

SPF is PPE



At this time of year, the risk of sun exposure and damage to the skin is higher. During the summer months, the Earth's tilt makes Britain closer to the sun, leading to longer daylight hours and higher sun angles. Most of us enjoy clear skies and warm weather, but it does mean that the sun's ultraviolet (UVA and UVB) rays are more intense. UVB rays are responsible for causing sunburn and can penetrate the skin's top layer, leading to damage and risk of skin cancer.

Skin Cancer Risk

There are three main types of skin cancer: basal cell carcinoma, squamous cell carcinoma, and melanoma. Outdoor workers, such as construction workers, postal workers, agricultural workers and more, have an increased risk of developing skin cancer due to exposure to UV radiation.

Skin cancer risk is cumulative, meaning that the more time a person spends in the sun without protection, the greater their risk becomes over time. Even short periods of intense sun exposure can add to this cumulative risk.

Occupational risk

Many jobs require work to take place outdoors, with risk of sun exposure, and mitigations should be in place to protect workers. The links to work are clear: studies have shown that workers who regularly work outdoors are three times more likely to be diagnosed with skin cancer. Sunburn and skin discomfort can also reduce an employee's ability to perform their job effectively.

A range of control measures can be used in workplaces, such as protective clothing, sunglasses, and adapting working patterns. More information on mitigations for working in hot weather can be [found here](#); the rest of this article will focus specifically on sunscreen. **If skin cancer is an occupational hazard, then SPF is PPE!**

Sunscreen as a Barrier

SPF stands for Sun Protection Factor, and the SPF number tells you how long the sun's UV radiation would take to redden your skin when using the product as directed versus the amount of time without any sunscreen. Sunscreen with a high SPF rating acts as a barrier against UV radiation. It helps absorb or reflect the UV rays and effectively reduces the skin's exposure and the risk of sunburn and skin damage.



When selecting an SPF, you can look out for the following mark, which indicates that the product meets EU standards:

Personal Protective Equipment

Employers should consider SPF sunscreen a form of Personal Protective Equipment (PPE) for outdoor workers. The relevant health and safety legislation in Britain is primarily governed by the Personal Protective Equipment at Work Regulations 1992 (PPE Regulations). These regulations outline the legal requirements for using PPE in the workplace and are an essential part of ensuring worker safety. Employers have a legal obligation to provide suitable PPE to their employees who may be exposed to risks that other means cannot adequately control. PPE should be provided free of charge.

Employers must ensure the safety and health of their workers. This includes protecting them from known hazards in the workplace. Suppose a risk assessment demonstrates that outdoor workers are exposed to UV radiation as part of their job. In that case, UV radiation is a known occupational hazard, a significant risk factor for skin cancer and other skin-related health issues and providing SPF sunscreen can be seen as a necessary mitigation and requirement to fulfil an employers' legal requirements.

Employers should provide sunscreen and educate their workers on its proper use, including application and reapplication. To maximise its effectiveness, workers should apply a generous amount to all exposed skin, even on cloudy days, and reapply it every two hours, especially if sweating or in water.

Employers must:

- Conduct a risk assessment to identify workplace hazards and assess whether PPE is necessary to protect workers from those hazards.
- Select PPE based on the identified risks and the individual worker's needs. It must be suitable for the specific risks and the working conditions.

- Provide employees with information, instruction, and training on proper PPE use, storage, and maintenance.
- Consider PPE as the last defence against workplace hazards, using control measures to remove and reduce exposure first.

Trade union representatives can take several steps to convince employers to provide SPF sunscreen to workers:

Gather Information and Data:

- Remind the employer of legal obligations to provide a safe and healthy work environment, including protection from known hazards like UV radiation.
- Begin by collecting data and information on the risks of sun exposure for outdoor workers, including statistics on skin cancer rates among this group.
- Highlight employers' legal and ethical obligations to ensure their workers' health and safety.
- Provide cost estimates for SPF sunscreen compared to potential healthcare costs associated with skin cancer treatment.

Highlight Industry Standards and Best Practices:

- Emphasise any industry-specific guidelines, standards, or regulations that recommend or require the provision of sunscreen as part of occupational health and safety measures.
- Provide examples of other employers that have implemented similar sunscreen provisions successfully.

Educate on Health and Safety Benefits:

- Explain how providing SPF sunscreen can contribute to a healthier and safer work environment, reduce the risk of skin cancer, and protect workers from sunburn and other skin-related issues.
- Highlight the long-term benefits of preventive measures.

Engage Workers:

- Involve workers in the discussion and decision-making process. Gather testimonials from members conduct surveys or polls to gauge worker interest and concerns about sun protection.
- Use your union's communication channels to raise awareness about the importance of SPF and gain support from fellow union members.

Legal Compliance:

- If applicable, remind the employer of legal obligations to provide a safe and healthy work environment, including protection from known hazards like UV radiation.

Consider Further Action:

- If negotiations fail, seek assistance from relevant authorities to ensure compliance with occupational health and safety regulations.
- Use SPF as an organising initiative in the union and bring members together to discuss action and leverage over this issue.

Case studies

During the Covid-19 pandemic, many employers were quick to provide workers with hand sanitiser free of charge. The pace to provide SPF to outdoor workers has not been as fast, but thanks to unions recognising this need and making the demand to employers, many are now rolling out provision:

- At one prominent house builder, sunscreen dispensers are provided in all site welfare facilities, and a yearly skin cancer campaign is run, thanks to the efforts of Unite Union members.
- Frontier Agriculture, whose workforce spends long periods outdoors working in crop production, are provided SPF by the employer.
- London Underground workers whose job requires them to be on the gate or exposed platforms are provided SPF by their employer after RMT safety reps pointed out the risks.
- Employees at the Health and Safety Executive’s research centre and at the Environment Agency are provided SPF.
- Many schools provide SPF to teachers, teaching assistance and mid-day assistance where there is an expectation of outdoor work – some also make SPF available to pupils.
- Workers at a chain of rooftop cinemas are provided SPF by the employer.

“We had a safety briefing that highlighted the importance of wearing sunscreen. After the briefing, I looked up sunscreen to see if it was in our general procurement catalogue and so easily ordered. So I asked my line manager saying that if the company thinks it is important PPE, then surely the company should provide it. He agreed, and we got enough tubes for my team of 20.” – a union member