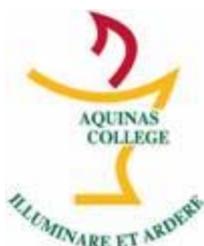




**The Cancer Council Victoria's
SunSmart Program's response to the
Education and Training Committees inquiry
into dress codes and school uniforms
in Victorian schools.**



Mr Geoff Howard, MP
Chair
Education and Training Committee
Parliament House
Spring Street
East Melbourne 3002

Dear Mr Howard,

Thank you for the opportunity to comment in relation to your inquiry into dress codes and school uniforms in Victorian schools. The Cancer Council Victoria would like our submission to be considered in relation to the following terms of reference:

Matters which need to be considered to ensure dress codes and uniform policies are consistent with anti-discrimination legislation and health promotion policies.

In summary, skin cancer is a significant public health problem in Victoria and Australia. Australia has the highest rate of skin cancer in the world with 1 in 2 people developing skin cancer at some time in their lives. Adolescence and childhood are critical periods during which sun exposure is likely to contribute to skin cancer later in life.

To protect Victorian students from the harmful effects of ultraviolet (UV) radiation, SunSmart, a skin cancer prevention program of The Cancer Council Victoria, recommends that school uniform/dress code policies include the following minimum standards:

- Clothing (including sports uniforms) that covers as much of the students' skin as practical
- A sun protective hat

To support this recommendation, please find attached our detailed submission.

Yours sincerely,



David Hill, Director
The Cancer Council Victoria



Kylie Strong, SunSmart Program Manager
The Cancer Council Victoria



Todd Harper, CEO
VicHealth

Members of the SunSmart Secondary School Advisory Group:



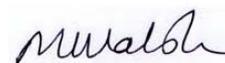
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Summary: SunSmart's recommendations

Adolescence and childhood are critical periods during which sun exposure is likely to contribute to skin cancer later in life.^{1,2,3} Schools have a duty of care to ensure that their students are protected against foreseeable harm. Sunburn and skin cancer are foreseeable outcomes of overexposure to the sun. The damage done to the skin from even one episode of overexposure to the sun can never be repaired.⁴ Well-designed, sun-protective clothing offers students effective and reliable protection from the sun's UV rays.

SunSmart therefore recommends that school uniform/dress code policies include the following minimum standards:

1. Clothing (including sports uniform) that covers as much of the students' skin as practical.

The most important factor which should be reflected in school uniform/dress code policies relates to the style or design of clothing.

Examples:

Summer uniform/dress code

- A shirt with at least elbow-length sleeves (although $\frac{3}{4}$ length sleeves provide better protection from the sun).
- Collar that sits close to the neck, above the collarbone. Scoop necks, v-necks or any other necklines below the collarbone are not recommended.
- Longer style skirts/shorts/pants at least to the knee (although $\frac{3}{4}$ length shorts/pants provide better protection from the sun).

Sports uniform/dress code

Note: *The need for sun protection must be balanced with the practicalities of playing sport, and we have tried to reflect this in the following recommendations:*

- A shirt that covers the shoulders well. Tanks tops are not recommended.
- Collar that sits close to the neck, above the collarbone. Scoop necks, v-necks or any other necklines below the collarbone are not recommended.
- Longer style skirts/shorts/pants at least to the mid-thigh (although knee-length skirts/shorts/pants provide better protection from the sun).
- Rash vests or t-shirts for outdoor swimming.

2. A sun protective hat:

Summer hat (to be worn September-April)

SunSmart recommends the following hats as research shows they offer the best protection from UV radiation:

- Broad brimmed hats - with a brim of at least 7.5 cm.
- Bucket or 'surfie-style hats' - with a deep crown and brim of at least 6 cm.
- Legionnaire hats, which have a flap that covers the neck. The side flap and front peak should meet to provide protection to the side of the face.

Sport/PE hat

As above.

Note: *Schools may need to consider including baseball caps as part of their sports uniform where a sun protective hat may restrict vision or be unsafe for particular sports.*

1. The case for sun-protective school uniforms/dress codes

1.1 Research on the importance of sun protection, particularly during childhood and adolescence.

UV radiation from the sun and other sources is a known human carcinogen.⁵ Adolescence and childhood are critical periods during which sun exposure is more likely to contribute to skin cancer later in life.^{1,2,3} It is estimated that more than 75% of all skin cancers could be prevented by practising sun protection in childhood and adolescence.⁶ This has been attributed to both the sensitivity of skin to sunlight and high exposure to UV radiation during childhood and adolescence. (Around 25% of lifetime exposure occurs by the age of 21.^{7,8})

Skin cancer is a significant public health problem in Victoria and Australia. Australia has the highest rate of skin cancer in the world with 1 in 2 people developing skin cancer at some time in their lives.⁹ Current figures show that each year 374,000 Australians are diagnosed with non-melanoma skin cancer⁹ and over 8,500 people with melanoma.¹⁰ Our rates are at epidemic levels with over 1,500 Australians losing their lives to skin cancer each year.¹¹

Melanoma can develop early in life and the risk increases, as you get older. In those aged 15–44 years, melanoma and breast cancer are the most common cancers.¹⁰

If we reduce UV radiation exposure, we can also reduce skin cancer rates as most skin cancer can be prevented. We therefore recommend that sun protection be a very important consideration in Victorian school uniform/dress code policies.

1.2 Schools' duty of care to protect students against foreseeable harm.

Schools have a duty of care to ensure that their students are protected against foreseeable harm. Sunburn is a foreseeable outcome of exposure to the sun. Sunburn can range from mild or first degree burns through to third degree burns, which require medical attention. Other skin damage may not always be immediately evident. Sun exposure is the cause of around 99% of non-melanoma skin cancers and 95% of melanoma in Australia.^{1,12} Sun exposure prior to 20 years of age is more closely associated with melanoma risk than sun exposure after 30 years of age.¹³ The damage done to the skin from even one episode of overexposure to the sun can never be repaired.⁴

Ensuring that the school uniform/dress code policy includes sun-protective clothing is one of the ways schools can help protect their students from the possible 'harm' caused by overexposure to the sun.

1.3 Well designed clothing offers an excellent method of protection from the sun's UV rays.

Clothing is an effective and reliable source of protection against solar UV radiation, provided the garment exhibits good coverage of the skin and the fabric prevents most of the incident UV radiation from reaching the skin.

National laboratories in Australia and the UK have determined UPFs (ultraviolet protection factor) on several thousand summer-weight clothing fabrics with the following results:^{14,15}

- Almost 90% of summer clothing has UPFs > 10 and, in practice, provides equivalent protection to sunscreens of SPF 30 or higher.

- 80% of summer clothing has UPFs > 15 and under normal exposure patterns will offer virtually complete protection.

Sun protective clothing is generally a better form of sun protection than sunscreen. Sunscreens do not block out all of the UV radiation reaching the skin so people are not completely protected. SPF 30+ sunscreen filters out approximately 97% of UV radiation if applied properly. However, research has shown that many Australians apply too little sunscreen, which means they usually get less than half the protection stated on the product label.¹⁶ In addition, sunscreen can be easily wiped or perspired off and needs to be reapplied every 2 hours for it to be most effective. Clothing, on the other hand, does not suffer from the uncertainties of sunscreen application.

It is vitally important that the uniform/dress code policy offers strict guidelines particularly regarding appropriate sports uniform (see recommendations over page). This is because students spend long periods outside playing sport and participating in Physical Education classes often when UV radiation is most intense. In addition, it is often not practicable to shade sporting arenas (eg netball/tennis courts). Victorian students are most at risk during all day outdoor sporting carnivals held between September and April.

Wearing sunglasses is optional for members of the SunSmart Schools Program. Schools need to make their own decision, by weighing up the health benefits with the practicalities and cost of introducing sunglasses. If schools decide to introduce sunglasses, SunSmart recommends wearing close fitting, wrap around sunglasses that cover as much of the eye as possible. The sunglasses should meet Australian Standard 1067 (Sunglasses: Category 2, 3 or 4) and preferably be marked EPF (Eye Protection Factor) 10.

2. SunSmart's recommendations regarding school uniform/dress code policies in Victorian schools

SunSmart recommends that school uniform/dress code policies include the following minimum standards:

First recommendation: Clothing (including sports uniforms) that covers as much of the students' skin as practical.

The most important factor which should be reflected in school uniform/dress code policies relates to the style or design of clothing.

Examples:

Summer uniform/dress code

- A shirt with at least elbow-length sleeves (although $\frac{3}{4}$ length sleeves provide better protection from the sun).
- Collar that sits close to the neck, above the collarbone. Scoop necks, v-necks or any other necklines below the collarbone are not recommended.
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Sports uniform/dress code

Note: *the need for sun protection must be balanced with the practicalities of playing sport, and we have tried to reflect this in the following recommendations:*

- A shirt that covers the shoulders well. Tanks tops are not recommended.
- Collar that sits close to the neck, above the collarbone. Scoop necks, v-necks or any other necklines below the collarbone are not recommended.
- Longer style skirts/shorts/pants at least to the mid-thigh (although knee - length skirts/shorts/pants provide better protection from the sun).
- Rash vests or t-shirts for outdoor swimming.

Further information about clothing

Apart from style/design, there are other factors that determine how effective garments are at reducing UV radiation.

- **UPF (ultraviolet protective factor)**

Clothes especially designed for sun protection will carry a UPF (Ultraviolet Protection Factor) level on their tags. The higher the number, the greater the protection from UV radiation.

The UPF rating doesn't refer to the design of the garment, just its material. Any fabric rated above UPF 30 provides good protection against UV radiation, but UPF 50+ is recommended.

Fabrics that don't carry a UPF rating don't necessarily offer less protection than those that have not been tested, but the rating system provides added assurance.

UPF rating	% UV radiation absorbed	Protection category
10	90.0	moderate
15	93.3	good
20	95.0	good
30	96.7	very good
40	97.5	excellent
50	98.0	excellent

(Source: Australian Radiation Protection And Nuclear Safety Agency 2003)

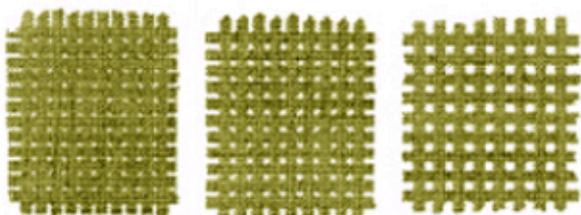
- **Composition**

Different fabrics absorb different amounts of UV radiation. Most cotton or cotton/polyester blend fabrics provide protection equal to about UPF 20 (which is about 95% protection from UV radiation).

Keeping cool is also important. Fabrics are now available that are lightweight and cool, yet still provide maximum sun protection. In the heat it is important that garments draw perspiration away from the body to help the body stay cool.

- **Weave density**

The closer the fabric's weave, the higher the UV radiation protection. Because the fibres of tightly woven fabrics are closer together, less UV radiation is able to pass through to the skin.



High UPF Moderate UPF Low UPF

(Source: Australian Radiation Protection And Nuclear Safety Agency website)

Loose fitting clothes give better protection than close-fitting clothes and may be more comfortable to wear on hot days.

- **Colour**

Darker colours (black, navy, dark red) of the same fabric type will absorb more UV radiation than light pastel shades. They will therefore have a higher UPF rating.

Second recommendation: A sun protective hat.

Summer hat (to be worn September-April)

SunSmart recommends the following hats as research shows they offer the best protection from UV radiation:

- Broad brimmed hats - with a brim of at least 7.5 cm.
- Bucket or 'surfie-style hats' - with a deep crown and brim of at least 6 cm.
- Legionnaire hats, which have a flap that covers the neck. The side flap and front peak should meet to provide protection to the side of the face.

Sport/PE hat

As above.

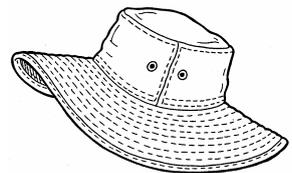
Note: schools may need to consider including baseball caps as part of their sports uniform where a sun protective hat may restrict vision or be unsafe for particular sports.

Further information about hats

SunSmart recommends hats that provide good shade to the face, back of the neck, eyes and ears when in the sun. Research shows that broad-brimmed, bucket and legionnaire hats provide satisfactory UV radiation protection. Baseball caps do not provide UV protection to the head and face and are therefore not recommended.¹⁷

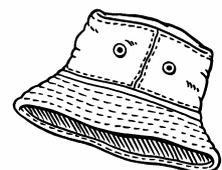
Broad brimmed hat

A broad-brimmed hat that provides good shade can considerably reduce UV radiation exposure to the face. Brims should be at least 7.5 cm wide. The brim width for children under 10 years of age should be proportional to the size of the child's head and ensure that their face is well shaded.



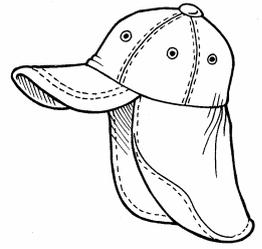
Bucket hat

Bucket or surfie style hats should have a deep crown and sit low on the head. The angled brim should be at least 6 cm and provide the face, neck and ears with plenty of shade. The brim width on bucket hats for pre-school aged children should be proportional to the size of the child's head, making sure that their face is well shaded (minimum of 5 cm as a guide).



Legionnaire hat

Legionnaire-style hats should have a flap that covers the neck. The side flap and front peak should meet to provide protection to the side of the face.



Other factors to consider when choosing a hat

When choosing a hat, uniform committees should also consider:

- the quality of sun protection it offers
- the type of fabric it is made from (close weave or fabric with UPF 50 is best)
- if it is practical (it is easy to keep on and doesn't interfere with activities)
- fashion trends
- cost
- safety
- ventilation (especially if the hat is to be used during physical activity or warmer weather).

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