

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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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?