



# **Cynulliad Cenedlaethol Cymru** **The National Assembly for Wales**

## **Y Pwyllgor Plant a Phobl Ifanc** **The Children and Young People Committee**

**Dydd Mercher, 21 Mawrth 2012**  
**Wednesday, 21 March 2012**

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Motion under Standing Order No. 17.42(vi) to Resolve to Exclude the Public from the Meeting

Cofnodir y trafodion hyn yn yr iaith y llefarwyd hwy yn y pwyllgor. Yn ogystal, cynhwysir cyfieithiad Saesneg o gyfraniadau yn y Gymraeg.

These proceedings are reported in the language in which they were spoken in the committee.  
In addition, an English translation of Welsh speeches is included.

**Aelodau'r pwyllgor yn bresennol**  
**Committee members in attendance**

Angela Burns	Ceidwadwyr Cymreig Welsh Conservatives
Christine Chapman	Llafur (Cadeirydd y Pwyllgor) Labour (Committee Chair)
Keith Davies	Llafur Labour
Jocelyn Davies	Plaid Cymru The Party of Wales
Suzy Davies	Ceidwadwyr Cymreig Welsh Conservatives
Julie Morgan	Llafur Labour
Lynne Neagle	Llafur Labour
Jenny Rathbone	Llafur Labour
Aled Roberts	Democratiaid Rhyddfrydol Cymru Welsh Liberal Democrats
Simon Thomas	Plaid Cymru The Party of Wales

**Eraill yn bresennol**  
**Others in attendance**

Anna Brychan	Cyfarwyddwr, Cymdeithas Genedlaethol y Prifathrawon Cymru Director, National Association of Head Teachers Cymru
Gareth Jones	Ysgrifennydd, Cymdeithas Genedlaethol y Prifathrawon Cymru Secretary, Association of School and College Leaders Cymru
Dr Ian Lewis	Cyfarwyddwr Ymchwil, Tenovus Director of Research, Tenovus
Dr Chris Llewelyn	Cyfarwyddwr Dysgu Gydol Oes, Hamdden a Gwybodaeth, Cymdeithas Llywodraeth Leol Cymru Director of Lifelong Learning, Leisure and Information, Welsh Local Government Association
Graham Murphy	Llywydd, Cymdeithas Genedlaethol y Prifathrawon Cymru President, National Association of Head Teachers Cymru
Daisy Seabourne	Rheolwr y Tîm Polisi Dysgu Gydol Oes, Cymdeithas Llywodraeth Leol Cymru Lifelong Learning Policy Team Manager, Welsh Local Government Association

**Swyddogion Cynulliad Cenedlaethol Cymru yn bresennol**  
**National Assembly for Wales officials in attendance**

Helen Finlayson	Clerc Clerk
Claire Griffiths	Dirprwy Glerc Deputy Clerk
Philippa Watkins	Gwasanaeth Ymchwil Research Service

*Dechreuodd y cyfarfod am 9.15 a.m.  
The meeting began at 9.15 a.m.*

### **Cyflwyniad, Ymddiheuriadau a Dirprwyon Introduction, Apologies and Substitutions**

[1] **Christine Chapman:** Good morning and welcome to the Children and Young People Committee. I remind everyone that mobile phones, BlackBerrys and pagers should be switched off. In the event of an emergency, an alarm will sound and ushers will direct everyone to the nearest safe exit and assembly point. We have not received any apologies today.

9.16 a.m.

### **Ymchwiliad i Bolisi ar Amddiffyn Plant rhag yr Haul mewn Ysgolion—Tenovus Inquiry into School Sun Protection Policy—Tenovus**

[2] **Christine Chapman:** On 4 October, the National Assembly for Wales's Petitions Committee received a petition from the cancer charity Tenovus, which calls on the National Assembly to urge the Welsh Government to provide free sunscreen for all children under the age of 11 in Wales. That petition has been referred to us for consideration and we have decided to undertake a short inquiry on the broader issue of sun protection for children in schools.

[3] I welcome Dr Ian Lewis, who is the director of research for Tenovus. Thank you for providing your paper in advance, which Members have had a chance to read. Are you happy for us to start with the questions so that we can have a discussion?

[4] **Dr Lewis:** Yes, absolutely.

[5] **Christine Chapman:** Thank you. Could you give the committee an indication of the prevalence of skin cancer across Wales and the extent to which this is linked to sun exposure in childhood?

[6] **Dr Lewis:** Skin cancer is the fastest growing cancer in the UK overall. However, in Wales, in the period from 1999 to 2009, the prevalence of malignant melanoma, which is the most dangerous form of skin cancer, has doubled. So, we are now looking at around 500 people developing malignant melanoma each year, of which there are around 100 deaths. Research has shown that having blistering sunburn as a child can double your risk of getting skin cancer later in life. So, that is why we are interested in talking today about protecting children on the physical level of protecting them from sunburn at a young age and from the consequences of that later in life, and talking about teaching children how their lifestyles and choices can prevent the risk of developing the disease later in life.

[7] **Christine Chapman:** How does the pattern of skin cancer in Wales compare with that of other countries?

[8] **Dr Lewis:** Compared with some hotter countries like Australia, where incidence has reached epidemic levels in the past, our incidence is obviously not as high. We are about the same as equivalent parts of the UK. However, in countries where incidence has been traditionally higher, a number of quite simple measures have been put in place to lower that incidence. So, while they are seeing levels of skin cancer decreasing, we are seeing ours increasing.

[9] **Jocelyn Davies:** Does the prevalence of skin cancer fall into a particular socioeconomic group?

[10] **Dr Lewis:** I considered that, given that, as you probably know, there is a large deprivation gap in relation to a number of diseases, but particularly with cancer, which is increasing. I looked at whether the cost of sun cream being, in many cases, prohibitive was driving and increasing skin cancer rates in poorer communities, and I found that it is about the same in different socioeconomic groups. That is probably because, if you are more wealthy, you are more likely to be taking foreign holidays and spending more time outdoors. So, the incidence is quite similar across the different groups.

[11] **Jocelyn Davies:** Yes, but for different reasons within those different groups—

[12] **Dr Lewis:** Yes, for potentially different reasons. So, if it was possible to dig into that a bit deeper, it may be that we would find disparity.

[13] **Christine Chapman:** Why does it affect children and young people in particular? Is there an issue with that particular group?

[14] **Dr Lewis:** Adults can make their own choices. Admittedly, there is still a gap in awareness, and we see that among sunbed users in particular, but, when it comes to children, you have to be much more proactive in providing them with information and the tools to protect themselves.

[15] **Suzy Davies:** Without going into too much detail, you mentioned that the incidence has doubled since the late 1990s. A lot of us will remember that people did not use sun protection at all in the 1970s. Therefore, can you explain why it is only latterly that the incidence has doubled, or are the roots of it back in the 1970s?

[16] **Dr Lewis:** Yes, I think a great deal of it goes back to the advent of foreign holidays. Traditionally, particularly in Wales—a country that does not necessarily have lots of sunshine—we go out and look to burn ourselves and get as much sun as we can. We binge tan, in a way. We have also seen the advent of sunbed use. I am really pleased that the Welsh Government took steps to try to counteract that. However, even today, we look as though we are still setting ourselves up for the rise to continue to increase. A recent study by the Teenage Cancer Trust showed that a third of young people do not use sun protection and that a quarter actually look to burn themselves on purpose. So, you can see that the message is still not quite working with all groups.

[17] **Julie Morgan:** Following on from that, people think that it is attractive to be suntanned. Is there any way you think you can counteract that? That is the big issue really, is it not? It is slightly different with children, but teenagers and older people see this as something to aim for.

[18] **Dr Lewis:** Absolutely, yes. It is incredibly difficult. The most effective message is that tanned skin is actually damaged skin and that damaging your skin now will make your skin age faster and cause you to have wrinkles. So, we need to turn that opinion on its head. Some of the most effective anti-smoking messages focused on the effect on looks rather than health. One of the challenges of any health message to young people is that, at that age, they feel a bit invincible and older age seems a long way away. There are clever ways to turn that on its head.

[19] **Julie Morgan:** There are certain parts of the country where there are hot spots, certainly for the use of sunbeds. Is that true of the incidence of skin cancer as well? I remember that, looking at the UK, Liverpool was a place where people used sunbeds a lot. Is

that reflected in the figures?

[20] **Dr Lewis:** I do not know. I do not know whether the data exist by individual county. They probably do, and I can look into that.

[21] **Julie Morgan:** It would be interesting to know. I have an idea that there was an issue with Swansea as well.

[22] **Dr Lewis:** With regard to the incidence of skin cancer, from the work we did previously on sunbeds and their relationship with skin cancer, I know that sunbed use is higher in places like the Valleys and Swansea. With regard to sun protection behaviours, I am not sure.

[23] **Christine Chapman:** Would you be able to provide us with a note on that?

[24] **Dr Lewis:** Yes, certainly; I would be happy to.

[25] **Christine Chapman:** That would be great.

[26] **Julie Morgan:** Moving on to the issue of your Here Comes the Sun campaign, can you tell us what the main elements are?

[27] **Dr Lewis:** About two years ago, we were looking for a new way to take health messages out to communities. It is something we are really active in generally. As an organisation, as much as possible, we try not to print leaflets. We know that only a certain number of people will ever visit a website to read something proactively, because they have to be aware of the issue and then go looking for it. So, we thought 'Let's take our messages out to the people who need to hear them. What's the best way to spread sun-awareness messages? Let's buy an ice cream van'. So, we bought an ice cream van and took it to a series of events around Wales. In the first year, we rented one to pilot it and took it to four or five events with high footfall—the Royal Welsh Show, a number of beach events and so on—but last year, we took it to about 40 or 50 different events, including beach events and the eisteddfod, where we had really strong support for the petition.

[28] What was interesting was that we turned up at a number of events on sunny days and a large number of people did not have any sun protection with them. We were providing sachets of free sunscreen to people and giving them a squirt from a bottle. The number of people who did not have provisions was amazing, particularly the number of people with children sitting in prams or young children. That was a double whammy for us in that we were able to step in—admittedly, only transiently for that one event—but in giving someone that free sunscreen we would make a deal with them by saying 'By the way, here's some information on the broader issue of sun awareness'. So, that was a worthwhile activity on two fronts.

[29] In terms of the events that we went to, the support for what we were doing was high. We upset a number of children who thought that we were actually an ice cream van. *[Laughter.]*

[30] **Jocelyn Davies:** You disappointed a lot of children.

[31] **Dr Lewis:** We disappointed a lot of children that year. I was like the anti-Santa Claus, but, from the parents, we broadly got a huge amount of support and it was a nice way of getting the message across. We are expanding that this year into a schools resource, which is bilingual and free to use. It is a resource for junior school children, which builds on the curriculum and existing curricular activities. There is a secondary school resource as well that

looks at the provision of shade and how schools can develop their own shaded areas.

[32] **Christine Chapman:** I know that Suzy wants to come in at this point.

[33] **Suzy Davies:** I note from your written evidence that this is aimed at children and young people specifically, rather than drawing it to the attention of parents and carers. Perhaps you can tell us little about what you are doing on that score. Secondly, if we are talking about educating families rather than young people, have you done any work with midwives and the providers of Bounty packs for newly born children, especially those who are born in the summer?

[34] **Dr Lewis:** We have not; that is a good idea. We have started to engage with school nurses and we are keen to start working with community nursing teams more broadly. That is an excellent idea and we will look at it.

[35] **Suzy Davies:** What about parents and carers, because that is where it has to start?

[36] **Dr Lewis:** Absolutely. Again, the Here Comes the Sun campaign was more of a hook for the parents than the children. In addition, to look at it in another way, the schools resource, which takes the message to children and gives them activities that they will take home with them, is a way of bringing the message home. That is a technique that has been used for a number of different health interventions, particularly around diet most recently.

[37] **Suzy Davies:** Did it work?

[38] **Dr Lewis:** We have only just launched the school resource, so it will take us a while to get into the curricula of the various schools and promote the resource. So, we will come back to you next year.

[39] **Aled Roberts:** Rydych wedi dechrau sôn am ysgolion. Beth yw eich barn ynglŷn ag agwedd bresennol Llywodraeth Cymru tuag at amddiffyn plant rhag yr haul mewn ysgolion? **Aled Roberts:** You have started to talk about schools. What is your view about the Welsh Government's current approach to protecting children from the sun in schools?

[40] **Dr Lewis:** Currently, there is quite a lot of good, comprehensive and sensible guidance around. However, it appears that sun-awareness teaching and practice in schools, and this holistic approach to sun protection in a school setting, are not mandatory and not part of official guidance for schools, if you get my drift; at the moment, it is a passive set of guidelines that schools can choose to adopt if they would like to. As we have been looking into this issue for this debate, we have seen that it can be quite ad hoc—not just on a school basis, but also on a teacher-to-teacher basis.

9.30 a.m.

[41] However, conversely, we have talked to teachers who would welcome more guidance, because this issue is increasingly highlighted, not just in terms of the incidence of cancer, but also of the incidence of it being debated publicly. Therefore, parents are asking more questions. Giving teachers more clear guidelines to follow and providing them with tools that they could use to protect children will benefit those teachers and help to support them. There are a number of great initiatives in schools at the moment, including the healthy schools initiative, but sun awareness is not a mandatory part of that. A number of different health interventions can be covered, relating to smoking, diet and alcohol, but there is not necessarily a component for teaching sun awareness in school; it is very much ad hoc—

[42] **Christine Chapman:** I am sorry to interrupt, but you talked about teachers welcoming more guidance—do you mean guidance on practical things, such as whether or not they should put sunscreen on a child, or on the actual risks involved? I would imagine that many people are now aware of these issues, particularly teachers—although I may be assuming too much here. Which would it be?

[43] **Dr Lewis:** Rather than being about individual teachers, it is more about the school in its entirety. The sunscreen issue is one issue in itself; sunscreen use would only ever be a component in a sun protection strategy. Sunscreen use brings with it different issues—for example, it does not make you completely impervious to damage from the sun. There are some good models of these strategies. Caerphilly County Borough Council, for example, produced an excellent resource for schools. In Australia, there are clear guidelines that schools can follow that look at all of the different components in their entirety relating to the provision of shade, the use of sunscreen, covering up delicate parts of the skin, the use of hats and so on. While we might not have the same levels of UV exposure as Australia, certainly, in the summer, we have enough sunlight and heat to do damage.

[44] **Lynne Neagle:** Do you know whether some schools have a policy of providing sunscreen for children or of applying it when children have come to school without it? Or is that something that never happens?

[45] **Dr Lewis:** As far as I am aware, no schools currently provide sunscreen. This is an important piece of work that needs to be done to inform this debate more fully. For example, we need to know the current provision for sun protection in Welsh schools. Could we audit all Welsh schools to see what provisions are already available? That would then inform what measures are needed across the country. Certainly, similar studies in England have found that at least two-thirds of schools do not have adequate shade for their children during periods of strong sunshine. So, we need to do a piece of work on that to see what provisions are available and then take that forward from there.

[46] **Angela Burns:** I am slightly staggered by your comments on not having much evidence, because yours is a respected organisation that has put forward a petition. I will quote your words:

[47] ‘We call upon the National Assembly to urge the Welsh Government to provide free sunscreen for all children under the age of 11 in Wales.’

[48] Yet I think that I just heard you say to my colleague that you do not know how many schools provide sunscreen.

[49] **Dr Lewis:** I do; the answer is none. No schools in Wales provide free sunscreen.

[50] **Angela Burns:** What about shade or any of the other requirements. I am slightly worried that you have come forward with what seems to be a good idea, but where is all the evidence?

[51] **Dr Lewis:** Currently, no schools provide free sunscreen. There are a number of schools in Wales that do not provide sun advice to the children in the school or provide guidance on sun safety. As I said, sunscreen use would only ever be one component of a sun safety strategy. However, it is probably one of the most prohibitive, as regards cost. There are cheap and easy things that we can do, such as giving advice and asking parents to provide appropriate clothing on warm days, when the UV index is high enough to cause damage. However, a piece of work needs to be done about all the other aspects of sun awareness.

[52] **Angela Burns:** Do you have a survey of the schools that you have spoken to about

this? Is there any evidence that you could submit to the committee? We would be very grateful for that.

[53] **Dr Lewis:** We have not done that piece of work, but we would love to.

[54] **Angela Burns:** I mean in relation to sunscreen and the fact that no schools are providing sunscreen.

[55] **Dr Lewis:** No, but I can certainly come back to you with that evidence.

[56] **Angela Burns:** Thank you, that would be lovely.

[57] **Lynne Neagle:** When you say that no schools are providing sunscreen, do you mean that they have a policy of not providing sunscreen? Do a lot of kids go to school plastered in sunscreen—as my own kids do—in the summer? Do you know of situations of schools having a policy of checking with the kids whether they have sunscreen on, and then keeping a little bit at hand for kids who have not had sunscreen applied? Do you know whether there is anything like that happening out there?

[58] **Dr Lewis:** I do not, but if that was happening, it would be done on an ad-hoc basis, in individual schools and, in many cases, by individual teachers.

[59] **Christine Chapman:** I am going to move on, because we have quite a lot to get through. I know that people want to come in, but we may have time later.

[60] **Aled Roberts:** Os yw'r Llywodraeth yn anfodlon dosbarthu canllawiau cenedlaethol, a oes mwy y gall y sector gwirfoddol ei wneud am y sefyllfa hon? Rwy'n llywodraethwr mewn ysgol, ac nid wyf yn ymwybodol bod unrhyw elusen wedi dod atom i ofyn beth sy'n digwydd yn ein hysgol, hyd yn oed o ran holi'r pennaeth. A oes camau inni eu cymryd cyn mynd at bolisi cenedlaethol o roi eli haul am ddim?

**Aled Roberts:** If the Government is unwilling to distribute national guidelines, can the voluntary sector do more about the situation? I am a school governor, and I am not aware of any charities coming to us to ask what is happening in our school, even from the point of view of asking the headteacher. Are there steps to be taken before we turn to a national policy of providing free sunscreen?

[61] **Dr Lewis:** Absolutely. These are issues that the voluntary sector is more than happy to help with. All the disease charities—particularly, in the field of cancer—are interested in prevention, rather than the consequences once people have developed a disease. I am pleased to see, from reading the other consultation responses, that Public Health Wales is developing skin cancer awareness web pages and guidelines. In the voluntary sector, we can provide interesting and innovative ways of getting those messages out to schools and public areas. We would be delighted to work with the Welsh Government, Public Health Wales and individual schools. The issue is that it might take a huge amount of resources to target all schools individually. There is a huge number of schools in Wales—there are well over 1,000 primary schools, for example. For us, it would be a resource issue. That is why we have developed the sun awareness packages online, as a free resource for schools. That is something that they can use and that we can provide for free, which gets those messages into the curriculum.

[62] **Aled Roberts:** Roeddech yn dweud bod y niferoedd sy'n dioddef o ganser y croen wedi dyblu. A oes digon o waith yn cael ei wneud ar hyn o bryd i nodi arwyddion canser y croen yn gynnar? Rwy'n synnu mai dim ond yn awr mae gwefan yn cael ei

**Aled Roberts:** You said that the number of skin cancer sufferers has doubled. Is enough work being done at present to identify the early signs of skin cancer? I am shocked that Public Health Wales is only now developing a website.



datblygu gan Iechyd Cyhoeddus Cymru.

[63] **Dr Lewis:** There is certainly a lot out there currently about the signs of skin cancer and catching it early in some information forms, such as websites and so on. As part of any sun awareness campaign, by showing the signs and symptoms of skin cancer, you can get a double whammy, where you show not only how someone can detect skin cancer earlier and, therefore, be much more effectively treated, but also show young children in particular what melanoma looks like and what its consequences are. By combining the prevention message with the early detection message, you can get lot of added value.

[64] **Aled Roberts:** On that point, I remember my son, when he was in primary school, coming home feeling sick because they had been shown a diseased lung. Given that they talk about cancers in that form, it would be appear to be quite a simple message to convey, if professionals visit schools, to say that there is a risk of skin cancer as well. It does not seem to be rocket science.

[65] **Dr Lewis:** I am sure that that is something that the voluntary sector would be more than happy to do. For us, as I said, to go round to do that to individual schools would be a resource issue, but schools can contact us and ask us to bring our ice cream van to the school to do a sun awareness event, for example.

[66] **Aled Roberts:** If there is already an organisation attending the school to talk about lung cancer—

[67] **Dr Lewis:** Absolutely; you could combine the two. It is part of the broader message for kids that the lifestyle choices that they make relating can affect their health later in life.

[68] **Angela Burns:** I was going to ask you about sun protection in schools, but you have covered that. I would like to ask some random questions. I was interested to read that, in Australia, which is obviously an incredibly hot and sunny country, there is no compulsory or statutory requirement for schools to have a sun screen policy. I would like to hear your comments on that. They do not do that in Australia, yet you would like us to consider it here.

[69] **Dr Lewis:** Australia has had the issue and addressed the issue of skin cancer for a much longer period of time than we have. It has become part of the culture there, because it is such a serious issue. In many ways, it has become just a part of their everyday life; it is part of the things that they do. In this country, we do not necessarily treat the sun with the respect that it is given in other countries. Mandatory guidance in schools would bring that to the fore much more quickly. There is guidance already out there, for example by the National Institute for Health and Clinical Excellence, which provides guidance for schools, but it is not taken up across the board. Making it mandatory would, therefore, remove the ad-hoc basis on which the sun message is being delivered. Australia is just a long way ahead of us on that, culturally.

[70] **Suzy Davies:** You say that guidance is not treated with respect. We have ‘Here Comes the Sun’, SunSmart, ‘Sun Protection and Schools: How to Make a Difference’, the Public Health Wales new guidelines and so on. What is not working about those? That is a hell of a lot of guidance.

[71] **Dr Lewis:** There is a lot of guidance out there. One comment made during the consultation was that, if you Google ‘sun awareness messaging’, for example, there is a lot out there. Yet, we still hear stories all the time of incredibly, mind-bogglingly unsafe practices. I will throw in an anecdotal example that I heard this week—excuse me for that. We visited a school this week, not as part of the sun awareness campaign, but as part of another activity, and one of my staff was talking to the welfare officer—who used to be known as the whipper-in—

[72] **Christine Chapman:** They are called education welfare officers.

9.45 a.m.

[73] **Dr Lewis:** They were called whippers-in in my day. She said that a large number of students were away from the school last year due to sunburn, because they had placed transfers on themselves and then purposely got sunburnt so that when they removed the transfer they were left with a negative tan. As I said, a study by the Teenage Cancer Trust last year showed that a third of school-age children will allow themselves to get sunburnt on purpose. So, while there is a lot of guidance out there, I think that we just need to be a lot cleverer about it. Are children reading websites? Probably not. They are probably on social media. Will they go looking for that information? Probably not, because children do not necessarily go hunting out things that they do not see will affect them until much later down the road. That is why using schools to get that message into the curriculum and to convey it through extra-curricular activities would probably be a really effective way of doing it. As Aled said, it is very simple in many ways: you show people what a malignant melanoma caused by damage from the sun or sun beds looks like, the ageing that the sun can cause and the damage that it can do to the underneath of your skin, and that can be really effective. We just need to be cleverer about the way in which we do that.

[74] **Jenny Rathbone:** I cannot understand why there is all this emphasis on sun lotion. Why can we not just put the emphasis on everyone having a hat? ‘The sun has got his hat on, he’s coming out today’—you cannot even get the song out of your head. Sun lotion is unbelievably expensive, but an age-appropriate hat, or a cool cap for secondary kids, is not. Why the emphasis on sun lotion?

[75] **Dr Lewis:** I agree. As I said, sun lotion is just one component of any sun-safe practice. A combination of hats, protective clothing and shade is the answer. Sun lotion is just one component of it. Unfortunately, it is probably the most prohibitive in terms of cost for many families. We did a piece of work with the Chartered Institute of Environmental Health last year and saw that if a family of four used the appropriate level of sunscreen—and did not just slap it on willy-nilly, but actually used the right amount—for a week’s holiday, it would probably cost them around £60. That is quite a sizeable chunk of money. Certainly, there are other things that you can do; I completely agree on that. However, I think that that is probably the most prohibitive for many individuals and families.

[76] **Christine Chapman:** Taking Jenny’s point about hats, I think that there are a lot of things going on here. Many young people do not think that it is cool to wear certain hats. You would have to wear quite a big hat, which would not be something that they would want to do, and even if you were to use the right amount of sun lotion, it could still probably be a bit risky in very hot sun, could it not?

[77] **Dr Lewis:** Yes.

[78] **Angela Burns:** I want to ask a few follow-on questions. First, do you have any evidence as to where young children tend to get burnt? Is it on the arms, the face, or is it pretty much distributed all over? Secondly, I was going to raise the issue of hats. Your petition refers specifically to children who are under 11 years of age. We all love our teenagers, but they are a law apart and they think that they are indestructible. We need to train children when they are very young so that, when they get to their teenage years, something kicks in that says, ‘I will not go and sit under that sunbed or do this or that’. So, we have to concentrate on the small ones. A school could purchase what I call a foreign legion hat, even if it is with the aid of an organisation, because when you look at something like the foundation phase, you very often go into schools now where they already have all their

outdoor gear. It is interchangeable. They have rows of wellington boots that everybody can use. You could do the same with the foreign legion hats, which would have to help a lot. The Australian view of ‘no hat, no play’ could easily be implemented at a fraction of the cost. We want to try to achieve good out of this. We want to try to ensure that we cut down on cancer incidence and that we educate children so that when they are those teenagers who think that they are indestructible, that message is already embedded in them. However, we have to be able to do it in a realistic way.

[79] I am searching for a little bit more evidence from you on some of the other opportunities, a bit more lateral thinking and a bit more about where the burns occur. If you were to turn around and say that most small primary-school children get burnt on their arms because they are always doing things, obviously a hat would not be suitable, and maybe then we would start talking about those lightweight Australian things that you can stick on them and other alternatives. Without wishing to sound negative or aggressive about this, your paper is pretty one-dimensional; I am just trying to get something out of it that we can usefully try to promote.

[80] **Dr Lewis:** Funnily enough, in looking at what they do in Australia, it was interesting to see that, originally, for ‘no hat, no play’ they used baseball-cap-type hats, but now they have said that it has to be the foreign legion hats. It is interesting they have taken that next step because they realised that the answer to your question is that kids tend to get burned on the back of the neck, and that kind of area that you do not really notice. It is particularly important for young children that you look at all these different approaches in their entirety.

[81] **Angela Burns:** If you had to make a choice, though, given that we have very little money, would you say that a hat would be better than nothing, but lotion is obviously the optimum solution?

[82] **Dr Lewis:** Having a research background, I would probably like to see a cost-benefit analysis of them both. It would be useful if we could do a piece of work that looked at cost-effectiveness and how well hats are tolerated by the kids compared to sunscreen, and therefore how effective they would be. You have the cost of the hats versus the cost of bulk-buying sunscreen. That is probably the work that we need to do to decide which would be most cost-effective.

[83] **Christine Chapman:** We have less than 10 minutes left, so I apologise to Members who want to come in, but I want to move on to some other areas. Jocelyn, did you want to come in here?

[84] **Jocelyn Davies:** It appears that if there is a problem with the general population, people believe that it is a case of saying, ‘I know how we’ll solve it—we’ll tell schools to do it’. So, instead of parents having the responsibility, schools will have it. You could say that school uniforms should compulsorily be long-sleeved, so that there are no bare arms, or that hats should be part of the school uniform—if you wanted it, you could say that. Do you think that the responsibility should be shared with parents, or are you finding it too hard to educate parents to protect their own children? Of course, there is a big difference between educating about the dangers of over-exposure and giving the school the responsibility to protect children from the sun. I would like to explore that a little further. Should it be part of the inspection regime? What responsibilities should teachers have if there is a trip that takes the children outside? Why take the responsibility away from families to protect their children from a disease that they may very well get as adults?

[85] **Dr Lewis:** It is obviously not an either/or situation. A lot of the awareness has to start in the home; there is only a certain amount of time that children are in school, of course. Obviously, a lot of that time is in the day time, and sometimes lunch time is when the sun is at

its strongest. However, there are also weekends and holidays, and six weeks off during the summer. I am not absolving parents of responsibility by any means. Certainly, parents have a huge role to play in this as well. However, in schools, we have an opportunity; we have children there to whom, through relatively simple measures, we could introduce elements of sun safety through the curriculum, as part of the wider activities around diet and other healthy living issues, just to highlight to them that the sun can be potentially dangerous. I would not say that this is taking responsibility away from the parents—they have a huge role to play.

[86] **Jocelyn Davies:** Why not just say that school uniforms have to have long sleeves, and include a hat, and instead of insisting that girls tie their hair up, they could just let it hang down to protect their necks? There are other ways of protecting the skin. All that I am asking is: why give the responsibility to the teacher to protect from the sun, instead of just educating about the sun? I am also interested in your attitude to taking children outside on school activities. If you put all the responsibility on the school for cleaning their teeth, introducing them to a healthy diet, protecting them from the sun, then what is left for the parent to do?

[87] **Dr Lewis:** Rather than viewing it as the removal of responsibilities, it should be seen as a really important opportunity to teach children about the consequences of their lifestyle behaviours for their health. We are talking more about using that opportunity to provide the information so that they are aware. Once the kids are aware, when they come home from school and they need help with their homework or they talk about what they have done that day, the message will then spread back into the home. You have to come at it from both ways.

[88] **Christine Chapman:** We will have the final question from Jenny, and then we will have to move on.

[89] **Jenny Rathbone:** Outdoor play is incredibly important to children's educational development. What I do not want to see is kids not being allowed to play because the sun is shining.

[90] **Dr Lewis:** Absolutely; I totally agree.

[91] **Jenny Rathbone:** What discussions have you had with schools about how to green their concrete playgrounds and how to provide shade, thereby making for a more interesting outdoor environment?

[92] **Dr Lewis:** Interesting research into this in the south-west showed that in school playgrounds where they have planted trees—specifically, in this research, but the same could be said of the provision of shade more broadly—the amount of outdoor play increased, but exposure to UV decreased. Certainly, we know that this cannot be seen in isolation. We have a situation in Wales in which obesity is on the rise, and there is an increase in sedentary behaviour. Also, we are fully aware of the issues to do with vitamin D deficiency. We do not in any way wish to be viewed as spoilsports, telling people to stay in and that the sun is something to be afraid of; we are just looking at how to enjoy the sunshine more safely. So, I totally agree that we do not want to give the message that outdoor play is something that is dangerous.

[93] **Jenny Rathbone:** Do you have a leaflet with cheap and cheerful ideas for headteachers?

[94] **Dr Lewis:** No, but our secondary school resource is all about that. It is about the provision of shade in your school and how you can develop shaded areas. Actually, part of it is going to be a competition to design a shaded area for your school, and you can win that design for your school or local committee area.

[95] **Christine Chapman:** We have a very final, very brief question from Keith Davies.

[96] **Keith Davies:** Rwy'n credu eich bod chi wedi mynd dros ben llestri yn hyn o beth. Mae eli haul, ond mae dulliau eraill o amddiffyn plant rhag yr haul. Rwyf am ddarllen hyn i chi, o Gyngor Dermatoleg Cymru: **Keith Davies:** I think that you have gone overboard in this regard. There is sunscreen, but there are other means of protecting children from the sun. I just want to read this out for you, from the Dermatology Council for Wales:

[97] 'we feel that providing free sunscreen would not be the best use of resources.'

[98] A ydych yn cytuno â hynny? Do you agree with that?

[99] **Dr Lewis:** I think that free sunscreen is an option as part of this holistic approach to sun safety. We would have to look at the cost-benefits of providing sunscreen. Clearly, I am aware of the fact that it does not come without a cost, but skin cancer in England costs around £240 million a year. If we extrapolate from that figure the number of people who get skin cancer in Wales as a proportion of the population, it would cost us around £14 million a year to treat and support them. So, the use of sunscreen as part of a broader sun safety policy for schools, with information more broadly for families and individuals, could be extremely cost-effective.

[100] **Lynne Neagle:** Very quickly, your petition talks about free sunscreen for all children, whereas many children are already protected very carefully by their parents. To what extent have you looked at the alternative of targeting help with these kinds of things at those families who are not sending their kids to school protected from the sun?

10.00 a.m.

[101] **Dr Lewis:** It is something that we have discussed, and we would love to discuss it with groups and organisations that provide support, particularly to those who are excluded from school or are not engaged in a school setting. There are other opportunities for providing sunscreen. As I said, sunscreen can be incredibly expensive. Is there a way of working with community health workers, for example, to identify groups or individuals who are not able to buy it and then provide it in that setting? We would have to do another piece of work to look at that.

[102] **Christine Chapman:** I will draw the session to a close. Thank you, Dr Ian Lewis, for your paper and for giving evidence this morning.

[103] **Dr Lewis:** It was a pleasure.

[104] **Christine Chapman:** There may be a few other questions that we need to ask, so, if you are happy, we will write to you and you can respond that way. Thank you, Ian, for attending this morning. We will send you a transcript of the meeting so that you can check it for factual accuracy. Thank you for attending.

[105] **Dr Lewis:** Lovely. Thank you.

10.01 a.m.

**Ymchwiliad i Bolisi ar Amddiffyn Plant rhag yr Haul mewn Ysgolion—  
Cymdeithas Llywodraeth Leol Cymru  
Inquiry into School Sun Protection Policy—Welsh Local Government  
Association**

[106] **Christine Chapman:** I invite the next witnesses to the table. They are from the Welsh Local Government Association. We have Dr Chris Llewelyn, the director of lifelong learning, leisure and information, and Daisy Seabourne, the lifelong learning policy team manager. Thank you both for attending this morning. Members have read your paper, so, if you are happy, we will go straight to questions. What importance do local authorities in Wales place on sun protection issues compared to other health and safety issues?

[107] **Ms Seabourne:** It is covered as part of the general health and safety policies in schools. I think it varies slightly from authority to authority who actually has responsibility for that. However, by and large, local authority health and safety in schools officers will work with schools. It is part of their policies to cover sun protection. You may also be aware from the paper that we provided that it is part of the Welsh healthy network of schools scheme. Each school, if it is part of that scheme, has to be aware of sun protection issues. As far as I am aware, the vast majority of primary schools are part of that scheme, and every local authority in Wales is part of that scheme. As far as we can be, we are sure that local authorities and schools are aware of sun protection issues.

[108] **Christine Chapman:** Have you carried out an audit of individual schools?

[109] **Ms Seabourne:** Not on this issue, no.

[110] **Christine Chapman:** How much priority would you say individual local authorities give to the specific need for sun protection policies?

[111] **Ms Seabourne:** With regard to providing a healthy environment for children within a school setting, local authorities would see this as a very important issue.

[112] **Christine Chapman:** We heard evidence from a previous witness about young people putting transfers on and deliberately going out to get sunburnt. You could argue that that is an issue for parents, but that is very worrying evidence. Do you have a comment on that?

[113] **Ms Seabourne:** I have not heard about that as an issue before so I could not comment on it, but, obviously, that is an extremely worrying development. However, I would definitely see that as being a parental responsibility—as well as the school's responsibility, if it is happening in a school setting, certainly.

[114] **Julie Morgan:** Do you think that there is sufficient guidance for schools?

[115] **Ms Seabourne:** I have had a look at the SunSmart guidance on the Assembly Government's website. It seems to be an extremely sensible way to go. As we said in our paper, if, through the evidence it collects today, the committee feels that there is a lack of awareness in schools, we will be happy to work with the Welsh Government to ensure that we can raise awareness even further. However, as far as we are aware, there is sufficient awareness of policies and guidance.

[116] **Dr Llewelyn:** It is one of those issues on which there could always be more guidance, more prescription and greater focus on raising awareness. It is an issue of proportionality in the sense of when you think that the resource and effort going in are

proportionate to the risk. This type of discussion is important and valid. As was revealed in the previous evidence session and in other evidence that has been provided, there is scope for further discussion and monitoring of exactly what the situation is.

[117] **Julie Morgan:** So, your view is that there is more that should be done.

[118] **Dr Llewelyn:** Potentially. The potential is always there, but it is a case of weighing up the perception and the reality of the risk and treading and progressing carefully on it.

[119] **Ms Seabourne:** On the point that was mentioned in the previous session about governors, there is probably a piece of work that we could do there with Governors Wales, for example, to raise awareness among governors about the issue. That could also be a possible area for monitoring sun protection policies in schools, through the work that governors do in their annual reports about what goes on in a school. That is definitely an area that we could look at.

[120] **Julie Morgan:** Do you think that sun protection policies should be compulsory for schools, or put on a statutory basis?

[121] **Ms Seabourne:** This is a difficult one. You could run into a few issues with making it compulsory. There are a couple of points around that. First, the SunSmart guidance says that the sun protection policies work best when they are developed as a school. So, a school sits down, works with the parents and develops a sun protection policy that works for that school. If you set up a compulsory sun protection policy that is quite specific about what it must include, I think that you would move away from that. However, if you have something that says that schools have to have a sun protection policy built with the school, then that is a different thing. The other issue with that is what you put in that policy. Obviously, the main focus of this discussion is around sunscreen. I think that there are quite a few issues if you make the use of sunscreen compulsory and free of charge in a school. Then, you come across more significant and difficult issues, which you need to overcome.

[122] **Julie Morgan:** So, you are saying that it could be compulsory to have a policy but that the policy should be worked out by the individual school.

[123] **Ms Seabourne:** Yes, absolutely, with the parents and the children together.

[124] **Jocelyn Davies:** I have a supplementary question on that. The evidence that we received in the previous session was that the guidance at the minute was far too passive.

[125] **Ms Seabourne:** I do not know whether you have had a look at the SunSmart guidance. I have spoken to a few local authorities, and it seems quite a sensible approach. All that the guidance does, really, is give the schools some hints and quite a lot of detail about how to develop a policy that is appropriate for that school. You have talked already today about the amount of shade, for example, that is within a school. That would have an impact on what you put in a policy. It would be different for each school. Also, the ethnic mix in a school would perhaps have an impact on what you put in a policy, so I think it would be difficult to have something that is very specific. In fact, if you have something that is flexible and that provides you with good guidance as to how you develop a policy, then that is much more useful than having a very strict set of policies.

[126] **Jocelyn Davies:** When we were discussing best practice with our last witness, he just named one local authority in Wales and then talked about Australia. So, what role is the WLGA playing in spreading good practice?

[127] **Ms Seabourne:** We are certainly happy to work with the Welsh Government to

spread good practice. Was it Caerphilly that was mentioned?

[128] **Jocelyn Davies:** Yes.

[129] **Ms Seabourne:** Caerphilly has developed a policy and works with its schools. However, it is dependent on the voluntary buy-in from each individual school. I have also identified some good practice in Newport. However, as I said in the paper, we are more than happy to work with the Welsh Government to spread examples of good practice, if they are out there.

[130] **Aled Roberts:** Rwy'n llywodraethwr mewn dwy ysgol ac rwy'n meddwl ein bod wedi symud ymlaen o sôn am eli haul at weld beth yn union yw'r polisiau mewn ysgolion ac awdurdodau lleol. Yr hyn sy'n fy synnu yw eich bod wedi dweud bod polisi amddiffyn plant rhag yr haul yn rhan o'r polisi iechyd a diogelwch. Bob blwyddyn, mae'r awdurdod lleol yn cynnal archwiliad o bolisiau ym mhob ysgol. Derbyniais lythyr gan fy nghyngor lleol yr wythnos diwethaf gan mai fy yw cadeirydd y llywodraethwyr. Nid wyf yn ymwybodol bod yr archwilydd yn edrych i weld a oes gan yr ysgol bolisi. Mae ganddynt restr ac maent yn gofyn a oes gennym bolisi ar godi ffioedd am rentu ystafelloedd ac yn y blaen. Felly, mae'n eithaf hawdd inni weld a yw'r ysgol wedi trafod beth yw ei pholisi ar amddiffyn plant rhag yr haul.

**Aled Roberts:** I am a governor in two schools and I think that we have moved on from talking about sunscreen to seeing what exactly the policies are in schools and local authorities. What surprises me is that you have said that sun protection policy is part of the health and safety policy. Every year, the local authority will conduct an audit of policies in all schools. I received a letter from my local council last week in my role as chair of governors. I am not aware that the auditor checks whether the school has a policy. They have a list and ask whether we have a policy on charging for renting rooms and so on. Therefore, it is quite easy for us to see whether the school has discussed what its policy is on sun protection.

[131] **Ms Seabourne:** As Chris has already said, there is a job to be done in raising awareness of policies. However, as I said, it is not just addressed through the health and safety policies in a school, but also through the network of healthy schools. It probably needs to be brought together a little more in schools. We are more than happy to work with the Welsh Government to ensure that that is more consistent across Wales. It is not an issue that the WLGA has looked at previously, but we are more than happy to do a bit of work on that with the Welsh Government.

[132] **Dr Llewelyn:** Having looked at the evidence, it seems that there would be some benefit in a more joined-up and co-ordinated approach, focusing on raising awareness and looking at where best practice is and at the characteristics and the futures of that good practice, seeing how easily and quickly that could be spread, monitoring progress and looking at the problems that are identified.

[133] **Suzy Davies:** Developing that point, you have both said that there is still scope for additional awareness raising. Do you think that that is a matter for the Welsh Government and local government, bearing in mind your comments on proportionality, or should we be looking to other organisations to provide that? My second question, related to that, is on what you have said about sharing best practice. We also heard that sunscreen is not provided by schools. So, best practice, presumably, at the moment, is not to provide sunscreen.

[134] **Dr Llewelyn:** On the first part of the question, there is shared or collective responsibility on this issue. Providing guidance at a strategic level is always advantageous. However, there is a balance between providing strategic direction in policy terms and



allowing enough scope for interpretation at a local school level. As has been highlighted in the other evidence, there is a balance between the responsibility of the family, parents and guardians, and that of the school, the authorities, the governing bodies and so on. It is an issue of shared responsibility, but with a focus on the delivery side.

[135] **Ms Seabourne:** On the issue of a proportionate response, I would like to see it being delivered through existing mechanisms. I have mentioned the Welsh network of healthy schools—I have gone on about that a bit—but that would seem to be the most appropriate way to target that, because it is already in existence and it already has relationships with schools. It is based in Welsh Government, and the funding goes to schools. We could do a little work with it and Public Health Wales, for example, so that we look at working with existing mechanisms rather than creating something new, which could potentially be more costly.

[136] On what is best practice now and the sunscreen issue, as far as I am aware—obviously I have not spoken to every school in Wales—schools do not provide free sunscreen on a consistent basis. For example, a lot of schools send a letter to parents at the beginning of the sunny weather period saying, ‘Can you please make sure that your child is adequately protected through clothing and broad-spectrum sunscreen that lasts all day?’ However, as far as I am aware, on an ad-hoc basis—it is not written down in policy—if kids forget, schools step in and do appropriate stuff, which is what we would like to see. I did a very rough calculation of what it might potentially cost schools in the primary sector to provide sunscreen. You could be looking at about £2,500 a year per primary school, which is a significant part of their budgets. That is £3.4 million across Wales. That is a very rough estimate; we would have to do a lot more work to determine exactly what the cost would be. That was based on a bottle of children’s sunscreen that costs about £5.

[137] **Suzy Davies:** Bearing in mind that some of the written evidence that we have had says that one of the reasons why teachers do not like to be involved in this is because of potential allergies, how can making sunscreen free in schools resolve parents’ and teachers’ concerns about spreading a problem?

10.15 a.m.

[138] **Ms Seabourne:** I do not think that it can. There are a lot of issues around providing free sunscreen: there is the allergy issue, child protection issues, vitamin D absorption issues, training for teachers around when it is appropriate to apply sunscreen. There is also potentially a workload issue for teachers—if you have a class of 30 kids and one teacher, it will take you a bit of time to get that done, and the teacher will need training and guidance. There are a whole load of issues around sunscreen.

[139] **Jenny Rathbone:** Why is there an issue with putting sunscreen on a child’s face and arms in the presence of other adults?

[140] **Ms Seabourne:** I personally do not think that it would be an issue. That is certainly something that could be overcome. Every school has a child protection policy and teachers who are responsible for child protection. It has been brought up as an issue with me by local authorities.

[141] **Jenny Rathbone:** Which ones?

[142] **Jocelyn Davies:** Do you mean that the issue is putting sun cream on children’s legs or chest?

[143] **Julie Morgan:** On the issue of allergies—[Inaudible.]

[144] **Ms Seabourne:** Yes, I agree, but if you have a policy that says that sunscreen is compulsory, then you would have to put all the checks in place. I do not think that any of these issues are insurmountable if you want to recommend that as a policy; it would just have to be taken into consideration—different types of sunscreen for different allergies, parental consent and all those types of things. I do not think that any of it cannot be overcome—it is just that there are considerations that you would have to look at.

[145] **Julie Morgan:** I am not saying that it should not be the policy, but sometimes these things are put up to make it more difficult. As always, these things will stop you from doing anything.

[146] **Ms Seabourne:** Absolutely agreed. You would have to have policies that would cover them, and look at all the permutations of what could happen if this were to be done in schools.

[147] **Julie Morgan:** Moving on to school building design, there are obviously other ways of helping to prevent sunburn. Have you made any assessment, or do you know of any assessment, of the cost surrounding the provision of shaded areas in existing school buildings, particularly older ones, since the introduction of the foundation phase? Certainly, the older schools in my area that I visit have shaded areas for the purposes of the foundation phase, and I just wondered if you knew how much that had cost.

[148] **Ms Seabourne:** I have not done a specific assessment of how much that costs to produce. A capital grant was provided by the Welsh Government when we implemented the foundation phase to put that in place. Off the top of my head, I think that it was £3 million a year; it was a significant amount.

[149] **Dr Llewelyn:** We can find out quite easily.

[150] **Julie Morgan:** In my area, it is almost universal—there is shade for little children everywhere. So, if we had an estimate of the cost of that, that would help in looking at it more widely.

[151] **Ms Seabourne:** Estyn has done a recent inspection of how local authorities are doing in implementing the foundation phase, and overall, it was reasonably pleased with the provision of outdoor areas. We could also do some work around the twenty-first century schools programme, which is the capital build programme that involved the WLGA and the Welsh Government working together on a survey of every school building in Wales. That covered things like outdoor areas as well, so we could potentially look at what schools have done in terms of the provision of shade.

[152] **Dr Llewelyn:** There is some scope to build that into the twenty-first century schools programme as it is rolled out. It should be relatively easy to look at the school building survey; it is very comprehensive, and this is the first time that we have had this kind of information available to us. We could also look at contemporary practice in school design, and how it is currently built into the system, and make some kind of cost assessment. There is quite a bit of scope in relation to the twenty-first century schools programme.

[153] **Julie Morgan:** It would be useful to get that information, Chair.

[154] **Christine Chapman:** Yes. Could you provide that?

[155] **Ms Seabourne:** Yes. As the witness from Tenovus mentioned, another issue is more sustainable outdoor areas with trees, and those kinds of things. We did some work with an

organisation called Learning through Landscapes to provide advice and guidance to local authorities on how you design outdoor areas, which would include things like trees and would, therefore, mean a more long-term basis, as opposed to the built structures.

[156] **Julie Morgan:** Certainly, the schools that I see are doing that. However, I do not know how widely it is done, particularly in older schools where they have a bare yard.

[157] **Ms Seabourne:** Most schools in Wales are looking at that currently through the twenty-first century schools programme. There are a number of new builds, but a lot of schools are looking at refurbishment of existing facilities.

[158] **Julie Morgan:** Is that universal?

[159] **Ms Seabourne:** I could not say that every school in Wales is doing it, but every local authority has a capital programme that looks at school buildings.

[160] **Aled Roberts:** I ddilyn y pwynt hwnnw, yn Wrecsam, pedair ysgol yn unig fydd yn cael eu hariannu yn rhan gyntaf rhaglen ysgolion yr unfed ganrif ar hugain. A ydych chi felly'n dweud nad yw amddiffyn plant rhag yr haul yn rhan o ganllawiau'r rhaglen?  
**Aled Roberts:** To follow on from that point, in Wrexham, only four schools will be funded in the first tranche of the twenty-first century schools programme. Are you therefore saying that protecting children from the sun is not within the programme's guidelines?

[161] **Ms Seabourne:** As far as I am aware, there is nothing that specifically mentions sun protection, but outdoor areas and the built landscape are mentioned. We are currently in the transition phase between the old school buildings improvement grant programme and the new twenty-first century schools programme, which is starting in 2014-15. So, there is certainly scope within that programme to look at what schools will be doing.

[162] There is no specific mention of sun protection on a strategic basis, but I do not see why we could not look at what local authorities can do on an individual project basis. This is in addition to what has happened already as part of the foundation phase—we are primarily talking about the primary sector, although the secondary sector is also important—given that primary schools already have provision in terms of outdoor play areas for children.

[163] **Aled Roberts:** So, if schools decide to receive funding from outside of the county's own resources—outside of twenty-first century schools—there is no guidance that would factor in sun protection policies. Is that the case?

[164] **Ms Seabourne:** There is no specific guidance, but I would be surprised if it was not part of the foundation phase guidance. I can look to see whether it is covered in that. We have done a piece of work with Learning through Landscapes that looks at the planting of trees and at ensuring that there are sufficient outdoor areas. I am fairly sure, although I would have to check, that sun protection is covered within that.

[165] **Dr Llewelyn:** It should be possible to build that into the twenty-first century schools standard.

[166] **Aled Roberts:** Mae'r ysgol rwyf yn gadeirydd y llywodraethwyr arni yn bedair oed—mae'n ysgol newydd sbon—ac nid oedd man cysgodol o gwbl ar gyfer y cyfnod sylfaen; y gymdeithas rhieni ac athrawon a dalodd am y cysgod sydd bellach ar gael.  
**Aled Roberts:** The school for which I am chair of governors is four years old—it is a completely new school—and there was no shade at all for the purposes of the foundation phase; it was the parent teacher association that paid for the shaded area that is now

Mae'r sefyllfa honno wedi gwella, a gwn fod man cysgodol yn cael ei gynllunio ar gyfer pob ysgol bellach. Rwyf yn sôn am un awdurdod penodol, ond beth ydych yn ei wneud ynghylch rhannu arfer da, oherwydd, dro ar ôl tro, gwelwn fod arfer da mewn awdurdod, ond hwyrach bod y sefyllfa'n hollol wahanol mewn un arall?

[167] **Keith Davies:** Rwy'n cytuno ag Aled. Rydym wedi gweld nifer o ysgolion cynradd newydd yn cael eu hadeiladu, ac rwyf wedi ymweld â nifer ohonynt, ond nid wyf wedi gweld y manau cysgodol hyn yn cael eu hadeiladu i blant yn y cyfnod sylfaen.

[168] **Dr Llewelyn:** Ni allaf wneud sylw o ran ysgolion unigol. Rwy'n synnu, o ran cynllunio ar gyfer y cyfnod sylfaen, nad ystyriwyd rhai o'r elfennau hynny. O ran rhannu arfer da o safbwynt y cyfnod sylfaen, nid wyf yn hollol siŵr beth yw'r sefyllfa, ond gallwn edrych ar hynny a dod yn ôl at y pwyllgor. Mae'n bendant yn bwynt dilys i'w godi.

[169] **Lynne Neagle:** Most of my questions have been covered, but I want to return to what Daisy said about some schools already providing sunscreen. Could you say a little more about the mechanics of that—how it works and how widespread it is? Presumably, that relies on a teacher asking the class who does not have any sunscreen on. Is that in some of the schools' policies or is it extremely ad hoc?

[170] **Ms Seabourne:** As far as I am aware, this is completely anecdotal evidence. I have spoken to some local authorities to find out what they do and, by and large, they work with parents to ensure that children come into school appropriately dressed—for example, not in strappy tops and that sort of thing when it is sunny. So, whether teachers check before kids go outside that they have sunscreen on and have hats is ad hoc. There may be some provision within a school, but it is not a written policy. There are other things in terms of children who have some additional learning needs, in that they will perhaps provide a little support for them on sun protection, but as far as I am aware, it is not written policy that they should provide sunscreen within the school.

[171] **Lynne Neagle:** Would it be helpful if guidance on that was reinforced and if provision was made? It is a lot of expense, and we do not want to spend money on kids who already have sunscreen on, but would it be helpful if some provision was made for children who are coming to school regularly without sunscreen?

[172] **Ms Seabourne:** If a school is sending home a letter with a child to say that they need sufficient sun protection for school, and that happens regularly, then that is an issue for a school representative to sit down with a parent and have a discussion about it with them. As I said previously, if you are talking about the compulsory use of sunscreen in school, that is one thing, but a policy is another. You will run into a few issues if you say that sunscreen is provided for everyone in a school.

available. That situation has improved, and I know that a shaded area is now planned for every school. I am talking about one particular authority, but what are you doing about sharing good practice, because time and again we see that there is good practice in one authority, but the position could be quite the opposite in another?

**Keith Davies:** I agree with Aled. We have seen a number of new primary schools built, and I have visited many of them, but I have not seen these shaded areas being built for children in the foundation phase.

**Dr Llewelyn:** I cannot comment in relation to individual schools. I am surprised that, in planning for the foundation phase, some of those elements had not been taken into account. In terms of sharing good practice related to the foundation phase, I am not exactly sure what the situation is, but we could look into that and come back to the committee. It is certainly a valid point to raise.

[173] **Lynne Neagle:** Do you think that there is any conflict between the emphasis that Tenovus has put on sunscreen and the other public health messages that we are trying to get out about the sun? For example, we seem to be advised to stay out of the sun between 11 a.m. and 3 p.m.. Will kids risk damaging themselves in other ways? For example, it is not good for your eyes, is it, to be in the full glare of the sun? Do you feel that there is any public health conflict between putting so much emphasis on sunscreen and other measures?

[174] **Ms Seabourne:** The representative from Tenovus said that it should be part of a whole policy. Sunscreen is one bit, and it is perfectly legitimate to look at that. I would not send my child to school without any sunscreen on, but then, I would not send her out without a hat on either, if you see what I mean. It is part of the policy. I firmly believe that the best way is for a school to develop a policy that is appropriate for that school, and sunscreen could be part of that.

[175] **Dr Llewelyn:** I looked at the written evidence and it talked about sunscreen in the context of a comprehensive whole-school approach that is co-ordinated and monitored. That is probably the way to look at it and to look at the wider issue. A starting point would be to look at where good practice has been identified and at the characteristics of that good practice to see what can be extracted from that and shared more widely, so that, gradually, a more co-ordinated, joined-up approach is built.

[176] **Christine Chapman:** This might be repeating what others have said, but it strikes me that there are checklists in place, which may be guidance as opposed to being statutory, but there is obviously inconsistency across schools. There seem to be mixed messages about whether it is the parents' responsibility or the teachers' and the school's. When you have such mixed messages, it is likely that there will be huge gaps in the system to the detriment of young people who may then be at risk. Would you agree that it is pretty inconsistent at the moment?

[177] **Ms Seabourne:** Its nature, because it is not a compulsory part of what a school has to do, will make it inconsistent, but I do not necessarily think that that is a negative thing in all cases. As was previously said, each school needs an appropriate policy, so there will be variations between schools. However, I agree with Chris; I do not think that there is any harm in looking at what we can learn from schools and ensuring that the messages are getting out there consistently. It is entirely reasonable for parents to think that their children should be safe and protected during the school day.

[178] **Christine Chapman:** Thank you for attending this morning. We will send you a transcript of the meeting to check it for factual accuracy. The committee will take a short break before the next session.

*Gohiriwyd y cyfarfod rhwng 10.29 a.m. a 10.43 a.m.  
The meeting adjourned between 10.29 a.m. and 10.43 a.m.*

**Ymchwiliad i Bolisi ar Amddiffyn Plant Rhag yr Haul mewn Ysgolion—  
Cymdeithas Arweinwyr Ysgolion a Cholegau Cymru a Chymdeithas  
Genedlaethol y Prifathrawon Cymru  
Inquiry into School Sun Protection Policy—Association of School and College  
Leaders Cymru and National Association of Head Teachers Cymru**

[179] **Christine Chapman:** We will now continue with our inquiry into sun protection policy. We have witnesses from the Association of School and College Leaders Cymru and the National Association of Head Teachers Cymru. I welcome the witnesses. Will you introduce yourselves for the record, please?

[180] **Ms Brychan:** Anna Brychan, **Ms Brychan:** Anna Brychan, director of cyfarwyddwr NAHT Cymru. NAHT Cymru.

[181] **Mr Jones:** Gareth Jones, Secretary of ASCL Cymru.

[182] **Mr Murphy:** Graham Murphy, president of NAHT Cymru and Headteacher of Archbishop Rowan Williams Voluntary Aided Church in Wales Primary School.

[183] **Christine Chapman:** Welcome to you all, and thank you for attending today. Members will have read your paper very carefully, so if you are happy, we will go straight to questions and have a good discussion. I will start. Is there any evidence of increasing parental concern and awareness of the need for sun protection for children?

[184] **Mr Murphy:** I have been chatting to, or have carried out a survey of, 10 schools in Monmouthshire, and there has not been a single recorded concern about suncreening. Any issues that have been looked at have been to do with activities and children, rather than sunscreening.

10.45 a.m.

[185] With regard to incidents being recorded in schools, within the 10 schools there has not been a single recorded incident of sunscreen being required. There have been cases of parents asking whether sunscreen could be applied for particular activities, but not because of activities related to the way the school day would run.

[186] **Jocelyn Davies:** Over what period was that? You are not just talking about this year, from the end of December until now, are you?

[187] **Mr Murphy:** No, indeed, it was over a significantly longer period. Before this, I worked as a technical officer for beaches and lifeguarding for the United Kingdom. We looked at sunscreen in particular, and we did a great deal of work with Tenovus. I was chairman for 25 years with regard to beaches and sunscreen. A proactive approach had to be taken. It was necessary because of the types of activities. There is not the same situation in schools, and particularly in primary schools, because of the very limited periods of time young children will be exposed to the sun. In our schools, we are probably talking about a period of 30 minutes at lunchtime and 10 to 15 minutes at playtime. That is not at all significant. With regard to sports days and events, it is not the same situation as when you were at school. Gone are the days when you would have people waiting for ages and then there would be one event. Nowadays, there are multiple events at a time with lots of children taking part, and everything is finished within an hour. That is the longest period of time for sports activities or exposure to sun for these children.

[188] **Julie Morgan:** Surely, 30 minutes in the sun at midday would be a danger to children.

[189] **Mr Murphy:** Indeed, it would be. Again, it is a case of calling upon the practices in schools. Risk assessments are required, whether for playtime or for activities related to school educational visits. The practice in schools would be to ensure that children and parents are regularly informed of the need for this and what procedures would be in place if there was extremely sunny weather. You are right that you need to be aware of that. It would be a call made on the day.

[190] **Ms Brychan:** It is also worth mentioning that, when we received the invitation to give evidence, we canvassed our members' opinions and wrote to all of our branch officials

asking them specifically whether this is a problem that parents raise with them, and they said that it was not. When there are issues to do with the use of sun cream, they hit the headlines, but there are very few and, generally speaking, among all the issues that parents raise with schools, this did not really feature.

[191] **Mr Jones:** To add to what Graham just said, it is well established in law—I am not a lawyer, but this is my understanding—that headteachers are in loco parentis. They take on the role of the parent and, as such, have a responsibility to exercise a duty of care. As far as my experience over many years goes, I do not know of a headteacher who has not exercised that duty of care very carefully. That is not just with regard to sunshine, but whether the weather is too hot, too cold or too wet. There is perhaps an issue that, sometimes, the risk assessment guidance needs to specify that a risk assessment should be carried out for environmental factors. That is perhaps an area where we have moved on.

[192] **Angela Burns:** That sort of leads me to my question, because you talked about sunny days. Given your background, could you give us some technical advice about this? The danger comes from certain types of rays, which are sometimes present when it is not so sunny. Is that not correct?

[193] **Mr Murphy:** Indeed.

[194] **Angela Burns:** How do you measure it? How can a schoolteacher, looking out of the window, know that it is a UV day and make a decision? Is there anything easy that could be put into the school, like some version of a thermometer?

[195] **Mr Murphy:** If you are working with beaches and the like, there are warnings that would go out as part of the process, but with schools, the answer is ‘no’, other than using common sense. If it feels hot and oppressive, or the children or staff are uncomfortable, obviously it is not right to undertake outdoor activities for any length of time.

[196] **Angela Burns:** So, there is a direct correlation—hot equals UV. I thought that you could get UV when it is not so hot.

[197] **Mr Murphy:** You are right. It is not necessarily when it is hot, as we are finding out at this time of the year. We have had some very nice days, and they could cause problems. Again, it is a common-sense call on the staff to make sure that children are wearing the appropriate clothing. A big part of education nowadays, as you are all aware, is the opportunity for outdoor learning. That needs to be encouraged among our children. The thing with that, of course, is that you have to make sure that the children are properly prepared, whether that is for cold days, as Gareth mentioned, or days when the ultraviolet rays are causing problems. Part of the process in schools, and the awareness for schools, is to make sure that they have put into practice the appropriate measures—it is about the types of hats that they would wear, for instance; peaked caps are no good by themselves, so you need more than that. The message needs to be consistent across schools. That is a challenge, but it has not been borne out by any evidence. It is only what would happen through common sense.

[198] **Angela Burns:** Just to quickly flip that on its head, do you have any evidence from your organisations as to the effect of a lack of vitamin D on children? I read some evidence that things like rickets are coming back, and I just wondered whether anything had appeared on your desk.

[199] **Mr Jones:** I have not seen anything of that nature, but then again, I have not looked for it either.

[200] **Ms Brychan:** It was not part of the responses that we had, but there have been recent

reports to suggest that we might go too far in the other direction in an attempt to solve one problem, thereby creating a whole series of other ones.

[201] **Julie Morgan:** Is the guidance under the SunSmart campaign sufficient? Obviously, that is supported by the Welsh Government.

[202] **Mr Jones:** As far as I am aware, the feedback from members is that, yes, it is sufficient. It is used, along with all the other guidance that schools receive. I have not seen any evidence that would suggest otherwise. I know that one or two of the others who have contributed to this inquiry have made some suggestions as to whether the guidance is adhered to by all schools, but I have not seen any evidence of it being neglected. That is all that I can say on that.

[203] **Julie Morgan:** You cannot give any more evidence about whether it is used.

[204] **Mr Jones:** No, but I will repeat that headteachers have a legal duty of care and are very aware of that, and therefore take on board all risks that young people face. Therefore they will have regard to all guidance that is available.

[205] **Julie Morgan:** I accept that absolutely, but in terms of this guidance, I was just trying to get some information about whether the guidance appeared to headteachers to be sufficient and helpful. Do you have any feedback?

[206] **Mr Jones:** As far as I am aware, it is helpful, and it is used.

[207] **Ms Brychan:** That is the information that we have as well—they are aware of the guidance and apply it alongside all the other guidance and risk assessments that they employ. We were interested in what Tenovus was saying about the increase in cases that has led to this petition, and about its concern. However, essentially, the position of our members in looking at this in their schools was that, yes, the guidance is sufficient and useful for where we are now, but if this is going to be a growing concern over coming years, we do not think that the solution that was suggested with sunscreen is the best way to address it. Looking at it in the context of the risk assessments, the environmental issues that Gareth mentioned earlier, or perhaps guidance to parents or general guidance on proper clothing being worn in schools, those kinds of things might be a better way of addressing the problem that Tenovus says is a growing one, rather than looking at the application of sunscreen. There certainly does not seem to be a feeling that, in that regard, the guidance that we have now is insufficient.

[208] **Julie Morgan:** I am sorry, Graham; would you like to add something? I have another question.

[209] **Mr Murphy:** I would just like to say that, as part of the campaign, certainly for the last several years, there has been advice on the dangers of the sun's rays, or for that matter, of ultraviolet rays, and what they can do. That is given to schools anyway, despite the fact that the people responsible, regardless of who they are in the school, have a responsibility for the children; so, that works well. Interestingly, under the wellbeing agenda, it is something that Estyn has not picked up on yet as being a concern, which is very interesting. However, there may be an opportunity here to make it something that is very positive from our forum, and that is the role that the local authorities can and should be playing in working with schools to ensure that the messages are passed on so that a key and constant message is being relayed to schools. In that way, there would then be a constant message across Wales, and there would not just be one particular group within one authority that is involved with care and protection and may do more. Everyone that I have spoken to for the survey that I carried out was aware of the SunSmart scheme.



[210] **Christine Chapman:** Estyn is coming in next week, so that might be a useful question to ask at that time.

[211] **Mr Murphy:** I would say that it is an opportunity.

[212] **Julie Morgan:** This is guidance—and I am not talking about any specific aspect of it, but the general policy. Do you think that it should be compulsory for there to be a school sun protection policy? I am not saying what the policy should be, but asking whether there should be a policy.

[213] **Mr Murphy:** Health and safety, in any measure, has to be a part of what headteachers and governors are ultimately responsible for. So, yes, any aspect of safety advice and health and safety has to be considered.

[214] **Mr Jones:** The health and safety policy already has to exist. Therefore, the guidance with regard to sun protection is already a part of that policy.

[215] **Julie Morgan:** Are you saying that that is compulsory?

[216] **Mr Jones:** It is required that schools have a health and safety policy.

[217] **Julie Morgan:** Does that include a school sun protection policy?

[218] **Mr Jones:** I am saying that it should be encompassed within it. I do not know whether, in all cases, it is built into it.

[219] **Julie Morgan:** However, you think that it should be there.

[220] **Mr Jones:** It would not do any harm, but I would suggest that it should—

[221] **Julie Morgan:** It might do some good.

[222] **Mr Jones:** I would suggest that it should relate to all environmental factors, and not just the sun, because there are risks from extreme cold and in children arriving at school without a suitable outdoor coat.

[223] **Julie Morgan:** Yes, absolutely.

[224] **Mr Jones:** There is an issue, perhaps—and we have already made this point—with regard to the balance between a school's responsibility and parental responsibility.

[225] **Julie Morgan:** We will probably discuss that at some point.

[226] **Mr Jones:** I thought that we might.

[227] **Aled Roberts:** A ydych yn derbyn tystiolaeth Tenovus? Dim ond un esiampl a roddwyd i'r pwyllgor y bore yma o awdurdod lleol yn cyflwyno polisi yn ei ardal, sef Caerffili. Nid oedd y tyst o Tenovus yn gallu rhoi unrhyw enghraifft arall. I ddilyn pwynt Julie, sut ydym i wybod os yw polisi iechyd a diogelwch ysgol yn cynnwys polisi diogelwch rhag yr haul, oherwydd, ar hyn o bryd, nid yw'n cael ei fonitro? Nid yw Estyn

**Aled Roberts:** Do you accept the evidence given by Tenovus? Only one example was given to the committee this morning of a local authority that had introduced a policy in its area, namely Caerphilly. The witness from Tenovus was unable to give any other example. To take Julie's point, how are we to know whether a school's health and safety policy includes a policy on sun protection, because, at present, this is not being

yn monitro hynny ac nid yw'n cael ei fonitro pan fydd ysgol yn cael archwiliad gan adran addysg yr awdurdod lleol. Rwy'n ymwybodol bod rhestr y mae awdurdodau lleol yn ei defnyddio o'r polisiau a ddylai fod ar gael ym mhob ysgol, ond nid wyf yn ymwybodol, fel cadeirydd corff llywodraethu, fod polisi diogelwch rhag yr haul ar y rhestr honno.

[228] **Simon Thomas:** Dyna'r cwestiwn roeddwn i yn mynd i'w ofyn.

monitored? Estyn does not monitor that and it is not monitored when a school is inspected by the local authority's education department. I know that there is a list that local authorities use of particular policies that should be in place, but I am not aware, as the chairman of a governing body, that a sun protection policy is on that list.

**Simon Thomas:** That is the question that I was going to ask.

11.00 a.m.

[229] **Mr Jones:** I suspect that you are right that a specific policy with regard to sun is not on the list of required policies. I doubt that it is currently specified as being one of the health and safety policies either.

[230] **Aled Roberts:** I am not suggesting it should be a specific policy, but we have no means at the moment—

[231] **Mr Jones:** No, but this is why several of us have mentioned Estyn's involvement with regard to wellbeing. Wellbeing is part of the inspection framework, and perhaps there could be a monitoring approach. We would have some concerns if it started becoming an extra audit approach rather than being built into existing processes.

[232] **Mr Murphy:** On that point, with regard to health and safety policies, there is an overarching policy that schools would have, which would be the one that Estyn would use and which schools are duty bound, quite rightly, to look at on an annual basis, and sometimes even more often than that. The big issue is that if you look at my own authority, there are over 100 policies to do with health and safety and different aspects of it. So, it becomes a generic term for what is effectively that essential lead policy that then explains the way around it. The sun screening and the policy would form part of that. It would almost be an addendum, or an item in it like pretty much everything else, whether it be swimming or educational visits—they are policies that are subsumed within that. Policies on the use of vehicles in and around schools, for instance, and the use of contractors on site all come into that overarching policy.

[233] **Aled Roberts:** Fodd bynnag, nid oes gennych dystiolaeth bod y sefyllfa honno yn bodoli ym mhob awdurdod lleol. Rydych chi'n dweud ei fod yn rhan o bolisi sir Fynwy, ond ni allwch ddweud bod hynny'n cael ei adlewyrchu ym mhob awdurdod addysg.

**Aled Roberts:** However, you do not have evidence that that situation exists in every local authority. You say that it is part of Monmouthshire's policy, but you cannot say that it is reflected in all education authorities.

[234] **Ms Brychan:** Na allwn. Nid oes dystiolaeth gennym i ddweud y naill ffordd neu'r llall. Byddwn hefyd yn dadlau mai yn y fan honno y dylid edrych yn benodol ar hyn. Nid oes gennym dystiolaeth ychwaith nad ydynt yn bodoli. Felly, i ateb y cwestiwn gwreiddiol, mae angen edrych i weld faint o waith ychwanegol, os o gwbl, y mae angen ei wneud er mwyn cael darlun cyson ar draws

**Ms Brychan:** No. We have no evidence to say one way or another. I would also argue that that is where we should look at this specifically. We also do not have any evidence that they are not in place. Therefore, to respond to the original question, we need to look to see how much additional work, if any, needs to be done so that we have a consistent picture across Wales.

Cymru.

[235] **Christine Chapman:** Suzy, did you want to come in?

[236] **Suzy Davies:** My questions have been answered, Chair.

[237] **Keith Davies:** Nid yw dau o'r undebau athrawon—nid eich rhai chi, ond dau arall—yn siŵr lle dylai'r cyfrifoldeb am amddiffyn plant rhag yr haul orffwys yn y pen draw, pa un a ddylai fod yn gyfrifoldeb ar rieni, athrawon neu awdurdodau lleol. Wrth ddarllen eu tystiolaeth, maent yn rhoi'r baich i gyd ar rieni, fwy neu lai. A ydych yn cytuno â hynny? Beth yw'ch barn chi ar hyn? Pwy sydd â'r cyfrifoldeb pennaf—yr awdurdodau lleol, yr athrawon yn yr ysgol neu'r rhieni?

**Keith Davies:** Two of the teachers' unions—not yours, but two others—are not sure where the ultimate responsibility should lie for protecting children from the sun, whether it should lie with parents, teachers or the local authorities. In reading their evidence, they put the entire burden on parents, more or less. Do you agree with that? What is your opinion on this? Who is ultimately responsible—the local authorities, the teachers in the school or the parents?

[238] **Ms Brychan:** Mae'r cyfrifoldeb yn cael ei rannu; mae cyfrifoldeb ar bawb yn hyn o beth. Cefndir datgan y gofid hwnnw yw ein bod ni'n siarad am blant yn cael eu niweidio gan yr haul. Mae'r plant hynny yn yr ysgol am 190 diwrnod y flwyddyn, ac am amser cyfyngedig yn unig hyd yn oed yn ystod y dyddiau hynny. Fel rheol, maent wedi cael eu gwisgo'n addas yn ystod y cyfnodau hynny; maent yn gwisgo gwisg ysgol ac nid ydynt yn rhedeg o gwmpas mewn dillad anaddas. Efallai eu bod yn fwy tebygol o wneud hynny ar y penwythnos. Felly, os mai ateb cwestiwn ynglŷn â chadw plant Cymru yn ddiogel yn yr haul yr ydym mewn gwirionedd, yna mae'r cyfrifoldeb ar rieni yn un dwys, oherwydd gyda'u rhieni y mae plant y rhan fwyaf o'r amser.

**Ms Brychan:** The responsibility is shared; everyone has a responsibility in this. The background to voicing that concern is that we are talking about children being harmed by the sun. Those children are in school for 190 days a year, and for a limited time only even on those days. As a rule, they are appropriately dressed during those periods; they wear a school uniform and they are not running around in inappropriate clothing. They may be more likely to do that on the weekend. Therefore, if what we are really discussing is safeguarding the children of Wales from the sun, then there is an enormous responsibility on parents, because children spend most of their time with their parents.

[239] Mae gofid arall wedi'i fynegi, y byddwn yn ei dderbyn yn llwyr, ynglŷn â thrafferth ymarferol rhoi eli haul ar blant yn yr ysgol. Nid yw rhai rhieni yn hapus eich bod yn rhoi eli ar eu plant, er enghraifft, ac mae gofid gwirioneddol ynglŷn â chyhuddiadau yn erbyn athrawon am gysylltiad corfforol â phlant. Mae hynny'n ofid gwirioneddol.

There is also a concern expressed, which I would totally accept, about the practicalities of applying sunscreen in school. Some parents would not be happy for you to apply sunscreen on their children, for example, and there is very real concern about accusations made against teachers with regard to physical contact with children. That is a real concern.

[240] **Mr Jones:** Anna is quite right: it is a partnership between parents and schools. The concern of the other unions and ours is that if you enshrine something as a compulsory duty, you alter the balance of legal liability and expose school staff to risks in terms of litigation, which might be deemed unfair and unreasonable. It is a partnership. Schools' uniform policies and advice to parents on suitable clothing for school are part of the process, but if you start to go down the road of saying that the school has a responsibility to prevent, or if it could be implied that schools have a duty to prevent, any child from being sunburnt, that raises all sorts

of implications in terms of potential litigation.

[241] **Keith Davies:** Earlier, Gareth, you said that that responsibility was in loco parentis.

[242] **Mr Jones:** Yes, it is, but that is the delicate legal matter; it is in loco parentis, but it is what any 'reasonable' parent would expect. This hangs on the term 'reasonable'. You have done enough legal cases to know what I mean by that. *[Laughter.]*

[243] **Mr Murphy:** Could I take you back to a statement made at the beginning? In my experience, in the cluster of schools that I am involved with, there has not been a recorded incident since the 1980s of concern regarding sunburn. You would expect prickly heat every now and again and, dare I say it, there may have been some incidents of children being in the first stages of heat exhaustion after being out playing during a lunch time in a world cup tournament on their playing field where there is no protection. However, there are people there with responsibility for these children. There has never been a recorded incident of sunburn.

[244] I said to Anna, when she first contacted me, that the problem is more apparent than real. Bearing in mind that I have led and still lead in Wales on sun protection, and given the activities that I get involved in regarding that specific activity where children are exposed, we do not have that problem here, even if you consider the opportunity for outdoor play and activities and Forest Schools. First of all, the nature of the word 'forest' suggests that there is a degree of protection, but the children themselves are appropriately kitted out. The agenda of the Welsh Government has been, since its inception, to provide children with appropriate materials to carry out these activities for which they are funded accordingly so that, throughout the school, funding has been made available. Questions need to be asked, if that funding has not been used. However, there has never been a recorded incident of a problem.

[245] **Jocelyn Davies:** My supplementary question was the one that Keith asked. You assured us earlier that there was this overarching legal duty for the headteacher to take responsibility as though he or she were a parent, but now we are worried about litigation and about this being a legal responsibility; I am not entirely convinced by that.

[246] You recommend that your members do not apply sunscreen, but we heard earlier from the WLGA that some teachers do, although it seems to be under the radar and on an informal basis. We heard from Tenovus earlier that many teachers would like to be able to apply sunscreen. So, why do you recommend that your members do not apply sunscreen to children?

[247] **Ms Brychan:** Our advice centres on the general rather than the particular. We have to have regard for all our members in situations that are reasonable and in relationships that are less so. Therefore, our advice is based on those considerations—in general for our members, we know that the dangers of going down this road are significant enough for us, as an association, to say that there are other ways of dealing with this, so you should not take on that responsibility—although we know that in specific cases, they do, and feel under pressure to do so. We do not want them to feel that pressure, because it can lead to difficult cases for them. A lot of our members will demonstrate to the smallest children how to apply sunscreen properly, which seems entirely sensible. Teachers do that kind of thing regularly and that seems sensible. However, our position is that we need to give them general advice.

[248] **Jocelyn Davies:** There may well be children who are particularly sensitive to the sun. I was when I was very young, since I have ginger hair and pale skin, but we did not have sunscreen then. I do not think that it had been invented. However, some parents might send sunscreen in to school with a particularly sensitive child, and you are suggesting that it is perfectly appropriate for teachers to tell the child what they have to do, rather than putting

their own hands on the child. There is the other issue, not just of applying the sunscreen, but of educating about the dangers of the sun. Do you have any views on that?

[249] **Ms Brychan:** Members' responses on that were quite detailed, in many cases, describing exactly what they do in that regard. They demonstrate how to use it and talk a lot about the dangers of exposure to the sun. It is part of the conversation that they have with pupils. An awful lot of that work is already going on, because this has received a lot of attention. Your colleague described it earlier as a 'hot topic' and now I cannot get that out of my head, although I know that it is deeply inappropriate in this context. However, that has had an effect on the way that teachers and headteachers deal with the topic in schools. It has been a topic of discussion and it is part of the education that pupils are offered already.

[250] **Keith Davies:** O ran yr hyn a ddywedodd Jocelyn, beth am staff cynorthwyol mewn ysgolion? Mae nifer fawr o staff cynorthwyol mewn ysgolion. Nid ydynt yn athrawon ond maent yno i gefnogi plant. Beth amdanant hwy? Undeb i brifathrawon ydych chi.

**Keith Davies:** As regards what Jocelyn said, what about support staff in schools? There are a lot of support staff in schools. They are not teachers, but they are there to support the children. What about them? Your union represents headteachers.

[251] **Ms Brychan:** Nid wyf yn gwybod pa gyngor y mae eu hundebau yn rhoi iddynt. Byddwn yn rhagweld eu bod yn rhoi cyngor tebyg iawn i'r cyngor rydym ni yn ei gynnig.

**Ms Brychan:** I do not know what advice their unions give them. I would predict that they give similar advice to ours.

[252] **Mr Murphy:** I will just pick up on that point about classroom assistants and their role. There is not a glut of them, and if I look at it in real time, thank goodness for the foundation phase. We have a situation where we can guarantee that there is another adult, in addition to the teacher, with the children. For 30 children, there will possibly be two adults. If you go from seven-year-olds upwards, unless there are specific reasons for it, you would not have anybody extra anyway—there is certainly no funding for it—bearing in mind that that is something that needs to be looked at. There would be a practical demand, but it would be made around the fact that there is no evidence to suggest that there is a great need. However, there are young people who, because of sensitive skin, would have specific support given, and education for that is something all schools face. I doubt that there is a school in Wales that does not have specific cases of children who have been sent in to school with sun cream. The concern then is that the sun cream is looked after in a way that is in accordance with the guidance, through the school organisation, because there are children who have reactions to certain medicines, and you need to be aware of that. That is part of ongoing health and safety practices in schools.

[253] **Jocelyn Davies:** Coming back to the issue of the education of young people, because Tenovus, certainly, is very keen that we educate society about the dangers of the sun, how easy is it to do that when you live in a society that worships the sun? You go to the beach with children and tell them to cover up, then lie out in the sun. How easy is it for schools to tackle that? Surely, children are receiving mixed messages.

11.15 a.m.

[254] **Mr Murphy:** A lot of our discussions have been about the fact that it is not about schools carrying out education on this issue by themselves, but in working with parents and vice versa. We are very much part of a partnership. From the school's perspective, we get engaged in several things that sometimes present challenges, because we have to educate parents as well. Most, if not all, of us here are parents, but, forgive me, there is a challenge in that we have to educate parents to understand. You are right that it is a funny thing, because

the children leave at 3.15 p.m. or 3.30 p.m. and teachers could be driving home and see that the children are wearing flimsy clothes outside in the height of summer. Is there protection then? We have to work at it. We keep badgering away, like good parents, trying to find the keys to educating people. That is what we need to look at.

[255] Anna hinted at the role that schools have to look at all parts of safety education throughout the school. Part of the curriculum is to look at wellbeing and what children themselves do. So, screening children from the sun and what needs to be done in that regard would and should be something developed in schools. What used to be called personal and social education—or personal, social, health and economic education in England—is a prominent part of the curriculum. It is an intrinsic part of the role of the profession.

[256] **Ms Brychan:** The basic answer to the question is that it is not at all easy when children are subjected to mixed messages. Increasingly, as with cultural feelings about the anti-smoking message, children end up going home with these messages and saying, ‘You shouldn’t be doing that’. It might be a question of who ends up educating whom on sun safety.

[257] **Mr Jones:** Last year, the Welsh Government introduced a provision for having a school nurse in every secondary school, working with the feeder schools. I wonder whether the school nurse service has a role to play in advising parents and cultivating that understanding.

[258] **Christine Chapman:** Okay—

[259] **Mr Jones:** That brought smiles. I am not quite sure why. [*Laughter.*]

[260] **Aled Roberts:** We had a visit to a school in Barry, so I think that we have some questions regarding the roll-out.

[261] **Jenny Rathbone:** I want to ask about the issue of the application of sunscreen. Is it possible to get some clarity about the acceptability of staff in the foundation phase applying sunscreen to the face and arms of children without any risk of being wrongly accused of inappropriate contact, given that there are always going to be some other adults present?

[262] **Christine Chapman:** Is there any evidence?

[263] **Jenny Rathbone:** Over the age of seven, unless they have a significant learning difficulty, the child can be shown how to do it themselves. However, under that age, it will mostly go on the furniture.

[264] **Ms Brychan:** I cannot see how you would arrive at a position where you could be sure that no accusation would be made.

[265] **Jenny Rathbone:** However, on balance, for the protection of the child, given the in loco parentis duty, surely a bit more common sense could be applied to this.

[266] **Ms Brychan:** I think that it is a case of wishing once more that common sense were more common. [*Laughter.*]

[267] **Mr Jones:** There are legal implications. You increase the risk. For example, if a child has an allergic reaction to sunscreen, who is responsible?

[268] **Jenny Rathbone:** Okay, I can see all that, but if the parent has sent in some sunscreen for this very young child, surely the parent is saying, ‘Please help my child to put it

on’.

[269] **Ms Brychan:** Yes, and, in fact, that is largely what happens. Legislating for reasonableness on every occasion is not something that we have cracked yet. To go back to the in loco parentis issue, I think that we may have inadvertently introduced a bit of a red herring in that, although what everyone says is perfectly true, our fundamental argument about this particular proposal on sunscreen is not that there is any objection to the in loco parentis role—and we are entirely happy that this is looked at again in terms of the risk assessment and environmental considerations and that there is more conversation about sun safety if we are increasingly worried about the effects of the sun—but that we do not think that the application of sunscreen in schools and the provision of it through schools will answer the problem that has been identified by this petition, rather than us wanting to go into the discussion about the loco parentis and the legalities of it all.

[270] **Christine Chapman:** As a committee, it would be useful to write again to the Welsh Government to seek clarity on this issue of contact, so that we can be absolutely sure.

[271] **Jocelyn Davies:** [*Inaudible.*]

[272] **Suzy Davies:** When talking about smaller children, which Jenny mentioned, how does your advice sit with the advice that is given to child minders, *cylchoedd meithrin* and nursery school staff, who have to apply it?

[273] **Ms Brychan:** I do not know. You would have to ask them how they arrived at a position where they are happy to do that.

[274] **Suzy Davies:** Perhaps we could put that in the same note to the Welsh Government.

[275] **Christine Chapman:** I want to move on to Aled now, because there is an issue about shaded areas.

[276] **Aled Roberts:** Rydym yn sôn am adeiladu ysgolion newydd a’r ffaith nad yw’n ymddangos bod darparu cysgod mewn ysgol yn rhan o’r canllawiau ar gyfer rhaglen ysgolion yr unfed ganrif ar hugain. A oes gennych unrhyw dystiolaeth ynglŷn â’r ffaith bod rheidurwydd ar awdurdodau lleol i ddarparu cysgod mewn ysgolion, pa un a ydynt yn ysgolion newydd ynteu’n rhai sy’n cael eu hailfodelu?

**Aled Roberts:** We are talking about the building of new schools and the fact that it appears that providing shade in schools is not part of the guidelines for the twenty-first century schools programme. Do you have any evidence on the fact that local authorities are obliged to provide shade in schools, be they new schools or ones that are being remodelled?

[277] **Mr Jones:** I do not have any evidence on that. I do not know whether you have, Anna?

[278] **Ms Brychan:** Roedd hyn yn rhan o ymateb llawer o aelodau, yn enwedig yn y cyfnod sylfaen lle mae ystafell ddosbarth y tu allan yn rhan o’r cwricwlwm. Mae problemau ynglŷn â gallu cael adnoddau digonol i ddarparu cysgod. Felly, mae rhinwedd mewn trafod ymhellach pa ystyriaeth sydd wedi’i rhoi i hynny yn y canllawiau sydd ar waith ar hyn o bryd ynglŷn ag adeiladau ysgolion newydd. Mae

**Ms Brychan:** This was part of the response of many members, particularly in the foundation phase where an outdoor classroom is part of the curriculum. There are problems with being able to have sufficient resources to provide shade. So, there is some merit in further discussion of what consideration has been given to that in the guidelines that are currently in place when building new schools. There is also a need to

hefyd angen mynd i'r afael â'r broblem address the problem in older schools where it  
 mewn hen ysgolion lle mae'n debygol nad is likely that it has not been a consideration at  
 yw wedi bod yn ystyriaeth o gwbl yn y all in the past.  
 gorffennol.

[279] **Jocelyn Davies:** As Aled mentioned, we have heard evidence about there being a number of brand-new schools without shade. Are headteachers not involved at all in the design of schools? [*Laughter.*]

[280] **Mr Murphy:** Having been responsible for opening a new school, the answer to that is that we are involved, but what is actually carried out is not necessarily what we would like to see at the end. You are always planning for an education that is looking to the future. My school was built in 2001, and we have had several schools built since, but the outdoor learning aspect has not been part of the new build in nearly all of those instances. There have been significant moves through the foundation phase to make that happen, and schools are going it alone, effectively, which is not a satisfactory state of affairs. Schools, because of the very nature of the requirements and the desire for working outdoors, are trying to maximise any opportunities that they can for this provision. The answer is an absolutely overwhelming, 'Yes, it should be considered'.

[281] **Ms Brychan:** That also came back in one of the replies that we had. Yes, they are involved, but they do not always win.

[282] **Christine Chapman:** Gareth, did you have a comment?

[283] **Mr Jones:** I do not have any evidence.

[284] **Christine Chapman:** We have to draw this session to a close. There may be some other questions that we have not covered, but if you are happy for us to do so, we will write to you and perhaps you could respond. I thank you all for attending today and providing evidence. We will send you the transcript in due course for you to check for factual accuracy. Thank you; it was good to see you all this morning.

11.24 a.m.

**Cynnig o dan Reol Sefydlog Rhif 17.42(vi) i Benderfynu Gwahardd y Cyhoedd  
 o'r Cyfarfod  
 Motion under Standing Order No. 17.42(vi) to Resolve to Exclude the Public  
 from the Meeting**

[285] **Christine Chapman:** I move that

*the committee resolves to exclude the public from the remainder of the meeting in accordance with Standing Order No. 17.42(vi).*

[286] I see that the committee is in agreement.

*Derbyniwyd y cynnig.  
 Motion agreed.*

*Daeth rhan gyhoeddus y cyfarfod i ben am 11.24 a.m.  
 The public part of the meeting ended at 11.24 a.m.*