



Australian Children's
Education & Care
Quality Authority

These guidelines are part of a series intended to assist in the development of your service's policies and procedures required under regulations 168 and 169. They set out the main components to be included in your policies and procedures, and considerations for each component.

They should guide how you develop your policies and procedures, and are not an exact format to be followed.

SUN PROTECTION

POLICY GUIDELINES

Under the *Education and Care Services National Regulations*, an approved provider must ensure that policies and procedures are in place in relation to sun protection (regulation 168) and take reasonable steps to ensure those policies and procedures are followed (regulation 170).

In addition, the approved provider of a centre-based service must ensure that outdoor spaces at the service premises include adequate shaded areas to protect children from overexposure to ultraviolet (UV) radiation from the sun (regulation 114). These spaces should meet the recommendations of relevant recognised authorities. Shade may be provided by large trees, heavy shade cloths and solid roofs (Guide to the NQF – Operational Requirements, Quality Area 3).

As excursions can present different sun exposure risks, it is important that sun protection is considered as part of excursion risk assessments.

Your policy and procedures should address these requirements, as well as quality practices relating to sun protection contained in the National Quality Standard.

Every service is different so it is not sufficient to apply generic policies and procedures to multiple services. You will need to contextualise your policies and procedures to your service's operations and its unique context.

1. Title

Sun protection policy

2. Policy statement

The policy statement will reflect your service's philosophy and approach to sun protection.

For example:

We are committed to providing children with a safe environment that provides shade and other sun protection to support their learning and opportunities for play.

3. Background

Your policy needs to include a statement of why this policy is in place.

For example:

The *Education and Care Services National Regulations* require policies and procedures to be in place in relation to sun protection.

The vast majority of skin cancers, including melanoma, are caused by over-exposure to UV radiation from the sun.

The World Health Organisation has cautioned that ‘children’s UV exposure should be carefully limited because they are in a dynamic state of growth and therefore more susceptible to environmental threats than adults. Many vital functions such as the immune system are not fully developed at birth, and unsafe environments may interfere with their normal development’ (who.int/health-topics/ultraviolet-radiation#tab=tab_2).

4. Legislative requirements

Your policy must be consistent with, and refer to, legislative requirements for sun protection. Examples include, but are not limited to:

Section/regulation	Description
Section 167	Offence relating to protection of children from harm and hazards
Regulation 100	Risk assessment must be conducted before excursion
Regulation 113	Outdoor space – natural environment (centre-based services)
Regulation 114	Outdoor space – shade (centre-based services)
Regulation 116	Assessments of family day care residences and approved family day care venues
Regulation 168	Education and care service must have policies and procedures
Regulation 169	Additional policies and procedures – family day care services
Regulation 170	Policies and procedures to be followed
Regulation 171	Policies and procedures to be kept available
Regulation 172	Notification of change to policies or procedures

When writing your policy, you will need to break down what is required under each regulation and how your service will meet these requirements. How these work in practice will be contained in your procedures.

As you reflect on your ***Sun protection policy***, it might highlight the need to split its various areas into different policies and procedures that can be readily accessed by all educators and staff members to follow. For example, you may wish to have separate policies for *Personal sun protection* and *Environmental sun protection*.

5. Principles to inform your policy

All decision-making should be carried out in accordance with the principles of your service’s ***Sun protection policy***. Examples of principles could include, but are not limited to:

- The safety, health and wellbeing of children is our number one priority. Our educators and staff implement policies and procedures to protect children from UV radiation from the sun, as well as burns from exposure to surfaces heated by the sun.
- Outdoor play experiences are an important part of our children’s healthy growth, learning, wellbeing and development. We ensure that the outdoor environment offers the required shade and other sun protection measures are implemented by the educators.
- We create opportunities for children to learn and develop, and this includes incorporating sun protection awareness into the program.
- Our educators and staff role model quality educational practices, including sun safe practices.
- We encourage involvement by families in our educational program and see them as valuable partners in promoting the importance of sun protection.

6. Key terms

To make it easier for your audience, provide definitions of key terms that may not be used every day. For example:

Term	Meaning	Source
ACECQA – Australian Children’s Education and Care Quality Authority	The independent national authority that works with all regulatory authorities to administer the National Quality Framework, including the provision of guidance, resources and services to support the sector to improve outcomes for children.	acecqa.gov.au
Risk assessment	Assessing the risk means working out how likely it is that a hazard will harm someone and how serious the harm could be.	acecqa.gov.au/media/29421
Sun protection times	Sun protection measures are recommended when the UVI is 3 and above.	bom.gov.au/uv/ cancer.org.au/cancer-information/causes-and-prevention/sun-safety/uv-index
Sun protection factor (SPF)	The Australian standard for sunscreen, the SPF indicates the level of protection provided against UVR.	arpansa.gov.au/understanding-radiation/radiation-sources/more-radiation-sources/sun-protection-sunscreen
Ultraviolet Index (UVI)	A measure of the level of UVR. The higher the UVI, the greater the potential for damage to the skin and eyes, and the less time it takes for harm to occur. Sun protection measures are recommended when the UVI is 3 and above.	who.int/news-room/q-a-detail/ultraviolet-(uv)-index bom.gov.au/uv/
Ultraviolet radiation (UVR)	The portion of the electromagnetic spectrum between 100 nanometers (nm) and 400nm: <ul style="list-style-type: none"> • ‘UVA’ – UVR in the range 315nm to 400nm is thought to contribute to premature aging and wrinkling of the skin and has been implicated as a cause of skin cancer. • ‘UVB’ – UVR in the range 280nm to 315nm is more dangerous than UVA and has been implicated as the major cause of skin cancers, sunburning and cataracts. • ‘UVC’ – UVR in the range 100nm to 280nm is extremely dangerous but does not reach the earth’s surface due to absorption in the atmosphere by ozone. 	arpansa.gov.au/understanding-radiation/what-is-radiation/non-ionising-radiation/ultraviolet-radiation

7. Links to other policies

Refer to related policies and procedures, for example:

- Providing a child safe environment
- Enrolment and orientation
- Excursions
- Governance and management
- Interactions with children

8. Induction and ongoing training

State information about induction training and frequency of ongoing training and information sharing to assist managers, coordinators, educators and other staff to fulfil their roles effectively.

9. Policy created/reviewed

Include the date the policy was created, reviewed or changes were made.

10. Monitoring, evaluation and review

State when the policy will be reviewed and who will be responsible for this.

11. Checklist

- Have you referenced the relevant regulations and are these reflected in the policy?
- Does the title provide a clear and concise statement identifying the intent of the policy?
- Have you checked the policy requirements and referenced related legislation that applies to your service type?
- Does your policy statement provide a framework for decision-making and ensure consistent practice?
- Does your policy statement reflect your service’s philosophy?
- Is it clear why this policy exists?

PROCEDURES GUIDELINES

Under the *Education and Care Services National Regulations*, an approved provider must ensure policies and procedures are in place in relation to sun protection. These guidelines are part of a series and are intended to assist in the development of your policies and procedures required under regulations 168 and 169. They are to guide you to develop your policies and procedures, and are not an exact format to be followed.

Your procedures should be written in clear and concise language, making them easy to read, understand and implement.

The steps and guidelines you document will not only guide your practice, but also inform regulatory authorities of educator and staff expectations and responsibilities at the service.

When thinking about your procedures for sun protection, they need to be practical and achievable. For example, if your procedures state that you display and update the Ultraviolet Index (UVI) daily, you will need to make sure that steps are in place for this to occur.

1. Title

Sun protection procedures

2. Reference to policy and philosophy

Here you refer to your ***Sun protection policy*** as seen in your policy documents. You can reference where you will find the policy to help those looking for it.

Your procedures will also reflect your service's overall philosophy and evidence-based best practice guidelines for sun protection.

3. Procedures

This is where you detail the way you will implement the ***Sun protection policy***.

It is the 'How to' in your service and includes specific step-by-step procedures for sun protection.

Some areas that will be outlined here will include:

- where the procedures will be kept
- when they were last reviewed
- templates, documents or information that might be required and/or used as a part of the procedures (e.g. shade guidelines, risk assessment templates, UVI)
- resources required for the implementation of procedures, e.g. shade structures, sunscreen, hats
- systems to monitor the implementation of the procedures.

You will also need to consider:

- optimised shade design and use
- actions to minimise unsafe ultraviolet radiation (UVR) exposure, e.g. use of shaded areas, appropriate clothing and hats, sunscreen, outdoor play at certain times (depending on climatic and seasonal conditions, etc.)
- special precautions for children under 12 months of age
- incorporating sun protection considerations in risk assessments for excursions
- integration of sun protection awareness in educational programming and planning.

As you reflect on your ***Sun protection policy***, it might highlight the need to split its various areas into different procedures, which will be displayed or accessed by all staff to follow in relation to their required actions. For example, you may wish to have separate procedures for *Personal sun protection* and *Environmental sun protection*.

4. Roles and responsibilities

This is where you will designate specific roles and responsibilities for the people who hold different positions within your service. This needs to align with the *Education and Care Services National Regulations* (see pp. 6–7 below).

It is important to note that it is the legal responsibility of approved providers to ensure systems are in place to minimise risk and ensure health and safety procedures are implemented by the responsible people in services including family day care (FDC) environments (if applicable). Ultimate responsibility lies with the approved provider to ensure their service/s are meeting the requirements under the *Education and Care Services National Law*.

When developing this section consider:

- What are the roles and responsibilities of the approved provider, responsible person, nominated supervisor, educators, other staff, volunteers, students and families in your service in relation to sun protection?
- How will you clearly define these roles and expectations and where will it be documented?
- Why are clear and robust procedures for sun protection important for children’s safety and wellbeing?
- How will you learn from the administration of these procedures to improve your practices?
- How will you ensure that the necessary tools are available so the approved provider, nominated supervisor, educators and other staff members can follow the procedures? How will they be made aware of the procedures?
- Do roles and responsibilities reflect the service type?

An example of roles and responsibilities could include, but is not limited to:

Roles	Responsibilities
Approved provider	<ul style="list-style-type: none"> • ensure that obligations under the <i>Education and Care Services National Law</i> and <i>National Regulations</i> are met • take reasonable steps to ensure that the nominated supervisor, educators and staff follow the policy and procedures • centre-based services: ensure adequate shading over areas for both active and passive outdoor play • ensure access to an adequate supply of in-date sunscreen for children, educators and staff • ensure that copies of the policy and procedures are readily accessible to nominated supervisors, coordinators, educators, staff, volunteers and families, and available for inspection • notify families at least 14 days before changing the policy or procedures if the changes will: <ul style="list-style-type: none"> • affect the fees charged or the way they are collected or • significantly impact the service’s education and care of children or • significantly impact the family’s ability to utilise the service.
Nominated supervisor	<ul style="list-style-type: none"> • implement the <i>Sun protection policy</i> and <i>procedures</i>, ensuring all action plans that are in place are carried out • monitor the UVI daily, identify when and how any sun protection changes need to occur, and communicate this to educators and staff • promote sun safe practices with all children, families, educators and staff within the service.
Educators	<ul style="list-style-type: none"> • implement the <i>Sun Protection policy</i> and <i>procedures</i> • monitor the UVI daily and manage outdoor play and learning accordingly • monitor the impact of sun on play equipment and surfaces that children will be touching and using such as soft fall mats, artificial surfacing, etc. • role-model sun safe practices • communicate with families about sun safe practices in general and specific expectations within the service (e.g. wearing protective clothing).
Families	<ul style="list-style-type: none"> • be aware of and follow the service’s <i>Sun protection policy</i> and <i>procedures</i> • send children to the service in appropriate clothing that offers sun protection.

The following table will assist you in developing procedures specific to your service’s needs and context. Referring to the *Education and Care Services National Regulations* when you are writing your procedures will assist you to ensure that you are meeting your obligations.

Areas to include in your procedures	Things to consider and outline in each area (this will be specific to the context of your service)	Strategies for monitoring and implementing procedures	Related policy and/or procedures
<p>Shade requirement</p> <p>Regs: 100, 113, 114, 116, 168</p> <p>QA2: 2.2.1</p> <p>QA3: 3.1, 3.2.1</p> <p>QA7: 7.1.2</p>	<ul style="list-style-type: none"> Identifying the relevant requirements and recommendations for adequate shaded areas for outdoor spaces at your service, FDC educators’ residences or FDC venues, such as recommendations from relevant recognised authorities. How you can maximise children’s outdoor experiences in line with Element 3.2.1, while ensuring shade and other sun protection requirements are met. What should be considered as part of the planning and design process for shade, such as: <ul style="list-style-type: none"> the number of children likely to be using the space climatic and seasonal conditions minimising reflected UVR ensuring supervision without any visual obstruction natural vs. built shade and any safety issues aesthetics. How often a shade audit/risk assessment should be completed, e.g. during the different seasons in the year. How any shade improvements will be actioned and whether short-term solutions can be implemented prior to a long-term fix. Ensuring that risk assessments for excursions consider the availability of adequate shade. 	<ul style="list-style-type: none"> Consult with relevant recognised authorities when planning and designing the shade. Create a checklist to assist with the monitoring and upkeep of the shade. Consider having your shade audited independently. Site visits and risk assessments to ensure adequate shade is available on excursions. 	<p>Providing a child safe environment</p> <p>Excursions</p> <p>Governance and management</p>

Areas to include in your procedures	Things to consider and outline in each area (this will be specific to the context of your service)	Strategies for monitoring and implementing procedures	Related policy and/or procedures
<p>Sun protection and monitoring</p> <p>Regs: 100, 113, 114, 168, 170, 171, 172</p> <p>QA2</p> <p>QA3</p> <p>QA7: 7.1.2</p>	<ul style="list-style-type: none"> • What step-by-step actions are needed to minimise unsafe UVR exposure, e.g. use of shaded areas, appropriate clothing and hats, sunscreen, outdoor play during certain times of the day. • How you will monitor the UVI each day, identify when and how any sun protection changes need to occur, and communicate this to educators and staff. • How will you monitor the impact of sun on play equipment and surfaces that children will be touching and using such as soft fall mats, artificial surfacing, etc. • Ensuring that risk assessments for excursions consider sun protection. • How will you monitor and ensure the children engage in sun safe practices. • Special precautions for children under 12 months of age, such as: <ul style="list-style-type: none"> • keeping them inside during the middle of the day • ensuring they are always completely in the shade • dressing them in protective clothing • avoiding the use of sunscreen for babies aged six months or younger (or as recommended by recognised authorities). 	<ul style="list-style-type: none"> • Make sure your policy and procedures are available for all to access. • Implement systems to ensure regular monitoring of the UVI and sunscreen application. • Implement systems to ensure an adequate supply of in-date sunscreen is available. • Implement systems to ensure the temperature of equipment is regularly monitored. • Ensure procedures are part of educator and staff induction training, and regularly reviewed at meetings. • Add sun protection considerations to your excursions risk assessment template, as well as sun protection actions to your excursions checklist for the day. 	<p>Providing a child safe environment</p> <p>Excursions</p> <p>Staffing</p>
<p>Sun protection awareness, integration into programming and planning</p> <p>Regs: 100, 113, 114, 168</p> <p>QA1</p> <p>QA2</p> <p>QA5</p> <p>QA6: 6.1.3</p>	<ul style="list-style-type: none"> • How educators and staff can role-model and encourage sun safe practices with children and families, e.g. key messages around these practices ('no hat, no play'). • Ways to integrate sun protection awareness into educational programming and planning. • How you will cater for children's agency, reflecting independence and choice within sun safe practices. • How to communicate with families about sun safe practices in general and specific expectations within the service (e.g. wearing sun safe clothing), including considering their cultural backgrounds, beliefs and traditions. 	<ul style="list-style-type: none"> • Consider using images or photos to show sun safe practices. • Family information sessions, noticeboards or library resources that support a healthy lifestyle with sun safe practices. 	<p>Interactions with children</p> <p>Enrolment and orientation</p> <p>Providing a child safe environment</p>

5. Procedures created/reviewed

Include the date the procedures were created or reviewed.

6. Monitoring, evaluation and review

Your service, in consultation with educators and other key staff, families and other stakeholders, should review the effectiveness of these procedures within a set timeframe or earlier if there is a change in relevant legislation.

State when the procedures will be reviewed and who will be responsible for this.

7. Checklist

- Do the **Sun protection procedures** align with your **Sun protection policy**?
- Have your procedures been written in plain English and can they be easily implemented by an educator or staff new to your service?
- Is it clear who is responsible for the implementation of the procedures?
- Are all educators and staff aware of the procedures and can implement them if required?
- Do you need to develop any resources to monitor and record the procedures?

USEFUL RESOURCES

Include links to useful resources that have helped inform the development of your policy. Be mindful of any state or territory specific content.

Some examples include, but are not limited to:

- ACECQA – Babies and outdoor play information sheet acecqa.gov.au/media/27291
- ACECQA – Guide to the National Quality Framework acecqa.gov.au/nqf/about/guide
- ACECQA – Opening a new service acecqa.gov.au/resources/opening-a-new-service
- ACECQA – Risk assessment and management acecqa.gov.au/media/29421
- Cancer Council Australia – Shade for early childhood services cancer council.com.au/wp-content/uploads/2010/11/information-sheet_shadeearlychildhoodservices.pdf
- Cancer Council Australia – Sun protection and babies fact sheet [wiki.cancer.org.au/policy/Position_statement_-_Sun_protection_and_infants_\(0-12_months\)#_ga=2.187296360.1569787799.1540443019-764801331.1538539732](http://wiki.cancer.org.au/policy/Position_statement_-_Sun_protection_and_infants_(0-12_months)#_ga=2.187296360.1569787799.1540443019-764801331.1538539732)
- Cancer Council Australia – SunSmart schools and early childhood programs cancer.org.au/preventing-cancer/sun-protection/sunsmart-schools
- Cancer Council Queensland – Policy Guide: Schools and Early Childhood Protection cancerqld.blob.core.windows.net/resources/quest/19054%20CP_Policy%20Guides_SunProtection_SchoolsandEarlyChildhood_FA.pdf
- Cancer Council Queensland – Sun damage and young children cancerqld.blob.core.windows.net/resources/quest/Sun%20damage%20and%20young%20children_FACTSHEET.pdf
- Cancer Council Victoria – Be SunSmart, Play SunSmart sunsmart.com.au/downloads/schools-early-childhood/be-sunsmart-play-sunsmart.pdf
- Cancer Council Victoria – SunSmart early childhood resources sunsmart.com.au/communities/early-childhood-schools/resources-schools-early-childhood/early-childhood-resources
- Queensland Government – Early childhood sun safety health.qld.gov.au/public-health/schools/sun/early-childhood
- Starting Blocks – Sun protection in child care – what to expect startingblocks.gov.au/other-resources/factsheets/sun-protection-at-child-care