

Sun Protection Policy

Version	Final
NQF Requirements	Quality Area 2 – Mandatory
Approved by Committee of Management	27/03/2025
Next Review Date	2027

Purpose

This policy will provide:

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

Policy Statement

Values

Highgate Early Learning Centre 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 Highgate Early Learning Centre, including during offsite excursions and activities.

This policy will apply during the daily local sun protection times or 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.

Our *Sun Protection Policy* considers the [special needs of infants](#). All babies under 12 months are kept out of direct sun when UV levels are 3 or higher. Our service acknowledges that the best sun protection can be achieved when a combination of physical sun protection measures such as shade, clothing and hats are used. For those small areas of exposed skin not protected by clothing or hats, we apply approved sunscreen to infants six months and older.



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					
Ensuring that obligations under the <i>Education and Care Services National Law</i> and <i>National Regulations</i> are met	R	R			
Taking reasonable steps to ensure that all staff follow the sun protection policy and procedures	R	√			
Ensuring that copies of the <i>Sun Protection Policy</i> is readily accessible and available to all staff, volunteers and families	R	√			
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	√			
Monitoring the daily sun protection times for the service location and manage sun safe outdoor play and learning accordingly		√	√		√
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 sun protective hat (<i>refer to Definition</i>) and sun protective clothing (<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 sun protection times (<i>refer to Definitions</i>)				√	
Providing, at their own expense, an alternative sunscreen (<i>refer to Definitions</i>) that meets our sunscreen requirements, 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	√			
Ensuring parents/guardians provide an authority for staff to apply sunscreen prior to their child commencing at the service (<i>refer to Attachment 1</i>) 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		√	√		√



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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		√	√		√
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, sun protective hat (<i>refer to Definitions</i>) for their child's use at the service				√	
Checking that all sun protective hats (<i>refer to Definitions</i>) brought to the service meet the SunSmart recommendation for adequate protection, are named and are stored individually	√	√	√		
Providing appropriate spare sun protective hats (<i>refer to Definitions</i>) for children and adults that will be laundered after each use	√	√			
Ensuring that children without appropriate sun protective hats (<i>refer to Definitions</i>) or sun protective clothing (<i>refer to Definitions</i>) play in the shade or in a suitable area protected from the sun	√	√	√		√
Encouraging children to wear sun protective hats (<i>refer to Definitions</i>) 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 sun protection times (<i>refer to Definitions</i>)	√	√	√		
Ensuring the sun protection times (<i>refer to Definitions</i>) on the SunSmart website or the SunSmart app are accessed daily to assist with the implementation of this policy	√	√	√		√
Ensuring there is adequate shade over areas for both active and passive outdoor play at 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 sun protection times (<i>refer to Definitions</i>)		√	√		√



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Ensuring that information on sun protection is incorporated into the educational program (<i>refer to the SunSmart website</i>)	√	√	√		
Monitoring, and where practical, adjusting outdoor learning and play experiences to minimise direct and indirect UV exposure, especially when the UV index is extreme (11 and above)		√	√		√
Ensuring that sun protection strategies are a priority when planning excursions	√	√	√		
Ensuring all staff are aware of the special needs of infants. Babies under 12 months should not be exposed to direct sun. They should remain in full shade and always be well-protected through the use of hats and cool, covering clothing when outside. With parental consent small amounts of a suitable SPF30 (or higher) broad-spectrum water-resistant sunscreen may be applied to babies over 6 months (delete if not applicable)	√	√	√		√
Communicating with families about SunSmart practices in general and specific expectations within the service (e.g., wearing protective clothing, sun protective hat styles)	√	√	√		√
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.

Young children 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 (the daily sun protection times) (*refer to Definitions*).

The sun's UV can't be seen or felt. Whatever the temperature or weather, it's important for people of all skin types to use sun protection whenever UV levels are three or higher.

Too much of the sun's UV can cause sunburn, skin and eye damage and skin cancer. Australia has one of the highest rates of skin cancer in the world. More than two in three Australians will be diagnosed with skin cancer in their lifetime.

By teaching sensible sun protection habits from an early age and implementing sun protection measures, early childhood services can play a significant role in reducing skin cancer risk.

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)
- Education and Care Services National Law Act 2010: Section 167
- Education and Care Services National Regulations 2011
- National Quality Standard, Quality Area 2: Children's Health and Safety
- Occupational Health and Safety Act 2024

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 *General Definitions* schedule attached.

Shade: Well-designed and positioned [shade](#) can significantly reduce direct and indirect UV exposure and create cool, comfortable spaces for outdoor learning and play. Shade can be natural (trees, shrubs or shadow cast from nearby buildings), built (pergola, shade sails, etc.), portable (shade umbrellas, marquees, etc.) or a combination of these. Ensure shade is easily accessible, aesthetically pleasing, in good condition and regularly maintained. Use surfaces that reflect less UV, e.g., natural, dark or rough surfaces such as grass, soil and tanbark. When combined with appropriate clothing, hats and sunscreen, children can be well protected from UV when outdoors. Research shows that early childhood service environments with trees, shrubbery, and broken ground not only provides better sun protection in outdoor play but also triggers more physical activity. An area sheltered from direct and indirect sun, such as a large tree, canopy, verandah or artificial cover.

Sun protection times: The sun protection times are a forecast from the [Bureau of Meteorology](#) for the times of the day when UV levels are forecast to be 3 and above. At these levels there is a risk of skin damage for all skin types. In Victoria, UV levels regularly reach 3 and above from mid-August to the end of April. You can find the sun protection times for your location on the free SunSmart Global UV [widget](#) or [app](#), at [sunsmart.com.au](#), at [myuv.com.au](#) or in the weather section of the daily newspaper.

Sun protective clothing: If you can see skin, UV can reach it. [Clothing](#) can be a great barrier between the sun's UV and your skin. Cover as much skin as possible with cool, loose-fitting clothing made from densely woven fabric like cotton. This includes tops that cover the chest, shoulders and arms, with elbow length sleeves and collars and longer style shorts or skirts. If a child is wearing a singlet top or dress with thin straps, they must add a t-shirt or shirt before outdoor play. Singlet tops and shoestring tops/dresses do not provide adequate protection in the sun.

Sun protective hat: A [hat](#) should shade the face, neck and ears and cover the crown of the head, such as a wide-brimmed or bucket hat (at least 5cm brim for young children) or legionnaire hat (make sure the front peak and back flap overlap at the sides). Caps and visors offer little protection to the crown of the head, cheeks, ears and neck, and are not considered a suitable alternative and should be swapped for a sun 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 up to 50%.

Sunscreen: [Sunscreen](#) should be labelled SPF30, SPF50 or SPF50+ and be broad-spectrum and water-resistant. For all children over 6 months, apply sunscreen to any skin not protected by clothing 20 minutes before going outdoors and reapply every two hours or more frequently if sweating, towel drying or after water activities. Make sure it has an Australian Licence (Aust L) number and monitor the expiry date. Store sunscreen below 30 degrees, in a supervised location and out of direct sun. Cancer Council recommends a [usage test](#) before applying a new sunscreen. The widespread use of sunscreen on babies under 6 months old is not recommended. 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](#)



Definitions *(continued)*

Ultraviolet (UV) radiation: [Ultraviolet \(UV\) radiation](#) is a type of energy produced by the sun and some artificial sources, such as arc welders and solariums. The sun's UV is the main cause of skin cancer. Too much UV exposure also causes sunburn, tanning, premature ageing, and eye damage. You can see the sun's light, you can feel the sun's heat, but you can't see or feel the sun's UV radiation. UV can reach you directly from the sun. It can also be reflected off different surfaces and scattered by particles in the air. Your senses cannot detect UV radiation, so you won't notice it is all around you and you won't immediately notice any damage.

UV Index: The World Health Organization's Global Solar UV Index measures UV levels on a scale from 0 (Low) to 11+ (Extreme). Sun protection is recommended whenever UV levels are 3 (Moderate) or higher. The UV level is affected by a number of factors including the time of day, time of year, cloud cover, altitude, location and surrounding surfaces. www.who.int



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: www.health.gov.au
- 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
- Australian Radiation Protection and Nuclear Safety Agency: [Radiation Protection Standard for Occupational Exposure to Ultraviolet Radiation](#) (2006)
- Belonging, Being & Becoming – The Early Years Learning Framework for Australia (EYLF): www.acecqa.gov.au
- Victorian Early Years Learning and Development Framework (VEYLDF): www.acecqa.gov.au
- AS 4174:2018 (Amd 2019) Knitted and woven shade fabrics
- AS/NZS 1067.1:2016 (Amd 2021), Eye and face protection - Sunglasses and fashion spectacles
- AS 4399:2020, Sun protective clothing – Evaluation and classification
- AS/NZS 2604:2021 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
- Enrolment and Orientation
- Excursions and Service Events
- Interactions with children
- Nutrition, Oral Health and Active Play
- Occupational Health and Safety
- Supervision of Children



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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Acknowledgements

This policy is based on the ELAA Sun Protection Policy which was last updated in March 2024.

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

The ELAA policy was written in consultation with Cancer Council Victoria's SunSmart Program. The SunSmart Sample Sun Protection Policy and Procedure was last updated in August 2023 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>