounts of sunscreen at the appropriate intervals then it would cost them £60.84 for a week's supply[6]. However, sunscreen itself costs very little to manufacture with a large chunk cost spent on marketing and individual bottling.

Providing free sunscreen in schools should therefore be considered as one aspect of a comprehensive whole-school approach that is coordinated and monitored as a pan Wales initiative. There must also be a greater investment in the wider issue of sun awareness in Wales. Currently the Welsh Government invests approximately £20k promoting sun safety through the CRUK SunSmart campaign. We feel that this is extremely small investment considering the current costs of treating and supporting people with skin cancer each year in Wales. We also feel that more work needs to be done in the community and in more engaging and relevant ways.

Each summer, Tenovus runs an annual summer long campaign called *Here Comes the Sun* which promotes sun safety messages across the whole of Wales through the use of social media, an online schools package for primary and secondary school children and a sun awareness Ice Cream van which attended more than 40 outdoor events last year alone taking the message to people right at the heart of the community.

Tenovus is delighted that this petition is being debated in the context of the wider issue of sun protection for children and young people and would be really keen to work with the Welsh Government to provide them with a safer and healthier future.

1. Cancer in Wales, 1995-2009: A Comprehensive Report (2011) Welsh Cancer Intelligence and Surveillance Unit
2. Nation Institute of Clinical Excellence, Skin cancer: prevention using public information, sun protection resources and changes to the environment, 2011 Shunburn, Love the sun, respect your skin!
3. SunSmart-In early childhood education and child services http://www.sunsmart.com.au
4. Morris, S and Cox, B and Bosanquet, N (2009) Cost of skin cancer in England. Eur J Health Econ, 10 (3) 267 – 273
5. Gordon LG, Scuffham PA, van der Pols JC, McBride P, Williams GM, Green AC (2009). Regular sunscreen use is a cost-effective approach to skin cancer prevention in subtropical settings. J Invest Dermatol Dec;129(12):2766-71.
6. Barratt J A, Davies C J, Jenkins M, Lewis I, West Rh W. (2010) The effect of behaviour and beliefs on the effective use of sunscreen. Journal of Environmental Health Research, Volume 10, Issue 1, pp65-71

Children and Young People Committee

CYP(4)-10-12 Paper 2

Inquiry into school sun protection policy

Evidence from the Welsh Local Government Association

Introduction

1. The Welsh Local Government Association (WLGA) represents the 22 local authorities in Wales, and the three national park authorities, the three fire and rescue authorities, and four police authorities are associate members.

2. It seeks to provide representation to local authorities within an emerging policy framework that satisfies the key priorities of our members and delivers a broad range of services that add value to Welsh Local Government and the communities they serve.

3. The WLGA welcomes the opportunity to provide evidence to the Children and Young People Committee on the use of sun protection for children under the age of 11 in school or childcare.

4. Local authorities in Wales are aware of the health issues associated with over exposure to the sun, particularly by children and young people. Changes in the curriculum for younger children has made this issue particularly important as the Foundation Phase encourages more outdoor activities for children aged 3 – 7 as part of the play based curriculum. In order to meet this requirement many schools have had purpose-built all weather areas constructed which provide protection from both rain and sun, allowing children to play safely outside. A recent Estyn report on the implementation of the Foundation Phase found that the majority of primary schools were providing a varied, productive and motivating environment for children; this includes the provision of outdoor areas.

5. There are existing guidelines regarding sun protection for children and young people in schools and pre-schools that is provided on the Welsh Government's website written by Cancer Research UK, as part of their Sunsmart campaign. These publications provide a comprehensive, and easily understandable, guide to sun protection within a school setting, although they are not currently available bilingually on the Welsh

Government's website. These guidelines are supported by the Wales Network of Healthy Schools which is a voluntary scheme, funded by the Welsh Government involving schools across Wales.

6. Although schools will be aware of the issues surrounding sun protection existing work could be supported by further awareness raising about the Cancer Research guidelines with schools, for example by the guidelines being highlighted in the Welsh Government's regular circulars to schools at the beginning of each term. Governing bodies of schools could also be made aware of the guidelines through links with organisations such as Governors Wales. Provision of the Cancer Research guidelines in Welsh would be welcomed by the WLGA and local authorities. Local government in Wales would be happy to work the Welsh Government to continue to raise awareness of the guidelines in schools and nursery settings.

7. There are a number of issues that could be seen as barriers to the use of sun protection in schools. In terms of the application of sunscreen for younger children who were unable to apply their own, there could be child protection implications. However, schools and childminders are subject to strict checks and safeguards can be put in place to ensure that the risks are minimised. This should be seen in the context of the overall child protection procedures within schools.

8. It is the view of the WLGA that the provision of free sunscreen to all children under the age of 11 would have to be fully costed before this proposal could be considered. There are currently 1,415 primary schools in Wales that would have to supply sunscreen to all their pupils. This additional cost could be significant. Local government would consider that should this proposal be implemented then the cost should be covered by the Welsh Government, in addition to funding that schools and local authorities already receive.

9. There could also be a cost implication in terms of the use of suitable clothing, hats and shade. The WLGA considers that the provision of suitable clothing and hats should be made by arrangements between schools and parents when appropriate. Ensuring that a school building has adequate shade could have a capital funding implications where building work has not already been undertaken in order to meet the requirements of the Foundation Phase. The 21st Century Schools programme is the strategic programme for capital investment in schools and through this programme is would be possible to raise awareness about the provision of shade in relation to both new build schools and refurbishment projects.

10. In summary the WLGA welcomes the Committee's inquiry into sun protection for children and considers that it is important that children are protected from harmful exposure to the sun whilst in school. The WLGA considers that this should be done through the use of the existing guidelines from Cancer Research.

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NAHT CYMRU
Y Gymdeithas ar gyfer holl Arweinwyr Ysgol
The Association for all School Leaders

ASCL Association of School and College Leaders

Children and Young People Committee

CYP(4)-10-12 Paper 3

Inquiry into school sun protection policy

Evidence from the Association for all School Leaders (NAHT Cymru) and Association of School and College Leaders (ASCL Cymru)

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Date of issue: 21 February 2012

Introduction:

1. The membership of ASCL Cymru and NAHT Cymru comprises most of Wales' school leaders. We are submitting this evidence jointly.

2. The dangers of overexposure to the sun have been much debated in recent years. In that context we appreciate that the intention behind these proposals is to offer an additional measure of protection for children.

3. We would however invite the Committee to consider the following points:

   - Is the science regarding exposure to the sun fully settled? We would suggest that there is a fine line to be drawn between excessive and dangerous exposure to the sun leading to the possibility of melanoma on the one hand; and the possibility of overprotection leading to a lack of Vitamin D on the other. Committee members will be aware of some recent evidence suggesting that a lack of exposure to the sun has in some areas led to the re-emergence of rickets;
   - Is exposure to the sun equally harmful to all parts of the body? Might it not be sensible to consider whether school summer uniforms which specify trousers and long-sleeved cotton shirts might be more sensible than the current arrangements?
   - Would it not be sensible to consider how long a child may be exposed to the sun during a normal school day before determining that sunscreen must be universally applied and provided?
   - We have canvassed our members widely on this issue. They report little parental concern around this. The following is a typical response from a headteacher: *'The number of incidents is more apparent than real. I have yet to deal with a sun-related incident other than a few children playing too hard and getting a bit hot. Risk assessment and common sense are a part of every day life for school leaders. All the swimming associations provide advice on protection based on the fact that children are running about in swimming costumes and are exposed to the sun for longer periods*.'

4. Before introducing this new provision, an informed view must be taken on the following:
   i. Is there a problem?
   ii. Is there a danger that other unwelcome consequences might result from introducing this? Might limiting **beneficial** exposure to the sun bring a series of other problems?
   iii. If there is a problem, does it reside in schools given that children are exposed to the sun for relatively limited periods during the school day and are properly clothed during those periods?
   iv. How would a sensible balance be achieved between the provision of free sun screen and difficulties around allergic reactions which some children may experience after the application of unsuitable sun cream.

5. Without compelling statistical evidence of the nature and scale of the problem and detailed consideration of the issues raised above we believe that proposals for change should be rejected.

Response to Questions posed by the Committee:

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 SunSmart SunProtection Policy guidance, developed by Cancer Research UK and published by the Welsh Government in July 2010 is comprehensive and offers practical guidance for schools. We have no evidence that the guidance has been ineffective.

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

We have no evidence that there is a lack of awareness of the current policies and guidance. We are not aware of the issue having been raised in any Estyn Inspection reports, which include an assessment of student well being;

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 child minders, and if so, how these could be addressed.

There are issues around this. While for the most part these might be resolved by what might loosely be termed a 'common sense' approach, the realities of school life mean that school leaders as a whole would have to consider, and devise procedures to cover, the following:

i.The possibility of legal claims for negligence which could be equivalent to issues arising from the presence of asbestos in the school environment. This would centre on consideration of whether the school allowed children and young people to be exposed to a foreseeable risk while they were under the school's care. It would not apply to children on their way to and from school unless the School Travel Measure is extended to cover that. The issue of potential negligence would turn on the length of time that children are potentially exposed per day including games lessons and the amount of the year that this applies.

ii.Issues in relation to children too young to apply the cream themselves, and who will do it for them. Many schools demonstrate to children how to apply sun screen. This is reasonable and sensible. Schools often help the very youngest children to apply sun screen. While this might seem entirely sensible in individual cases we, as professional associations advise against doing so, for the equally sensible reason that physical contact can be misinterpreted with catastrophic consequences for members of staff.

iii.Similar concerns apply in relation to particularly vulnerable pupils where significant child protection issues are involved. Introducing a duty on schools in this regard would encounter strong resistance from members of staff who might be instructed to apply it;

iv.If free sunscreen is provided, will schools be obliged to make it a rule that pupils apply it? Would failure to comply on the part of the pupil lead to some sanction? If so, this would potentially contravene to the United Nations Convention on the Rights of the Child;

v.Budgetary and staffing implications:

Assuming this duty will involve schools in yet another non-educational duty that will require organisation and the transfer of staff from other duties to assist with supervising the distribution and application of sun cream. From what budget would the costs associated with this be drawn?

Concluding Comments:

- We have detailed a number of practical problems in relation to these proposals which seem to us to ignore the realities of school life and the rights of those who work and are taught in them. If compelling evidence were presented confirming that excessive exposure to the sun **while pupils are in school** is a genuine problem, there might be some merit in trying to arrive at solution for the range of practical concerns we have outlined. Without such evidence, we would urge very strongly that these proposals are not implemented.
- We understand however that there may be some merit in providing free sun screen: it is expensive. Might it not be more sensible to make sun screen available through health centres? This would enable its use by parents and pupils outside school times which, given that most pupils are required to wear full uniform at school, are much more likely to involve prolonged exposure to the sun and occasionally inadequate clothing;
- We agree that schools should ideally have play areas with sufficient shade for children to be able to be outside in hot weather without being in direct sunlight. There may be considerable capital cost involved in ensuring this;
- Sun hats and cool, loose clothing that covers the shoulders and knees with sun-blocking fabric are of course sensible in sunny weather but these are surely for parents to provide, not schools? Might the Committee not consider guidance to parents in this context?

Children and Young People Committee

SP01

Inquiry into school sun protection policy

Evidence from Lisa – A member of the public

Hi, after reading about the idea of free suntan cream for children under 11, I must say I think it is a great idea. My son has free toothbrush and toothpaste each year from school and its encouraged him to clean his teeth regularly. Could a suggestion be that maybe suppliers of suntan cream be offered the chance to go into the schools and talk to the children about the dangers of the sun? They could present the children with a bottle of suntan cream? This could be done freely as they will obviously get advertising for doing this. I'm sure if this was suggested to the larger companies there would be a good chance of them supplying the cream without cost to the assembly? As a further initiative to the companies maybe an offer of free advertising on the assembly website?

Regards Lisa.

Children and Young People Committee

SP02

Inquiry into school sun protection policy

Evidence from Michael Ball

I wish to write in protest at the idea of imposition of sun screen on children in schools. While I am aware that children's skin is more sensitive than adult, and that suffering burning is dangerous, there is an opposite view to take into account.

Much of the rise in skin cancers is probably due to the use of sunbeds, and to "Binge" sunbathing during Mediterranean, Florida, Thailand, Australian holidays, where we have not evolved to cope with the strength of the sun.

There is much evidence that people whose skin is regularly exposed to the sun are not more prone to skin cancer than anyone else, e.g. outdoor workmen and practising naturists.

There is growing evidence of rickets re-appearing among children, at least in part caused by the short times many of them spend outside and in some cases, neurotic mothers who smother them with high factor sunscreen all the time. Ethnic children who evolved to cope with stronger sun are more prone to this problem, especially girls who must remain covered for religious reasons.

Finally, the skin specialists have got the ear of the media, but other oncologists will tell you that on the other hand there is strong evidence that healthy exposure to the sun protects against many other cancers, including breast and bowel cancer, as well as reduce the likelihood of children being born who develop ms and other problems.

Vitamin D in its most useful form is made in skin on sensible exposure to sunlight. Vitamin D is not just a nutrient, but a key factor in the proper functioning of the human immune system, and schools should not help to spread irrational panic about sensible exposure to sunshine.

Michael Ball, grandfather and school governor

Children and Young People Committee

SP03

Inquiry into school sun protection policy

Evidence from Dermatology Council for Wales (DCW)

Dear Sirs
As its chairman, I would like to contribute to the above inquiry on behalf of the Dermatology Council for Wales (DCW). The DCW is a sub-committee of the British Association of Dermatologists but it is a multidisciplinary organisation including patient, nursing and primary care representatives as well as consultant and non consultant grade dermatologists. The DCW also functions as the dermatology national specialist advisory group to the Welsh medical council.
We welcome the petition from Tenovus as it raises the issue of sun protection for children and skin cancer prevention. However, we feel that providing free sunscreen would not be the best use of resources. Generally, consensus opinion in the world of sun protection is that the use of sunscreens should come **after** adequate attention has been given to modifying sun exposure behaviour (ie avoiding exposure between 11am and 2 pm and seeking shade) and the use of protective hats and clothes. This is because sunscreens are only partially effective and suffer from the drawback of being a constant draw on resources as they have to be reapplied carefully 2 or 3 times a day for maximum benefit.
I will expand this argument by answering the specific questions put by the inquiry.

Q. 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?

A. Although I am aware of some locally developed guidelines, I am not aware of any national guidelines for sun protection in Welsh schools. It is obvious from simple observation that many schools do not have shade in the playgrounds and children are often seen in strong sunshine without hats or protective clothing. National guidelines, which could be modified locally, would be a good idea but we feel that any guidelines should emphasise the need for behaviour modification, provision of shade and protective hats and clothes before considering sunscreens.

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

A. We have no data on this issue, but general observation would suggest that uptake of advice is low. A few years ago, my own department ran a competition for local primary and secondary schools asking children to design posters illustrating the need for sun protection. The winning posters were printed professionally and used in health education and the schools received a monetary prize. Getting the children involved is always a good idea and perhaps a similar national competition in conjunction with a launch or prelaunch of guidelines might be successful.

Q. 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 child minders, and if so, how these could be addressed.

A. Good sun protection behaviour and provision of shade should not be too difficult to achieve. Timing of outdoor activities (eg sports) should be outside of the 11am to 2 pm window to avoid the time of most intense sun exposure. Provision of shaded areas should be mandatory in any new buildings. In existing schools, canopies, awnings or trees should be considered. To maximise their wearing and therefore effectiveness, school uniforms including hats should combine good and fashionable design with effective sun protection properties.
Experience from treating children with eczema suggests that there are barriers to applying all creams in school. Some schools will allow the older child to apply creams themselves but it is very rare that teachers/ teaching assistants will apply creams, even moisturisers that have been prescribed, as there are fears of individuals themselves at risk of accusations of assault or inappropriate behaviour –

this would also be a barrier to application of sunscreens. This could be addressed by obtaining written consent from parents and by advising against lone worker application. I.e. the application should be witnessed.

In summary, we are delighted that this issue has been raised but believe that the provision of free sun cream to children in Wales would be less cost effective than addressing other sun protection issues first. Resources would be better directed towards the encouragement of sun exposure behavioural changes, the provision of shade and the encouragement of the wearing of appropriate sun protection clothing. Only after these issues have been emphasised should attention switch to the use of sun creams.

I hope our comments have been helpful. I know that we would be keen to contribute to any further developments in this area and please contact us again if you wish.

Kind regards

Richard Williams

Dr Richard E A Williams

Children and Young People Committee

SP04

Inquiry into school sun protection policy

Evidence from Public Health Wales

Public Health Wales are pleased to respond to the request of the Children and Young People Committee of the National Assembly for Wales for comments on sun protection for children and young people at school or in childcare. Comments on the requested paragraphs are:

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.

- A recent survey by Cancer Research UK, commissioned by the All-Party Parliamentary Group on Skin of 1000 people has shown that approximately 40% of school-age children have arrived home with sunburn sustained at school. [1] The survey also showed that more than 40% of parents believe teachers should be responsible for ensuring children are wearing sunscreen at school. [1]

- The findings also indicate an urgent need for a well-funded, national awareness campaign, alongside a focus on sun education and protection in schools, to stem the growth of the fastest rising cancer in the UK. [2]

- National guidelines recommend that schools should have a sun policy but they are not prescriptive or mandatory. Currently, the decision whether or not to deliver sun safety advice is left largely to the discretion of the individual teacher. The National Institute for

[1] Sun burn and sun safety, on-line survey of 1020 members of t he general public. Eggington Research Associates, commissioned by Skin Cancer UK, May 2011
[2] Cancer Research UK. Skin cancer statistics – Key facts. Available at: http://info.cancerresearchuk.org/cancerstats/types/skin. [Accessed 1st March 2012].

Health and Clinical Excellence (NICE) recommend the provision of shade in schools but this recommendation appears to be disregarded in many United Kingdom schools. [3]

- Schools should produce a robust policy which guides all members of the school community. Children and young people should be made aware of the importance of following safe sun behaviours, both within the curriculum and through extra-curricular activities. This will allow children and young people to learn about the misconception that a sun tan is healthy and encourage children and young people to change their behaviour and adopt safe sun practice. It will also empower them to share information on safe sun practice with their families. [4] Social marketing interventions may play arole in promoting effective behaviour change.

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

- Evidence from recent surveys suggests that there is a lack of awareness of policies for sun protection. The clinical and public health guidance on skin cancer from NICE has been used to inform a website dedicated to skin cancer prevention and early diagnosis from the South West Public Health Observatory www.swpho.nhs.uk/skincancerhub. There is comprehensive information available on the website on methods to improve awareness of the dangers of overexposure to the sun and the importance of sun protection. Public Health Wales is in the process of developing web pages on skin cancer prevention.

- There are also examples of good practice in the literature that could be adopted in Wales. It is recommended that children and young people are involved in the development of a programme of activities that co-ordinate and raise awareness of a culture of safe sun practice within schools leading to the adoption of safe sun behaviour. This may involve for example designing posters and inventing stories to put across key messages. There are excellent posters and leaflets already freely available from the British Association of Dermatologists, the Teenage Cancer Trust and the Cancer Research UK SunSmart campaign. These leaflets and posters will be available in Welsh and English via the planned Welsh skin cancer web pages.

[3] National Institute for Health and Clinical Excellence. Skin cancer: prevention using public information, sun protection resources and changes to the environment. PH guidance 32. NICE 2011.
[4] Skin Cancer Hub. Toolkits. Available at: http://www.swpho.nhs.uk/skincancerhub/resource/view.aspx?QN=COTK_DEFAULT. [Accessed 1st March 2012].

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.

- There are sensitivities around whether it is appropriate for school staff to apply sun screen to children and young people and it is vital that primary schools place particular emphasis on encouraging changes in the habits of parents/carers as well as children and young people. Local authorities and school governing bodies should formulate their own policies on this.

- There is no specific guidance from the Department for Education or the Welsh Education Department on this matter, although it is indicated that school staff are not legally obliged to administer sunscreens but schools should discharge their duty of care by ensuring that children are not over exposed to sun.

- The National Union of Teachers has published a health and safety briefing for sun safety. Self administration of sunscreen by pupils is recommended, apart from the very youngest of children and those with special needs. [5]

- Where cost is concerned the systematic review performed to inform the NICE guidance illustrated the poor quality of evidence on outcomes of the provision of free sunscreen and NICE recommend that parents should provide the sunscreen and children could be taught how to apply it themselves. [6] NICE recommend that teachers should supervise the application of sunscreen, possibly with help from the school nurse or interested parents who volunteer on a rota system to help.

- The Cancer Research UK school skin cancer policy guidelines strongly recommend the planting of trees to provide shade.[7] There is however, a lack of cost effective evidence on the provision of facilities to increase shade provision; the inclusion in new build schools is however recommended by NICE. [3] Preliminary research suggests that school children that have playgrounds with trees were found to have higher levels of physical activity and significantly less

[5] National Union of Teachers. Sun Safety. NUT Health & Safety briefing. Available at: http://www.teachers.org.uk/files/sun_sense.pdf. [Accessed 1st March 2012].
[6] McDaid C, Paton F, Wright et al. Sun protection resources and environmental changes to prevent skin cancer: a systematic review. Centre for Reviews and Dissemination, University of York 2010. Available at: https://nice.org.uk/nicemedia/live/11871/49660/49660.pdf. [Accessed 1st March 2012].
[7] Cancer Research UK SunSmart. Shade for Schools. Available at: http://www.sunsmart.org.uk/schools/shadeforschools/shade-for-schools. [Accessed 5th March 2012].

UV radiation exposure. [8] One survey in the South West found that only 8% of primary schools had performed a formal shade assessment and approximately 66% were not satisfied with the current shade provision within their school. [9]

- One of the potential problems with implementing rigorous sun protection policies is that the evidence suggests that any sun safety measures should not reduce pupil participation in physical activity. An expert paper produced to inform the NICE guidance [3] explores the role of sun protection during outdoor physical activity. [10] The authors indicate that following the recommendations of the Cancer Research UK SunSmart campaign and the World Health Organisation would make outdoor activities off-limits for almost all of the school day (09h to 15.00h). They recommend that where activities cannot be rescheduled, there should be a move towards implementing policies and practices to encourage sun safe behaviour.

[8] Boldemann, C, Blennow, M, Dal H et al., Impact of preschool environment upon children's physical activity and sun exposure. *Preventative Medicine* 2006; 42: 301-8. Cited in Ref. 10.
[9] Bowtell N, Young S, Poirier V et al. Sun protection policy and practice in schools in the South West. Abstract accepted for oral presentation at the UKACR and NCIN Conference 2010. Cited in Ref. 10
[10] Bowtell N, Verne J. Expert paper 5. Physical activity and the school environment. Available at: http://www.nice.org.uk/nicemedia/live/13310/52654/52654.pdf. [Accessed 5th March 2010].

Children and Young People Committee

SP05

Inquiry into school sun protection policy

Evidence from NASUWT Cymru

NASUWT CYMRU
Undeb yr Athrawon The Teachers' Union

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.

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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.

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 sun[1] (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.

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 though parent/teachers associations rather than by the provision of funding and or resources from the local authority or, indeed, the Welsh Government.

Rex Phillips

Wales Organiser

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

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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.

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 sundamaged skin and are caused by short, sharp, excessiveexposure to the sun, i.e. sunburn;
- non-melanoma skin cancer is believed to be caused by longterm exposure and is thought to be less dangerous;
- people with pale skin are most vulnerable to ultravioletrelated skin problems, particularly those with freckles, redhair 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.

National Assembly for Wales Children and Young People Committee: Inquiry into School Sun Protection Policy

Undeb Cenedlaethol Athrawon Cymru (UCAC) welcomes the opportunity to respond to this consultation. UCAC represents 5,000 teachers, headteachers and lecturers in all education sectors in Wales.

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.

Usually, children will only be out in the sun for short periods of time, during break times. However, children in the Foundation Phase can now spend longer periods of time outside the school building. School trips and sports days are other occasions when there is a possibility that children will be in direct sunlight for extended periods.

One important element of sun protection policy for children is the need to educate children about the dangers and how to protect themselves. It is relatively simple to address this element, but guidance or direction to schools around the need to do so, and how to do it, would be useful.

Another important element is the ability of schools to ask parents to make appropriate provision for their children at times when they are outside the classroom for extended periods e.g. appropriate clothing such as hats, sunglasses, long-sleeved clothing and applying sunscreen before children arrive at school.

The two most sensitive elements are: (i) Who exactly will be responsible for what; and (ii) The responsibility for applying sunscreen to the children. We will address these issues below under question 3.

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

An increasing number of schools are adopting such a policy and a policy model is available. The Healthy Schools programme has been one way of raising awareness of the issue, and of the policy.

The best way to raise awareness further would be to circulate any guidance directly to:

- Headteachers (including through Local Authorities)
- Governing Bodies (including through Governors Wales)
- Teachers' unions

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.

Many issues arise. Some areas are unclear and can cause concern and problems for teachers.

a) The school's level of responsibility regarding appropriate clothing

If the parents provide appropriate clothing, that is a good start; however, what is the extent of the school's responsibility in terms of ensuring/insisting that children wear these clothes? Who is responsible if a child has gone out without the appropriate clothing—intentionally or unintentionally?

If parents have not provided suitable clothing, what is the school's responsibility in trying to provide them?

b) The school's level of responsibility with regard to sunscreen

It is very helpful if parents have put sunscreen on their children before they get to school, but this is not likely to solve the problem completely because the lotion needs to be reapplied every few hours to remain effective.

Another question that arises is: who provides any additional lotion that is needed—does responsibility lie with the parents or the school?

However, the most profound and complex questions relate to the responsibility for applying sunscreen to the children. These are some considerations:

- Obviously, applying sunscreen involves touching children; increasingly, teachers are advised to have as little physical contact with children as possible, to avoid any allegations of abuse or inappropriate touching; child protection issues are extremely serious, and such accusations can put an end to a teacher's career – even if they are unfounded.

- Some parents object to the use of sunscreen, for various reasons

- Some children may be allergic to (certain types of) sunscreen.

- Hygiene must be considered when moving from one child to another, especially with regard to skin conditions.

Teachers would find it useful to have clarity on these issues. If it considers drawing up or recommending any new policy or guidelines, we urge the Committee to address these issues so that school staff know the extent of their responsibilities.

Children and Young People Committee

SP07

Inquiry into school sun protection policy

Evidence from NCMA Cymru

Children and Young People Committee inquiry:

Sun protection for children and young people in school or childcare

NCMA Cymru response:

- NCMA Cyrmu welcomes any developments that will help improve the safety and wellbeing of children and young people. NCMA Cymru works with members to ensure they are providing the highest standards of care and learning for children.

- NCMA issues advice via its website on sun safety and provides guidelines and sample policies for registered childminders: http://www.ncma.org.uk/childminders/your_business/policies_and_procedures/sun_safety.aspx

- Registered childminders in Wales are professional childcare providers, committed to ensuring the health and safety of children in their care. The National Minimum Standards for Regulated childcare, which childminders and day care providers are required to comply with, contain provisions directly related to ensuring safety is promoted and '*hazards inside and outside the premises are kept to a minimum'*. However neither these standards, nor the 2010 Childminding and Day care regulations, currently make any particular reference to sun safety and in that regard, current guidelines could be strengthened. Registered childminders are aware of the importance of sun safety and referencing the issue in Regulations or Standards will only strengthen awareness in this area.

- In September 2010, NCMA Cymru submitted a response to Welsh Government regarding the content of the draft National Minimum Standards for childcare providers. In that response, NCMA Cymru stated the following: '*…A related issue around safety, concerns the application of creams eg. Sun protection. Minimum standards should include some reference to childminders and parents agreeing procedures relating to the application of suncream. There is an important child*

protection element to this issue'. This recommendation was not reflected in the final National Minimum Standards for childcare providers, which was disappointing.

- NCMA Cymru does believe that a common sense approach must also be reflected in any guidelines. Parents and childcare providers should work together to ensure children are protected from the harmful effects of the sun whilst also ensuring children are exposed to the health and wellbeing benefits of playing outdoors and being exposed to sunlight, for example, vitamin D production.

- Registered childminders are required to comply with health and safety regulations and must be trained to ensure they understand health and safety requirements for the environment in which they work.

- National Minimum Standard 24.4 states that the registered person is responsible for ensuring that '*Children can play safely outside, through a combination of supervision and protection from hazards'.*

- NCMA Cymru believes that the option of amending the National Minimum Standards to acknowledge the need for sun safety should be explored and we would be happy to work with Welsh Government and CSSIW to agree appropriate wording for this provision. We believe registered childminders could meet any additional requirement by adding to existing policies and procedures and without the need for a significant additional workload. NCMA Cymru believes that the majority, if not all registered childminders, would already have procedures in place to deal with sun safety and would certainly all be aware of the dangers of excessive sun exposure.

- By becoming registered, childminders are already demonstrating their desire to provide a high standard of care and the majority, if not all childminders, will always take account of sun safety in their everyday outdoor activities. However, if sun safety were mentioned specifically in the National Minimum Standards it may help reinforce the messages of charities and public health bodies seeking to prevent skin cancer and associated problems due to sun exposure.

- The application of sunscreen to children clearly is an important issue in terms of protecting the wellbeing of the child, and it is vital that parents and registered childminders agree a procedure for this. Registered childminders will often spend time in the outdoors and children should be protected from the sun with appropriate cream or clothing. There are many important issues associated with this, such as who is responsible for providing sunscreen and who pays for it. In addition, the issue is further complicated by the fact that registered childminders have the freedom to take children outside if weather is good, even if a scheduled outing has not been arranged.

- NCMA Cymru would advise that parents have responsibility for either applying sunscreen prior to a child being placed with a childminder or providing sunscreen for the child in their own bag. Suncream should be a minimum of spf 15 in line with Cancer Research UK and Sunsmart though NCMA Cymru believes that the possibility of raising this minimum level for children to spf 30 should be examined. Registered childminders should ensure that their policies and procedures reflect the need for sun safety and that parents are asked to provide consent that registered

childminders may apply sunscreen. Parents should also provide headwear / appropriate clothing for sunny weather.

- It is vital that public health messages and guidance are promoted to parents through awareness-raising campaigns. It is also important that parents and professionals are aware of their responsibilities when it comes to sun safety and this will hopefully create consistent practices across Wales.

- NCMA Cymru welcomes and supports schemes designed to improve sun safety and awareness. One example is the Caerphilly Sun Protection Guidelines for early years and childcare settings (2008) which provided resources, sample policies and guidelines for childcare providers and parents on sun safety.

NCMA Cymru background

NCMA Cymru (National Childminding Association) is a charity and professional organisation. Since 1977 we have worked with registered childminders and nannies as well as other individuals and organisations, such as local and national government, to ensure families in every community in England and Wales have access to high quality home-based childcare, play, learning and family support. NCMA represents 1,900 members in Wales and 38,000 across Wales and England.

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Children and Young People Committee

SP08

Inquiry into school sun protection policy

Evidence from Royal College of Physicians

Committee Clerk
Children and Young People Committee
National Assembly for Wales
Cardiff Bay
CF99 1NA

By email
CYPCommittee@wales.gov.uk

From The Registrar
Patrick Cadigan MD FRCP
patrick.cadigan@rcplondon.ac.uk

8 March 2012

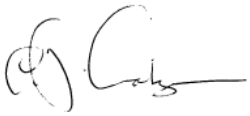
Dear Sir or Madam

Re: Inquiry into school sun protection policy

The Royal College of Physicians (RCP) plays a leading role in the delivery of high quality patient care by setting standards of medical practice and promoting clinical excellence. We provide physicians in the United Kingdom and overseas with education, training and support throughout their careers. As an independent body representing over 25,000 Fellows and Members worldwide, we advise and work with government, the public, patients and other professions to improve health and healthcare.

The RCP is grateful for the opportunity to respond to the above inquiry. In so doing, we have had sight of and would wish to endorse the response submitted by the Dermatology Council of Wales (DCW) a sub-committee of the British Association of Dermatologists. Overall, we welcome the petition as it raises the issue of sun protection for children, and skin cancer prevention. However, our fellows and members are not convinced that providing free sunscreen would provide the best use of resources. We believe that the encouragement of sun exposure behavioural changes, the provision of shade and the encouragement of wearing appropriate sun protection clothing should be emphasised in the first instance.

Yours faithfully



Dr Patrick Cadigan
Registrar

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