Senate Committee Inquiry: The immediate future of the childcare sector in Australia

c. the current regulatory environment and the impact on children, educators and service operators

Summary

Cancer Council's SunSmart fully supports the Education and Care Services National Regulations and quality outcomes relating to the physical environment (Part 4.3, Divisions 1 and 2) and leadership and service management policies and procedures (Part 4.7, Division 2).

Regulations 113, 114 and 168 confirm sun protection as a health priority for all Australian ECEC services and guarantee procedures are in place to minimise skin cancer risk and help with vitamin D. They provide an authoritative mandate to educators and service operators that sun protection and sun safe environments must be taken seriously and are not just optional requirements.

These regulations support all current evidence on skin cancer prevention and are vital for ECEC services to have an impact on reducing children's risk of skin and eye damage and skin cancer. They also support Occupational Health and Safety guidelines for staff.

Background information

Australia has one of the highest skin cancer incidence and mortality rates in the world. More than 2000 Australians died from skin cancer in 2011.[i] At least two in three Australians will be diagnosed with skin cancer before the age of 70[ii] and over 2000 Australians are treated for skin cancer each day.[iii]

Exposure to the sun's ultraviolet (UV) radiation during childhood and adolescence is associated with an increased risk of skin cancer in later life.[iv,v] Infants and toddlers (up to 4 years of age) are particularly vulnerable to UV radiation-induced changes in the skin due to lower levels of melanin and a thinner stratum corneum, the outermost layer of skin.[vi]

Australian adolescents have by far the highest incidence of malignant melanoma in the world, compared with adolescents in other countries.[vii] In young people aged 12-24 years in Australia, melanoma is the most common cancer, with more than double the number of cases of any other kind of cancer.[viii]

Early Childhood Education and Care (ECEC) services can play an integral role in the reduction of future skin cancer rates given:

- significant UV exposure occurs during childhood and adolescence,
- children attend services during times of peak ultraviolet radiation (UV) levels,
- services can play a significant role by creating sun safe environments and influencing behaviors through education and role modeling.

The SunSmart Early Childhood Program is a national non–mandatory membership program promoting sun–safe practices in early childhood services to minimise skin and eye damage and skin cancer risk and help with vitamin D. It supports each member service with policy and program advice, learning and development resources, educator and family information and guidelines to encourage a healthy UV exposure balance. Currently 69% of ECEC services across Australia are registered members.

In May 2013 the Community Preventive Services Taskforce Review recommended there is sufficient evidence that childcare centre-based skin cancer prevention interventions that include implementation of sun protection policies along with education of staff and parents increase children's protection from excessive UV exposure.[ix]

Education and Care Services National Regulations 2011

The introduction of the Education and Care Services National Regulations ensured sun protection was a mandatory requirement for all ECEC services across Australia.

Regulation 168 (2) (a) (ii) requires services to have policies and procedures relating to sun protection. In a recent survey of national ECEC services, most (96%) reported they had a written sun protection policy[x]. The regulations ensure a policy is in place. Prior to regulations in 2008, 9% of non-SunSmart services surveyed did not have a sun protection policy[xi] compared with 6% of non-SunSmart member services in 2013.[xii] The SunSmart Program can support regulatory requirements by providing expertise on policy content and advice on evidence-based practices.

Regulation 114 requires all services to have outdoor spaces which include adequate shaded areas to protect children from overexposure to ultraviolet radiation from the sun. Shade alone can reduce overall exposure to the sun's UV by up to 75%.[xiii] When combined with appropriate clothing, hats and sunscreen, children can be well protected from UV overexposure when outdoors. According to national survey results 78% of ECEC services reported there was enough shade at their service for all children to play outside, up from 74% in 2008.[xiv] With all registered ECEC services operating under the same national regulations, we can expect to see an increase in reported levels of shade across this sector in keeping with regulatory requirements.

Further, given research shows that spacious preschool environments with trees, shrubbery, and broken ground not only triggers more physical activity but also provides better sun protection in outdoor play[xv], Regulation 113 requiring outdoor spaces that allow children to explore and experience the natural environment is also relevant. In 2013 almost two-thirds (61%) of national

ECEC services had evergreen trees providing shade in the outdoor space and 46% had deciduous trees for shade. [xvi] These regulations will hopefully result in an increase in natural shade from trees.

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[xiii] Parsons PG, Neale R, Wolski P, Green A. The shady side of solar protection. *Medical Journal of Australia* 1998; 168(7): 327-30.
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