



DAME NELLIE MELBA
KINDERGARTEN
EST 1915

Sun Protection Policy

Mandatory – Quality Area 2



Working in partnership with Cancer Council Victoria, ELAA has aligned this policy to the key policies and guidelines of the Healthy Early Childhood Services Achievement Program



This policy was written in consultation with Cancer Council Victoria's SunSmart Program. The SunSmart Sample Sun Protection Policy and Procedure was last updated in January 2022 and is incorporated into the ELAA policy. This policy is for Victorian Early Childhood Education and Care Services. For more detailed information visit the SunSmart website: <https://www.sunsmart.com.au/advice-for/schools-early-childhood>

PURPOSE

This policy will provide:

- guidelines to ensure children, staff, volunteers and others participating in DNMK programs and activities are well protected from overexposure to ultraviolet (UV) radiation from the sun
- information for parents/guardians, staff, volunteers and children attending DNMK regarding sun protection
- guidance to the use of outdoor spaces including adequate shading.

POLICY STATEMENT

VALUES

DNMK is committed to:

- promoting sun protection strategies for children, families, staff and visitors to minimise the harmful effects of over exposure to the sun's UV radiation
- ensuring that curriculum planning will minimise over exposure to the sun's UV radiation and also promote an awareness of sun protection and sun safe strategies
- providing information to children, staff, volunteers, parents/guardians and others at the service about the harmful effects of exposure to the sun's UV radiation.

SCOPE

This policy applies to the approved provider, persons with management or control, nominated supervisor, persons in day-to-day charge, early childhood teachers, educators, staff, students, volunteers, parents/guardians, children, and others attending the programs and activities of DNMK, including during offsite excursions and activities.

This policy will apply whenever the sun's UV levels reach three or higher. Whenever this occurs a combination of sun protection measures are to be used for all outdoor activities.

In Victoria UV levels are usually three or higher from mid-August to the end of April. Please check the daily local sun protection times (*refer to Definitions*) to be sure you are using sun protection when it is required. Active outdoor play is encouraged throughout the day all year, provided appropriate sun protection measures are used when necessary.

RESPONSIBILITIES	Approved provider and persons with management or control	Nominated supervisor and persons in day-to-day charge	Early childhood teacher, educators and all other staff	Parents/guardians	Contractors, volunteers and students
R indicates legislation requirement, and should not be deleted					
Meeting the standards and requirements of the SunSmart early childhood program	R	√	√		
Ensuring that this policy is up to date with current SunSmart recommendations: www.sunsmart.com.au	R	√			
Ensuring parents/guardians are informed about and agree to support the <i>Sun Protection Policy</i> on enrolment, including the need to provide an appropriate sunhat and clothing for sun protection (<i>refer to Definitions</i>) for their child when attending the service	R	√	√		
Applying sunscreen (<i>refer to Definitions</i>) to their child before the commencement of each session during the times specified in the Scope of this policy				√	
Providing, at their own expense, an alternative sunscreen to be left at the service if their child has a particular sensitivity to the sunscreen provided by the service				√	
Providing a supply of sunscreen for use on all persons to whom this policy applies	R	√			
Obtaining parents/guardians provide an authority for staff to apply sunscreen prior to their child commencing at the service and that this is stored with each child's enrolment record (<i>refer to Definitions</i>)	R	√	√		
Applying sunscreen (<i>refer to Definitions</i>) to children's exposed skin – except in cases where parents/guardians have not given authority. Where possible this should be done 20 minutes before going outdoors. Children, where appropriate, will be encouraged to apply sunscreen with the assistance of an educator (sunscreen is to be reapplied every two hours)		√	√		√
Storing sunscreen in a cool place and monitoring the expiry date – including for sunscreen supplied by parents/guardians		√	√		√
Ensuring each child, and any other participant at the service, wears an appropriate sunhat, clothing for sun protection and sunscreen for all outdoor activities during the times specified in the Scope of this policy	√	√	√		√
Wearing sunhats, clothing for sun protection (<i>refer to Definitions</i>) and sunglasses (optional) when outside, applying sunscreen and seeking shade during the times specified in the Scope of this policy	√	√	√		√

Co-operating with their employer with respect to any action taken by the employer to comply with the <i>Occupational Health and Safety Act 2004</i>		√	√		√
Providing a named, SunSmart approved sunhat (<i>refer to Definitions</i>) for their child's use at the service				√	
Checking that all sunhats brought to the service meet the SunSmart recommendation for adequate protection, are named and stored individually	√	√	√		
Providing appropriate spare sunhats for children and adults that will be laundered after each use	√	√			
Ensuring that children without appropriate sunhats or clothing for sun protection play in the shade or in a suitable area protected from the sun	√	√	√		√
Encouraging children to wear sunhats when travelling to and from the service	√	√	√	√	
Ensuring that program planning includes the application of a combination of sun protection measures for outdoor activities during the times specified in the Scope of this policy	√	√	√		
Ensuring the sun protection times on the SunSmart website or the SunSmart app are accessed daily to assist with the implementation of this policy	√	√	√		√
Ensuring there is adequate shade in the service grounds to protect children from over exposure to UV radiation (<i>Regulation 114</i>)	R	√			
Ensuring that the availability of shade is considered in a risk assessment prior to conducting excursions and other outdoor events (<i>Regulations 100, 101</i>)	R	√	√		
Encouraging children to seek shade when playing outside and utilise shaded areas for outdoor equipment that is not fixed during the times specified in the Scope of this policy		√	√		√
Ensuring that information on sun protection is incorporated into the educational program (<i>refer to the SunSmart website</i>)	√	√	√		
Ensuring that sun protection strategies are a priority when planning excursions	√	√	√		
Reinforcing this policy by providing information on sun protection (available on the SunSmart website) to service users via newsletters, noticeboards, meetings and websites etc	√	√			

BACKGROUND AND LEGISLATION

BACKGROUND

Over exposure to the sun's UV radiation can cause sunburn, skin and eye damage and skin cancer. Australia has one of the highest rates of skin cancer in the world.

Children up to four years of age are particularly vulnerable to UV damage due to lower levels of melanin and a thinner stratum corneum (the outermost layer of skin). UV damage accumulated during childhood and adolescence is associated with an increased risk of skin cancer later in life.

A combination of sun protection measures (hats, clothing, sunscreen, shade and sunglasses) is recommended whenever UV levels are three or higher during daily sun protection times (*refer to Definitions*).

It is a requirement under the *Occupational Health and Safety Act 2004* that employers provide a healthy and safe environment for all persons who access the service's facilities and/or programs.

Legislation that governs the operation of approved children's services is based on the health, safety and welfare of the children and requires that children are protected from hazards and harm.

LEGISLATION AND STANDARDS

Relevant legislation and standards include but are not limited to:

- Child Wellbeing and Safety Act 2005 (Vic) (Part 2: Principles for Children)
- Education and Care Services National Law Act 2010: Section 167
- Education and Care Services National Regulations 2011: including Regulations 100, 101, 113, 114, 168(2)(a)(ii)
- National Quality Standard, Quality Area 2: Children's Health and Safety
- Standard 2.2: Each child is protected
- Element 2.2.1: At all times, reasonable precautions and adequate supervision ensure children are protected from harm and hazard
- Occupational Health and Safety Act 2004

The most current amendments to listed legislation can be found at:

Victorian Legislation – Victorian Law Today: www.legislation.vic.gov.au

Commonwealth Legislation – Federal Register of Legislation: www.legislation.gov.au

DEFINITIONS

The terms defined in this section relate specifically to this policy. For regularly used terms e.g. Approved provider, Nominated supervisor, Notifiable complaints, Serious incidents, Duty of care, etc. refer to the Definitions in Attachment 2

Clothing for sun protection: Clothing that is loose-fitting, made from cool, densely woven fabric and covers as much skin as possible: tops with elbow-length sleeves and, if possible, collars and knee-length or longer shorts and skirts. Singlet tops and shoestring tops/dresses do not provide adequate protection in the sun.

Daily sun protection times: Times when the sun's UV radiation is forecast to be three or higher. Information about the daily sun protection times is available in the weather section of the daily newspaper, on the SunSmart website at: www.sunsmart.com.au, at myuv.com.au, as a free SunSmart app and as a free widget that can be added to websites.

Shade: An area sheltered from direct and indirect sun, such as a large tree, canopy, verandah or artificial cover. Shade can be built, natural or temporary and can reduce overall exposure to the sun's UV by up to 75%. Ensure shade is easily accessible, comfortable, in good condition and regularly maintained. Use surfaces that reflect less UV, e.g. natural, dark or rough surfaces. When combined with appropriate clothing, hats and sunscreen, children can be well protected from UV over exposure when outdoors. Research shows that preschool environments with trees, shrubbery, and broken ground not only provides better sun protection in outdoor play but also triggers more physical activity.

Sunhat: SunSmart advises the use of broad-brimmed or bucket-style hats (at least 5cm brim for young children) or legionnaire hats (make sure the front peak and back flap overlap at the sides) that shade the face, neck and ears. Caps and visors offer little protection to the cheeks, ears and neck, and are not considered a suitable alternative and should be swapped for a UV-protective hat

Sunglasses: Sunglasses are optional. If worn, it is recommended that glasses are a close fitting, wrap-around style that meet the *Australian Standard 1067 (Sunglasses: Category 2, 3 or 4)* and cover as much of the eye area as possible. Wearing a hat with a brim that shades the eyes can also reduce UV radiation to the eyes by 50%.

Sunscreen: SPF 30 (or higher) broad-spectrum, water-resistant sunscreen. Sunscreen should be reapplied every two hours, even when labelled 4 hours water resistance. Make sure the sunscreen has an Australian Licence (Aust L) number and monitor the expiry date. Store it in a supervised, cool, dry place out of direct sun. Cancer Council recommends a [usage test](#) before applying a new sunscreen. From 3 years of age, children are encouraged to apply their own sunscreen under supervision of staff to help develop independent skills ready for school.

SunSmart: The name of the program conducted by Cancer Council to help prevent skin cancer: www.sunsmart.com.au

SOURCES AND RELATED POLICIES

SOURCES

- AS/NZS 4685.0:2017, Playground equipment and surfacing - Development, installation, inspection, maintenance and operation.6.2.1 *General considerations*, 6.3.9 *Shade and sun protection*, Appendix A *Shade and sun protection*
- Safe Work Australia: [Guide on exposure to solar ultraviolet radiation \(UVR\)](#) (2019)
- Cancer Council Australia: www.cancer.org.au/sunsmart
- *Get Up & Grow: Healthy eating and physical activity for early childhood*. Department of Health resources. Particularly Section 2 of the Director/Coordinator Book and the Staff Book: <http://www.health.gov.au/internet/main/publishing.nsf/Content/phd-early-childhood-nutrition-resources>
- SunSmart: www.sunsmart.com.au
- Victorian Institute of Teaching (VIT) [The Victorian Teaching Profession Code of Conduct](#) - Principle 3.2
- [Australian Professional Standards for Teachers](#) (APST) – Standard 4.4 and 7.2
- ARPANSA [Radiation Protection Standard for Occupational Exposure to Ultraviolet Radiation](#) (2006)
- [Belonging, Being and Becoming – The Early Years Learning Framework](#) (July 2009)
- [Victorian Early Years Learning and Development Framework](#) (VEYLDF) (May 2016)
- Victorian School Building Authority (VSBA) [Building Quality Standards Handbook \(BQSH\)](#): Section 5.1.3, 5.1.4 Shade Areas (May 2021)
- AS 4174:2018 Knitted and woven shade fabrics
- AS/NZS 1067.1:2016, Eye and face protection - Sunglasses and fashion spectacles
- AS 4399:2020, Sun protective clothing – Evaluation and classification
- AS/NZS 2604:2012 Sunscreen products - Evaluation and classification
- Australian Government Therapeutics Goods Administration (TGA) – Australian regulatory guidelines for sunscreens: [4. Labelling and advertising – directions for use of the product](#)

RELATED POLICIES

- Child Safe Environment and Wellbeing
 - Excursions and Service Events
 - Nutrition, Oral Health and Active Play
 - Occupational Health and Safety
 - Supervision of Children
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EVALUATION

In order to assess whether the values and purposes of the policy have been achieved, the approved provider will:

- regularly seek feedback from educators, staff, parents/guardians, children, management and all affected by the policy regarding its effectiveness
 - monitor the implementation, compliance, complaints and incidents in relation to this policy
 - keep the policy up to date with current legislation, research, policy and best practice
 - revise the policy and procedures as part of the service's policy review cycle, or as required
 - notifying all stakeholders affected by this policy at least 14 days before making any significant changes to this policy or its procedures, unless a lesser period is necessary due to risk (*Regulation 172 (2)*).
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ATTACHMENTS

- Attachment 1: Authority for staff to administer provided sunscreen
 - Attachment 2: General Definitions
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AUTHORISATION

This policy was adopted by the approved provider of DNMK on Oct 2022

REVIEW DATE: Oct 2024

ATTACHMENT 1. AUTHORITY FOR STAFF TO ADMINISTER SUNSCREEN

Authority for staff to administer sunscreen provided by the parent/guardian

I, _____, give permission for the staff at [Service Name] to apply, as appropriate, to all exposed parts of my child's body the sunscreen that I have supplied and labelled with my child/children's name. This sunscreen is an SPF 30 (or higher) broad-spectrum, water-resistant sunscreen. I understand that this sunscreen will be kept at the service.

It is my responsibility to ensure there is always an adequate supply of this sunscreen at the service.

(Name of child)

Signature (parent/guardian)

Date

Attachment 1

General Policy Definitions

Approved Provider: An individual or organisation that has completed an application and been approved by the Regulatory Authority as fit and proper (in accordance with Sections 12, 13 and 14 of the National Law) to operate one or more education and care services. Where the applicant is an organisation, each person with management and control (see definition below) of that organisation must complete a separate application form. (Note: Under the Education and Care Services National Law Act 2010, Section 5, Definitions: "person with management or control, in relation to an education and care service, means – (b) if the provider of the service is an eligible association, each member of the executive committee of the association who has the responsibility, alone or with others, for managing the delivery of the education and care service".)

Australian Children's Education and Care Quality Authority (ACECQA): The national authority established to oversee the National Quality Framework and guide its implementation in a consistent way throughout Australia.

Department of Education and Training (DET): The Victorian State Government department with Primary responsibility for the approval, monitoring and quality assessment of services in Victoria in accordance with the national legislative framework and in relation to the *National Quality Standards*

Early childhood teacher: A person with an approved early childhood teaching qualification as listed on the ACECQA website www.acecqa.gov.au

Educational Leader: The Approved Provider of an education and care service must designate, in writing, a suitably qualified and experienced educator, coordinator or other individual to lead the development and implementation of education programs at the service (Regulation 118). This person must have a thorough understanding of the Early Years Learning Framework (or other approved learning framework), be able to guide other educators in their planning and reflection, and mentor colleagues in their implementation practices.

Educator: An individual who is qualified to provide education and care for children as part of an education and care service.

Learning frameworks: Under the National Quality Framework (NQF), education and care services are required to ensure that the program delivered to all children being cared for and educated by the

service is based on and delivered in a manner that accords with an approved learning framework. In Victoria, the approved frameworks are:

- ☐ *Early Years Learning Framework (EYLF)*
- ☐ *Victorian Early Years Learning and Development Framework (VEYLDF)*
- ☐ *My Time, Our Place: Framework for School Age Care in Australia.*

National Law: Refers to the *Education and Care Services National Law Act 2010*: the national law regulating education and care services for children.

National Quality Framework (NQF): This framework for the early childhood education and care sector helps providers to improve the quality of services in areas that impact on a child's development. The framework includes:

- ☐ a National Law – the Education and Care Services National Law Act 2010
- ☐ National Regulations – the Education and Care Services National Regulations 2011 (please check online to ensure the most current version is being used)

☐ the National Quality Standard

☐ an assessment and rating system

☐ a Regulatory Authority in each state and territory with primary responsibility for the approval, monitoring and quality assessment of services in their jurisdiction in accordance with the national legislative framework and in relation to the National Quality Standard

☐ the Australian Children's Education and Care Quality Authority (ACECQA). The national body responsible for providing oversight of the system and ensuring consistency of approach.

National Quality Standard (NQS): The NQS sets a National benchmark for the quality of children's education and care services. The NQS is comprised of guiding principles, quality areas, standards and elements. There are seven quality areas which capture aspects critical to the provision of quality education and care.

National Regulations: Refers to the *Education and Care Services National Regulations 2011*: the regulations or rules under which education and care services must operate. The regulations are the way in which the law is applied.

Nominated Supervisor: A person who has been nominated by the Approved Provider of the service under Part 3 of the Act and who has consented to that nomination in writing can be the Nominated Supervisor. All services must have a Nominated Supervisor with responsibility for the service in accordance with the National Regulations. The Approved Provider must take reasonable steps to ensure that the Nominated Supervisor is a fit and proper person (in accordance with Sections 12, 13 and 14 of the National Law), with suitable skills, qualifications and experience. The Regulatory Authority must be notified if the Nominated Supervisor for the service changes, or is no longer employed at the service.

Person with management or control: Means— (a) if the provider or intended provider of the service is a body corporate, an officer of the body corporate within the meaning of the Corporations Act 2001 of the Commonwealth who is responsible for managing the delivery of the education and care service; or (b) if the provider of the service is an eligible association, each member of the executive committee of the association who has the responsibility, alone or with others, for managing the delivery of the education and care service; or (c) if the provider of the service is a partnership, each partner who has the responsibility, alone or with others, for managing the delivery of the education and care service; or (d) in any other case, a person who has the responsibility, alone or with others, for managing the delivery of the education and care service (Note: Under the *Education and Care Services National Law Act 2010*, Section 5).

Person in day-to-day charge: A person is in day-to-day charge if (a) the person is placed in day-to-day charge by the approved provider or a nominated supervisor of the education and care service after meeting the definition for a service supervisor certificate: and (b) the person consents to the placement in writing (Regulation 54)

Policy: A formal statement of principles which provides a framework for decision-making and indicates the course of action to be taken in specific circumstances. Policies provide services with an approved way of operating in relation to particular matters and improve the management of risk. They reflect the values and beliefs of a service, current thinking, national standards and community expectations, and are relevant in terms of current laws and regulations.

Procedures: The steps required to implement and comply with a policy. Procedures specify how to achieve the necessary result by outlining who does what and when. Procedures are succinct, factual and to the point, and are generally expressed as a list.

Program: The group/activity in which a child is enrolled and which has specific hours of attendance.

Regulatory Authority: see definition for the Department of Education and Training.

Responsible Person: The Approved Provider (if that person is an individual, and in any other case the person with management or control of the service operated by the Approved Provider) or a Nominated Supervisor or person who has been placed in day-to-day charge of the service in accordance with the National Regulations.

Service Supervisor Certificates: On 1st November 2016 the National Regulations were amended to expand the classes of people who may be covered by a prescribed class supervisor certificate.

The new prescribed classes are set out in regulation 238A, and include a person who is:

- ☐ *responsible for day to day management of the service, or*
- ☐ *exercising supervisory and leadership responsibilities for part of the service, or*
- ☐ *a family day care coordinator*

Certificates issued for people working in one of these roles are referred to as “*service supervisor certificates*”.

Service supervisor certificates will not be issued to a particular person. Instead they may apply to any person working at the service who has been identified by the approved provider as working in one of the above roles.

For example, if the service director is responsible for day to day management of the service, they can be covered under the service supervisor certificate. Similarly, a room leader who is responsible for supervising part of the service can also be covered by the service supervisor certificate.

With this new flexibility, most individuals do not need to apply to the regulatory authority for a supervisor certificate.

Under these arrangements, a person is covered under the service supervisor certificate and may be a nominated supervisor if:

- ☐ the approved provider identifies that they meet the definition for a service supervisor certificate and
- ☐ they give their written consent to be the nominated supervisor (required under sections 35, 44 and regulation 56).

Nominated supervisors have specific obligations under the National Law (See Nominated Supervisors above).

A person is covered and may be placed in day to day charge of the service if:

- ☐ the approved provider or the nominated supervisor identifies that they meet the definition for a service supervisor certificate and
- ☐ they give their written consent to be placed in day to day charge of the service (required under regulation 54).

These arrangements apply for centre based and family day care services, and make it easier for providers to meet the requirements to ensure that:

- ☐ for centre based services, either the approved provider, nominated supervisor or certified supervisor in day to day charge is present at the service at all times the service is educating and caring for children (section 162) and
- ☐ for family day care services, either the approved provider, nominated supervisor or a certified supervisor in day to day charge is available at all times to support family day care educators

Staff: Any individual (other than the Nominated Supervisor or a volunteer) employed, appointed or engaged to work in or as part of an education and care service.