

Cynulliad Cenedlaethol Cymru | National Assembly for Wales  
Y Pwyllgor Plant, Pobl Ifanc ac Addysg | Children, Young People and  
Education Committee

Blaenoriaethau ar gyfer y Pwyllgor Plant, Pobl Ifanc ac Addysg |  
Priorities for the Children, Young People and Education Committee

CYPE 43

Ymateb gan : Bwrdd Ymddiriedolwyr Chwarae Cymru  
Response from : Board of Trustees Play Wales

Play Wales is the national charity for children's play. The organisation works to raise awareness of children and young people's need and right to play and to promote good practice at every level of decision-making and in every place where children might play.

We worked closely with Welsh Government on its groundbreaking 'Play Sufficiency' legislation, set out in Section 11 of the Children and Families (Wales) Measure 2010. Play Wales has been referred to as "a highly focused, policy-oriented NGO" (Croke and Williams, 2015), which has influenced change.

Established in 1998, Play Wales has authored two reviews (for Welsh Government) of the local authority Play Sufficiency Assessments, five State of Play in Wales policy reports ([www.playwales.org.uk/eng/stateofplay](http://www.playwales.org.uk/eng/stateofplay)), and play chapters in the Wales UNCRC Monitoring Group reports ([www.swansea.ac.uk/media/WalesUNCRCReport\\_v3.pdf](http://www.swansea.ac.uk/media/WalesUNCRCReport_v3.pdf)). Our response below is informed by these reports.

The Board of Trustees of Play Wales is pleased to have the opportunity to input into the consultation regarding Committee priorities for the Children, Young People and Education Committee.

**Question 1** – Within the remit set out above: what do you consider to be the priorities or issues that the Children, Young People and Education Committee should consider during the Fifth Assembly?

**Funding for play development and play provision**

The Welsh Government has clearly taken measures to deliver its commitment to children's play, and it is right to record that for the past 16 years it has funded initiatives that have supported play development and staffed play provision. However, there have been issues regarding this funding and recently insufficient resources have been committed to the infrastructure at national, regional and local

level to ensure a strategic approach is maintained.

Locally, staffed provision has been funded through the Play Grant, Play Theme of Cymorth, Families First funding programme, and the Children and Families Delivery Grant. Communities First and Families First are two Welsh Government programmes to provide support for those living in poverty or deprived areas.

Provision for children's play has been included under these programmes if they meet locally identified need in some areas in Wales. However, several stakeholders have advised Play Wales that Welsh Government officials working with local authorities are stating otherwise and recently the funding of play provision through these programmes has decreased significantly. The majority of play services (within both the statutory and voluntary sectors) are to a significant extent, grant funded. The consequence of this lack of core funding for children's play has resulted in key officers' time and energy often being used for bid writing rather than the development or delivery of play services. Play Wales' review of the 2016 Play Sufficiency Assessments has shown a significant reduction in local authority staff employed to develop and deliver play opportunities as well as the closure of five regional play associations.

### **National support**

From 1998 until September 2014, Welsh Government core-funded the work of Play Wales through its Children and Families Organisations Grant. In early 2014, this grant was reconfigured into the Children and Families

Delivery Grant and Play Wales was unsuccessful in its application for core funding. Following an international campaign in support of Play Wales and submission of an Action Plan, Welsh Government has funded Play Wales through the Play Wales Strategic Policy Grant until September 2017 for some of the work the organisation undertakes. Whilst gratefully received the amount awarded represented a significant reduction on the grant previously received and was less than needed to maintain the established model of delivery. Staff redundancies were made and the Board agreed to draw significantly on its reserves to maintain the reduced establishment and meet the strategic priorities outlined in the Action Plan originally submitted to Welsh Government. Despite the reduction in resources and staffing, our recent Information Service survey demonstrates that the Play Wales team continues to be seen nationally and internationally as leaders in the field of children's play, play provision and the professional development of practitioners.

After two years of supplementing the grant with Play Wales' reserves, Trustees are no longer able to commit the same level of reserves and

the small staff team of six will reduce working hours on 1 October 2016 by approximately 20%. The Board of Trustees is mindful that the detailed, highly valuable and respected work implemented at all levels is reliant on advice and expert input from an underfunded and increasingly overstretched staff of Play Wales. We cannot understate our concern at the negative impact this will inevitably have across all aspects of play infrastructure in Wales, particularly strategic development in support of Welsh Government policy.

### **Local decision making**

At regional and local level stakeholders have reported a history of inadequate accompanying guidance for funding programmes. This ambiguity of advice has often resulted in a misinterpretation in decision-making at local level, often compounded by a lack of local transparency in decision-making. Evidence (Play Wales, 2003, 2006, 2009, 2011 and Lester and Russell, 2015) suggests that complimentary initiatives such as Integrated Children's Centre funding, Communities First, and Community Focused Schools were not used to best effect for children's play.

We draw the Committee's attention to recently published research ([www.c1stsupport.wales/wp-content/uploads/2016/07/Analysis-of-the-economic-impact-of-playwork-in-Wrexham-final.pdf](http://www.c1stsupport.wales/wp-content/uploads/2016/07/Analysis-of-the-economic-impact-of-playwork-in-Wrexham-final.pdf))

commissioned by WCVA in its capacity of supporting the Communities First programme and conducted in Wrexham by The Means; we advise that the research findings suggest that investing in play provision is good use of funding programmes, particularly those with a focus on reducing poverty.

The considered the social benefit of playwork provision in terms of return on investment. This included exploring the immediate and deferred benefits to people from developing social capital and improving their current or future employment prospects (particularly the development or retention of attributes that employers find desirable) as a consequence of having access to regular and sustained playwork provision. It also considered the preventive nature of these services and how they may ultimately deliver savings for statutory partners due to avoided costs.

The study concluded that every £1 invested in playwork returned £4.60 in immediate and deferred social benefits. However, this was an underestimate because the findings are only based on measureable benefits within the scope and timescale of the commissioned work.

### **Scrutiny and joined up working**

Unfortunately, the lack of clear and concise guidance, backed by robust scrutiny at national level appears to have resulted in assumptions, expectations and good intentions made at national policy level, not being translated into practice at local level. For

example, in Education, while the Foundation Phase has raised awareness of the importance of play, there is in practice, an over emphasis on the use of play in learning to meet an education agenda, rather than as a rights-based issue in schools.

The change of Government funding priority which saw the Cymorth unified funding stream being subsumed into Families First resulted in a significant hiatus in funding for play provision across Wales and was exacerbated by the paucity of guidance as to how the grant might be used. In some instances the resulting challenges were resolved, but in many cases this had the consequence of the significant reduction in the level of Government funding being used to support play provision. The Play Sufficiency Assessments submitted by local authorities in March 2016 indicate that for those that do access Families First programme funding, there is a reliance on it for play development, play delivery and/or both of these. There is concern that play development and play service delivery are in danger of further cuts due to planned changes to this programme.

An analysis of Play Sufficiency Assessments suggests that local authorities and their partners feel that the duty to undertake Play Sufficiency Assessments has raised the profile of play locally and contributed to the forging of stronger cross departmental links between local government officers. These observations are supported by the findings from a small-scale research project exploring how local authorities responded to the introduction of the duty to assess sufficiency of play opportunities for children.

*Leopard Skin Wellies, a Top Hat and a Vacuum Cleaner Hose: An analysis of Wales' Play Sufficiency Assessment duty* ([www.playwales.org.uk/login/uploaded/documents/Play%20sufficiency/PSA%20research%20executive%20summary.pdf](http://www.playwales.org.uk/login/uploaded/documents/Play%20sufficiency/PSA%20research%20executive%20summary.pdf)) draws on data from 20 local authority Play Sufficiency Assessments and associated documentation, interviews and notes from stakeholder meetings in three local authority case studies, notes from attending regional meetings to share experiences across local authorities, interviews with a Welsh Government officer and key officers from national partners (Play Wales and Welsh Local Government Association) and an online survey for key stakeholders involved in the Play Sufficiency Assessment process.

Key themes arising from the analysis:

- In many local authorities, the Duty has strengthened existing partnerships both within the authority and also with other key stakeholders, particularly the voluntary sector, although this was not uniform. It has brought together local authority departments

who traditionally may have been perceived to have little in common with regards to children's play, most notably planning and local development, transport and highways, and environment.

- Some Play Sufficiency Assessments have developed a range of approaches to consultation with children (and in some cases adults) that extends beyond tokenistic and abstract surveys. These exercises suggest that children have a knowledge about their environments and how space, time and attitudes impact on their experiences of play.
- When the views of children is given higher profile and combined with professional expertise, partners are forming 'collective wisdom'. There appears to be a consideration of the ways in which local environments may enhance or inhibit children's ability to find time and space for playing.

*Within Wales: A Play Friendly Country Statutory Guidance to Local Authorities on assessing for and securing sufficient play opportunities*, there is an expectation that local authorities should establish a Play Monitoring Group or equivalent. This group should support the lead director, the lead member for children and young people's services and the designated lead for the managerial and delivery functions to fulfill the duty under the Measure and thereby secure sufficient play opportunities for children.

Despite this expectation of monitoring at local level, there is not yet a clear process for monitoring Welsh Government's activity and actions, which support play sufficiency across all policy areas.

**Question 2** - From the list of priorities or issues you have identified, what do you consider to be the key areas that should be considered during the next 12 months (please identify up to three areas or issues)? Please outline why these should be considered as key priorities.

The United Nations Committee on the Rights of the Child recently examined the UK Government's UN Convention on the Rights of the Child (UNCRC) report in Geneva. The UN Committee assessed the state of children's rights in the UK over the last five years.

The UN Committee has now published concluding remarks (<http://www.playwales.org.uk/eng/news/602-un-committee-feedback-on-uk-childrens-rights> ) on the UK's report. Whilst Wales was commended for its actions in respect of play policy, the 'Rest, leisure, recreation and cultural and artistic activities' section included the following:

73. The Committee welcomes the initiative of the government of Wales to adopt a play policy and integrate children's right to play systematically in relevant legislation and other relevant policies. However, the Committee is concerned about:

(a) The withdrawal of a play and leisure policy in England, and **under-funding of play and leisure policies in Northern Ireland, Scotland and Wales**;

74. With reference to its General Comment No 17 (2013) on the right of the child to rest, leisure, play, recreational activities, cultural life and the arts, the Committee recommends that the State party, including the governments of devolved administrations:

(a) Strengthen its efforts to guarantee the right of the child to rest and leisure and to engage in play and recreational activities appropriate to the age of the child, including by adopting and implementing play and leisure policies with **sufficient and sustainable resources**;

(c) Fully involve children in planning, designing and monitoring the implementation of play policies and activities relevant to play and leisure, at community, local and national levels.

To respond to these concluding remarks, we advise that the Children, Young People and Education Committee should focus on:

#### **Funding for children's play**

The Children, Young People and Education Committee should review the funding streams for children's play infrastructure. Specifically:

- A review of the Children and Families Delivery Grant with a view to:
  - reviewing the strategic impact of the current programme on local play sufficiency action plans
  - securing the national infrastructure for play development, advocacy and support in future
- Consideration of the advice Welsh Government provides with a view to clarifying that Communities First and Families First are two Welsh Government programmes which can provide support for those living in poverty or deprived areas to access play provision. Provision for children's play should be included under these programmes if they meet locally identified need.

#### **Scrutiny of play sufficiency activity at national level**

The Statutory Guidance to local authorities on assessing for sufficient play opportunities for children in their areas encourages local authorities to make a commitment to work strenuously within their structures and

with partner organisations to ensure that children and young people have access to play opportunities.

The issues impacting on children's play cut across ministerial portfolios and departmental boundaries, as well as local authority departments. We believe that local authorities would find it useful if Welsh Government mirrored its expectation that local authorities work cross departmentally, and with other partners, by committing to work similarly within its own structure.

This commitment might include consideration being given to:

- development of a cross-departmental working group of officials and other agencies to help Welsh Government to consider how current policy, guidance and funding programmes could be used to best effect to support local authorities to respond to the second part of the duty.
- publication of Welsh Government's own Play Sufficiency Action Plan, which sets out the actions it is maintaining and developing.
- demonstration of how Welsh Government has applied the Children's Rights Impact Assessment (CRIA) process with regards to Section 11 of the Children and Families (Wales) Measure 2010. In line with the Children's Right's Scheme (linked to the Rights of Children and Young Persons (Wales) Measure 2011).

## References

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