



# Management Plan for Sun Protection

## Background

The ARPANSA Radiation Protection Standard for Occupational Exposure to Ultraviolet Radiation states that employers must create and implement a sun protection plan. This document gives you guidance on the type of material that should be included in such a plan.

### EXTRA INFORMATION

A Supplement (available on the ARPANSA website) contains more detailed information such as:

- the different types of reflective surfaces and how reflective they are; and
- the types of controls that you can implement.

## Elements of a UV Protection Plan

### 1. Purpose and Objective

The plan should have a purpose and objective which should cover the following:

- The dangers of overexposure to the sun e.g. skin cancer and eye damage.
- Who it is aimed to protect.
- How this plan will protect them.

### 2. Duties and Responsibilities

The plan should assign duties and responsibilities which could include the following:

- Who is responsible for creating/writing and maintaining a plan.
- Which employees, contractors etc. should follow the plan.
- Who is responsible for ensuring those employees, contractors etc. follow the plan.
- Who is responsible for performing risk assessments.
- Who is responsible for providing or implementing control measures.
- Who is responsible for taking measures after an overexposure to UV.

### 3. Assess the Risks

The plan should include information on performing a risk assessment and could include the following:

- When or how frequently a risk assessment should be conducted.
- Which employees, contractors etc. should be identified in the risk assessment identifying whether they:

- work outdoors
- take breaks outdoors
- work near reflective surfaces
- work at altitudes.
- What work situations, tasks or jobs should be identified in the risk assessment.

## 4. Implement Appropriate Control Measures

The plan should include information on when, what and how control measures will be implemented. In deciding which control measures are appropriate, the plan should take note of secondary hazards that can be created by some control measures.

In describing when control measures should be implemented, the plan should include information such as the following:

- that control measures should be implemented in order of priority i.e. elimination first, then substitution, then engineering controls, then administrative controls, and finally PPE;
- who and when control measures should be implemented.

The following lists (in priority order) the control measures outlined in the Standard that could be implemented:

- Elimination: means eliminate the hazard. In the case of exposure to UV from the sun, this is not practical and one or more of the following measures will be required.
- Substitution: means substitute a source of UV that is less hazardous. In the case of exposure to UV from the sun, this is not practical—you cannot substitute something else for the sun. Therefore, one or more of the following measures will be required.
- Engineering Controls: physical changes to the workplace or work environment e.g. putting up shade-cloth to protect workers from the sun.
- Administrative Controls: actions or behaviours employers and employees can take to reduce to their exposure e.g. do outdoor jobs/tasks earlier in the morning or later in the afternoon (when levels of solar UV are less intense).
- Personal Protective Equipment: equipment that you wear to protect yourself against UV from the sun e.g. sun-protection clothing that covers as much skin as possible, hats, sunglasses, SPF30+ sunscreen.

## 5. Post Incident Exposure Management

The plan should also have some provision of what to do in case of an over-exposure such as:

- How the exposure should be investigated i.e. to determine the level and extent of the exposure.
- What appropriate changes to procedures and plant or equipment will be implemented as soon as reasonably practicable after an over exposure.

The plan should also outline how any proposed changes aim to prevent future overexposures to employees working in similar situations.

Some of the actions that could be considered in the event of over-exposure to the skin or eyes include the following:

- How first aid would be obtained from the nearest first aider, doctor or hospital.
- How employers will arrange for those overexposed to be medically assessed.
- How and who will advise and ensure the employee understands the nature of his/her exposure.

With regard to reporting an incident to the relevant regulatory authority, the plan should have information about the following:

- How the incident will be reported.
- Who will report the incident and to whom i.e. the regulatory authority.
- What will be reported about the incident.
- The timeframe for when reporting for an incident will be finalised and submitted to the relevant regulatory authority.

## **6. Other**

Implementation of the plan should include some provision for employees and employers to sign a document where they acknowledge they have read, understood and will comply with relevant parts of the plan.