

**National Assembly for Wales**  
Children and Young People Committee

Inquiry into school sun protection policy

May 2012



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Children and Young People Committee

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## Children and Young People Committee

The Committee was established on 22 June 2011 with a remit to examine legislation and hold the Welsh Government to account by scrutinising expenditure, administration and policy matters encompassing: the education, health and wellbeing of the children and young people of Wales, including their social care.

### Current Committee membership



**Christine Chapman (Chair)**

Welsh Labour  
Cynon Valley



**Angela Burns**

Welsh Conservatives  
Carmarthen West and South  
Pembrokeshire



**Jocelyn Davies**

Plaid Cymru  
South Wales East



**Keith Davies**

Welsh Labour  
Llanelli



**Suzy Davies**

Welsh Conservatives  
South Wales West



**Julie Morgan**

Welsh Labour  
Cardiff North



**Lynne Neagle**

Welsh Labour  
Torfaen



**Jenny Rathbone**

Welsh Labour  
Cardiff Central



**Aled Roberts**

Welsh Liberal Democrats  
North Wales



**Simon Thomas**

Plaid Cymru  
Mid and West Wales

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## The Committee's recommendations

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The Committee's recommendations are listed below, in the order that they appear in this Report. Please refer to the relevant pages of the report to see the supporting evidence and conclusions:

**Recommendation 1.** The Welsh Government should work with the Welsh Local Government Association to raise awareness of the existing *SunSmart* guidelines within educational settings. (Page 10)

**Recommendation 2.** As part of schools' broader health and safety policy, they should be required to have a document which sets out the school's approach to a range of environmental factors which might affect children during the school day, including sun protection and shade requirements, and wet or cold weather. (Page 10)

**Recommendation 3.** Work should be undertaken through existing mechanisms, such as the Wellbeing strand of the Estyn inspection framework, to identify and share good practice on approaches to sun protection between schools and local authorities. (Page 11)

**Recommendation 4.** Consideration should be given to the equipment provided to, and the school uniform requirements for, children in the Foundation Phase to ensure that they are suitably protected to be outside in a range of weather conditions. (Page 12)

**Recommendation 5.** The Welsh Government should issue new guidance which specifically advises on best practice in the provision of shade, both within new school buildings and for the process of refurbishing existing school buildings. (Page 13)

**Recommendation 6.** The Welsh Government, Welsh Local Government Association, schools and third sector organisations should continue to work together to deliver sun protection education to children. (Page 13)

## 1. Background

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1. On 4 October 2011 the National Assembly for Wales received a petition from cancer charity Tenovus which said:

“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.”<sup>1</sup>

2. The petition, which had received more than 9,000 signatures when it was submitted to the Assembly, was referred to the Children and Young People Committee for consideration.

3. The Committee agreed to undertake a short inquiry on the broader issue of sun protection for children in schools, including the wearing of suitable clothing and the provision of shade in schools.<sup>2</sup>

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<sup>1</sup> P-04-337 *Tenovus: Free sunscreen*, 4 October 2011

<sup>2</sup> Minutes of the Children and Young People Committee CYP(4)-04-12, 1 February 2012



## **2. Committee inquiry**

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4. The Committee issued a general call for evidence, and undertook a targeted written consultation. In total, eight responses were received. There was no overall support for the provision of free sunscreen, with respondents generally suggesting that sun safe behaviour, such as wearing protective clothing or use of shade when the sun is at its strongest, was more important. Reference was also made to the health benefits of some sun exposure, for example, for vitamin D. Some concern was expressed about the application of sunscreen to children by school staff.

5. An oral evidence session was held on 21 March, during which the Committee took evidence from Tenovus, the Welsh Local Government Association (WLGA), the National Association of Head Teachers Wales (NAHT), and the Association of School and College Leaders Wales (ASCL).

6. Lists of witnesses and consultation respondents who provided written and oral evidence for this inquiry can be found at Annexes A, B and C.

### 3. Key issues and recommendations

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#### Sunscreen

7. The Committee heard from all of the witnesses on 21 March that the provision of sunscreen should only be one element in a holistic approach to sun protection. Tenovus said that its petition had focused on sunscreen because of the cost barrier it presented to many families,<sup>3</sup> but that it was pleased that consideration was being given to the broader sun safety context.<sup>4</sup>

8. Concerns were raised in the written and oral evidence about any proposal to make the provision of sunscreen in schools compulsory, including hygiene, potential allergies, time and resource implications, and potential child protection issues. The WLGA said that these issues would not be insurmountable, but would need careful consideration.<sup>5</sup> The NAHT told the Committee that it would be concerned if pressure were put on its members to apply sunscreen to children.<sup>6</sup>

9. The Committee took the view that if sunscreen were to be provided in school settings, regardless of whether it was provided by parents or schools, greater clarity would be needed on existing guidance in respect of teachers, childminders or nursery school staff having physical contact with children in order to apply sunscreen.

10. The WLGA gave evidence of cost estimates it had undertaken, which indicated that providing sunscreen to children in primary schools across Wales could cost approximately £3.4 million per year.<sup>7</sup> Written evidence received from the Dermatology Council for Wales, and endorsed by the Royal College of Physicians, stated that:

“providing free sunscreen would not be the best use of resources. Generally, consensus opinion in the world of sun protection is that the use of sunscreens should come after

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<sup>3</sup> ROP [para 51], 21 March 2012, Children and Young People Committee

<sup>4</sup> Children and Young People Committee Paper (CYP(4)-10-12 Paper 1, *Inquiry into Sun Protection Policy*, Written evidence from Tenovus, 21 March 2012

<sup>5</sup> ROP [para 144], 21 March 2012, Children and Young People Committee

<sup>6</sup> *Ibid* [para 247]

<sup>7</sup> *Ibid* [para 136]

adequate attention has been given to modifying sun exposure behaviour.”<sup>8</sup>

11. In a letter to the Chair of the Committee, the Minister for Health and Social Services outlined the Welsh Government’s support for the UK-wide *SunSmart* campaign and its work with Cancer Research UK to develop sun protection policy guidance for nurseries and schools in Wales. The Minister said that:

“the proportion of people protecting themselves remains quite low, showing a need for continued activity in the area of sun safety and skin cancer awareness.”<sup>9</sup>

12. To address this need, the Minister said that Public Health Wales would be taking on responsibility for the skin cancer prevention programme. The use of sunscreen is one of the measures promoted by Cancer Research UK, but only as one element within a broader approach.

13. The Committee welcomed the broader approach to sun safety and skin cancer prevention, and decided not to endorse Tenovus’ petition.

### **Sun protection policy and guidance within education**

14. The Committee heard from Tenovus that despite the range of guidance available on sun protection, it continued to hear anecdotal evidence of unsafe sun behaviour when it visited schools,<sup>10</sup> and that research undertaken by the Teenage Cancer Trust suggests that “nearly a third of teenagers never use sunscreen, and a quarter will actually try to burn on purpose”.<sup>11</sup>

15. The Welsh Government has made the *SunSmart* guidelines on sun protection available to schools and pre-schools in Wales. The Committee heard that there was no significant evidence that there was not sufficient awareness of the guidance within schools,<sup>12</sup> but the WLGA said that there was always scope for greater awareness raising

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<sup>8</sup> Children and Young People Committee, *Inquiry into Sun Protection Policy*, Consultation response from the Dermatology Council for Wales, CYP(4) SP03

<sup>9</sup> Children and Young People Committee, *Inquiry into Sun Protection Policy*, Letter from Minister for Health and Social Services, 12 January 2012

<sup>10</sup> ROP [paras 71-73], 21 March 2012, Children and Young People Committee

<sup>11</sup> Children and Young People Committee Paper (CYP(4)-10-12 Paper 1, *Inquiry into Sun Protection Policy*, Written evidence from Tenovus, 21 March 2012

<sup>12</sup> ROP [paras 202 and 207], 21 March 2012, Children and Young People Committee

and sharing of best practice, and that it would be happy to work with the Welsh Government in this respect.<sup>13</sup>

**Recommendation: The Welsh Government should work with the Welsh Local Government Association to raise awareness of the existing *SunSmart* guidelines within educational settings.**

16. The *SunSmart* guidelines do not constitute a sun protection policy, rather a checklist of the factors schools should consider in developing their own policies. Evidence from the WLGA suggested that a standardised sun protection policy for all schools would be ineffective, as it could not take account of the specific circumstances within each school, for example the availability of shade on the school premises.<sup>14</sup>

17. The Committee heard evidence from the NAHT and ASCL that while there is no requirement for schools to have specific sun protection policies, head teachers consider issues relating to environmental factors, such as sun exposure or extreme cold, as part of their broader health and safety policies.<sup>15</sup> This is not, however mandatory.

18. The Committee agreed that, if a sun protection policy were to be an effective document, it would need to be developed by each school individually, and was persuaded that other environmental factors should also be considered.

**Recommendation: As part of schools' broader health and safety policy, they should be required to have a document which sets out the school's approach to a range of environmental factors which might affect children during the school day, including sun protection and shade requirements, and wet or cold weather.**

19. In its evidence, Tenovus expressed concern that there was no monitoring of the approaches to sun protection taken by schools, and said that this would be needed to inform any further work or additional measures which needed to be taken across Wales.<sup>16</sup> The Committee agreed with the evidence it heard from the WLGA, the NAHT and the ASCL that any monitoring or sharing of best practice

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<sup>13</sup> ROP [paras 127 and 131] 21 March 2012, Children and Young People Committee

<sup>14</sup> Ibid [para 125]

<sup>15</sup> Ibid [paras 207 and 222]

<sup>16</sup> Ibid [para 45]

should take place through existing mechanisms such as the Wellbeing strand of the Estyn inspection framework,<sup>17</sup> the Welsh Healthy Schools Network<sup>18</sup> or through school governors' annual reports.<sup>19</sup>

**Recommendation: Work should be undertaken through existing mechanisms, such as the Wellbeing strand of the Estyn inspection framework, to identify and share good practice on approaches to sun protection between schools and local authorities.**

### **Foundation Phase**

20. The Foundation Phase outdoor learning handbook states that teachers should “consider the weather and what equipment/clothing the children and practitioners will need.”<sup>20</sup> It does not, however, specifically mention the provision of sun protection or shade.

21. Throughout the handbook, reference is made to the importance of teachers using weather as an element of the natural environment which can contribute to children’s learning and says that “research also shows that children who go outside in all weathers are more robust”.<sup>21</sup>

22. In its oral evidence Tenovus said that research undertaken in the south west of England had shown that increasing the amount of shade available in school playgrounds increased the amount of outdoor play that children had, while reducing the amount of ultra-violet exposure.<sup>22</sup>

23. The Committee agreed that provision should be made within existing budgets for suitable equipment to enable Foundation Phase children to be outside safely in the rain or in the sun. The particular equipment required will vary from school to school, but consideration could be given to the provision of sun hats as part of a school’s resources for outdoor learning.

24. Within school settings beyond the Foundation Phase, consideration could also be given to the specifications for school uniforms, for example the inclusion of light-weight long-sleeved tops,

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<sup>17</sup> ROP [para 231], 21 March 2012, Children and Young People Committee

<sup>18</sup> Ibid [para 135]

<sup>19</sup> Ibid [para 119]

<sup>20</sup> Welsh Government, *Foundation Phase Outdoor Learning Handbook*

<sup>21</sup> Ibid

<sup>22</sup> ROP, [para 92], 21 March 2012, Children and Young People Committee

school hats, or school uniform with a minimum built-in sun protection factor. The Committee highlighted that any amendment to school uniform requirements would need to keep costs to a minimum.

**Recommendation: Consideration should be given to the equipment provided to, and the school uniform requirements for, children in the Foundation Phase to ensure that they are suitably protected to be outside in a range of weather conditions.**

### **21<sup>st</sup> Century Schools programme**

25. Written evidence from the Dermatology Council for Wales stated that:

“Provision of shaded areas should be mandatory in any new buildings. In existing schools, canopies, awnings or trees should be considered.”<sup>23</sup>

26. The Minister for Education and Skills, in a letter to the Committee, said that responsible bodies had a duty to ensure that school buildings and grounds must provide reasonable assurance of occupants’ health and safety, and said that:

“local authorities can, through the 21<sup>st</sup> Century Schools programme, access guidance and best practice when developing the design of new school buildings or existing school buildings.”<sup>24</sup>

27. The Minister also said that this guidance would continue to be improved and enhanced by working or consulting with organisations such as Tenovus.

28. However, the evidence received from the NAHT was that there is some doubt over whether there is provision of adequate resources and shaded areas in new and refurbished schools, and whether there is sufficient involvement of head teachers in the design and build of the outdoor learning environment, particularly for the Foundation Phase.<sup>25</sup>

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<sup>23</sup> Children and Young People Committee, *Inquiry into Sun Protection Policy*, Consultation response from the Dermatology Council for Wales, CYP(4) SP03

<sup>24</sup> Children and Young People Committee, *Inquiry into Sun Protection Policy*, Letter from Minister for Education and Skills, 9 January 2012

<sup>25</sup> ROP [paras 278-280], 21 March 2012, Children and Young People Committee

**Recommendation: The Welsh Government should issue new guidance which specifically advises on best practice in the provision of shade, both within new school buildings and for the process of refurbishing existing school buildings.**

### **Sun education**

29. The Committee received evidence that malignant melanoma has doubled in prevalence between 1999 and 2009, making it the fastest growing cancer in the UK. In addition, blistering sunburn in childhood has been shown to double the risk of an individual developing skin cancer in later life.<sup>26</sup> However, the evidence received from the NAHT was that there were few reported incidents of sunburn in schools.<sup>27</sup>

30. Children only spend a proportion of their time in schools, and of that time, only a proportion involves sun exposure. All of the witnesses who gave oral evidence to the Committee agreed that responsibility for protecting children from the sun must be shared between parents and schools, and that there was scope for joint working with the third sector to improve sun protection education. Tenovus said that working with individual schools could result in resource implications for voluntary organisations, but agreed that there was a role for them in providing information in innovative ways for use in schools.<sup>28</sup>

**Recommendation: The Welsh Government, Welsh Local Government Association, schools and third sector organisations should continue to work together to deliver sun protection education to children.**

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<sup>26</sup> ROP [para 6], 21 March 2012, Children and Young People Committee

<sup>27</sup> Ibid [para 243-244]

<sup>28</sup> Ibid [para 61]

## **Annex A – Witnesses**

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The following witnesses provided oral evidence to the Committee on 21 March 2012. Transcripts of all oral evidence sessions can be viewed in full at:

<http://www.senedd.assemblywales.org/mgIssueHistoryHome.aspx?Ild=1305>

Dr Ian Lewis	Tenovus
Dr Chris Llewelyn Daisy Seabourne	Welsh Local Government Association
Gareth Jones	Association of School and College Leaders Cymru
Anna Brychan Graham Murphy	National Association of Head Teachers Cymru



## **Annex B – List of written evidence**

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The following people and organisations provided written evidence to the Committee. All written evidence can be viewed in full at: <http://www.senedd.assemblywales.org/ielIssueDetails.aspx?IId=3109&Opt=3>

<b>Date</b>	<b>Organisation</b>	<b>Reference</b>
21 March 2012	Tenovus	CYP(4)-10-12 (p1)
21 March 2012	Welsh Local Government Association	CYP(4)-10-12 (p2)
21 March 2012	Association of School and College Leaders Wales and National Association of Head Teachers Wales	CYP(4)-10-12 (p3)

## **Annex C – Consultation responses**

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The following people and organisations responded to the call for evidence. All responses can be viewed in full at:

<http://www.senedd.assemblywales.org/mglIssueHistoryHome.aspx?Ild=3109&Opt=0>

CYP(4) SP01	Lisa – member of the public
CYP(4) SP02	Michael Ball
CYP(4) SP03	Dermatology Council for Wales
CYP(4) SP04	Public Health Wales
CYP(4) SP05	National Association of Schoolmasters Union of Women Teachers
CYP(4) SP06	Undeb Cenedlaethol Athrawon Cymru
CYP(4) SP07	National Childminding Association Cymru
CYP(4) SP08	Royal College of Physicians