



Ministerial Review of Play

**Prepared by Play Wales for the
Ministerial Review of Play Steering Group**

FINAL REPORT

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1 Introduction

In November 2019, the then Deputy Minister for Health and Social Services announced in a written statement that she had decided to take forward a Ministerial Review of Play. This report provides an overview of the Ministerial Review of Play process.

The aim of the Ministerial Review of Play is to assess Welsh Government work with respect to play policy and to inform how the Welsh Government develops and progresses the play agenda. This review considers the progress made in achieving the Welsh Government's vision for play, as articulated in its *Play Policy*, and sets out a number of key recommendations that need to be implemented.

Children¹ play on their own, with their peers or with supportive adults. The places where children play are varied. Play can occur wherever and whenever conditions are right, both indoors and outdoors. Children's play occurs in a range of places, specifically:

- home, school, childcare and out of school activity settings
- designated spaces for playing, both staffed and unstaffed
- other places such as museums or hospitals
- public spaces that children can access.

This review considers:

- the implementation of statutory legislation, known as the 'Play Sufficiency Duty'
- playwork as the professional service that supports children's play
- play more generally – in schools, neighbourhoods and the wider community
- the alignment of national policies to support children's right to play.

2 Methodology/approach

This review was managed by the Play Policy Team within the Early Years, Childcare and Play Division of the Welsh Government. The review has taken a collaborative approach, recognising the knowledge and experience of key stakeholders in identifying and understanding the issues and in looking at options for the future. This report includes a summary of the findings of the review and is supported by a more detailed background paper.

An internal project board of cross-policy Welsh Government officials was established, which provided overall scrutiny for the project in the early stages. A cross-professional steering group (details in Annex 1: Steering Group membership) of play and playwork specialists, and policy officials from across the Welsh Government, was set up to support the review. The Ministerial Review of Play Steering Group developed the final set of key recommendations and milestones that are set out in this report.

A consultation was carried out through the Young Wales initiative of Children in Wales, asking children to tell us about their experience and thoughts on play. Young Wales, in partnership with

providers across Wales, undertook a series of online and face-to-face consultations. Young Wales engaged with 201 children across Wales through 21 sessions involving children up to 18. The views they expressed are discussed throughout this report and in the accompanying background paper.

Unfortunately, the review was stalled in March 2020 due to the pressures and uncertainties that the coronavirus (COVID-19) pandemic brought. The Welsh Government restarted the review in winter 2021 and a series of workshops gave further consideration to the following areas:

- Cross-policy working
- Play Sufficiency Duty and funding
- Spatial justice and societal involvement
- The regulation and registration of playwork settings
- The play and playwork workforces
- Play and education policy.

In summer 2021, the Welsh Government asked Play Wales to co-ordinate the drafting of this review report. As part of this drafting stage, steering group members were invited to provide feedback and further information about the six areas highlighted in this review.

Play Wales then analysed:

- the content of the papers
- the comments made on the papers by members of the group
- the notes from each of the workshops
- the responses to a post workshops survey.

Following this analysis, Play Wales identified and met with additional stakeholders and policy colleagues to explore the findings and consult on the review recommendations. Play Wales led the report writing. Dr. Wendy Russell drafted Theme 3: Spatial justice, which was peer reviewed by Tim Gill. Wendy also supported the process by technically editing various drafts of the report.

This report provides an overview of the findings from the workshops and subsequent meetings. It also includes a table of key recommendations and milestones for the Welsh Government from the steering group. It is informed by a background paper which provides key literature, reports on the impact of COVID-19 and the rationale for the key recommendations.

The Ministerial Review of Play was undertaken between October 2019 and January 2023.

3 Background

In 2002, the Welsh Government published its *Play Policy*², the first such national policy in the world. This policy statement was produced to reflect the value that the Welsh Government places on play and the importance of children in our society. It reflected the commitment to ensuring that children and their needs are central to policy making and that provision is made to meet those needs. The statement was founded on the principle that all children have a right to play.

Internationally, the importance of play is recognised and protected in the United Nations Convention on the Rights of the Child (UNCRC). Article 31 of this convention explicitly states that children have the right to play and to join in other recreational activities, and that States Parties should recognise these rights.

In 2004, the Welsh Government formally adopted the UNCRC as the basis for policy-making relating to children. The Welsh Government published its *Play Policy Implementation Plan*³ in 2006, setting out how the principles detailed in the *Play Policy* would be implemented. This plan drew together existing support for play and set the direction for the future. It included a set of key actions and a timetable for delivery. As part of the process of this review, Play Wales revisited and reviewed the *Play Policy Implementation Plan* actions.

As an indication of the significance the United Nations places on children's play, it has published *General Comment no. 17*⁴ on Article 31. A General Comment is an official statement that elaborates on the meaning of an aspect of the UNCRC that requires further interpretation or emphasis. *General Comment no. 17* also aims to clarify the importance of Article 31 and to increase accountability among States Parties that have signed up to the convention. Of particular significance to Wales, *General Comment no. 17* encourages national governments to consider legislation to ensure the rights set out in Article 31. It advises that legislation should address the principle of sufficiency – that all children should be given sufficient time and space to exercise their right to play.

During the It's all about you project carried out in summer 2009, children across Wales told the then Children and Young People Committee of the National Assembly for Wales that they were concerned about the lack of safe places to play and hang out in Wales. In response, the committee held an 11-month inquiry into the barriers to play facing children across Wales. The committee's report set out 26 recommendations for the Welsh Government to consider.⁵ These relate to a range of issues, such as transport, planning and the needs of specific groups of children.

The Welsh Government recognised that to achieve its aim of creating a play friendly Wales and providing opportunities for children to play it would also be necessary for local authorities, their partners and other stakeholders to work towards this purpose. As a result, the government legislated in support of children's play, placing a statutory duty on local authorities to assess and, as far as is reasonably practicable, secure sufficient opportunities for children to play as part of the Children and Families (Wales) Measure 2010⁶.

Wales was the first country in the world to establish such a duty within its legislative framework. Consequently, there are no precedents for this work. It is important that the Welsh Government continues to work with stakeholders to make this legislation fit for the purpose of making Wales a play friendly country, with all the benefits this will offer to our children and communities.

The first part of the duty was commenced in November 2012. It requires local authorities to assess the sufficiency of opportunities to play for children in their areas. The Play Sufficiency Assessment (Wales) Regulations set out the requirements of the assessments and the Matters local authorities need to take into account. To assist with this requirement, the Welsh Government published *Creating a Play Friendly Wales*, statutory guidance for local authorities on assessing sufficient opportunities to play.

In July 2014, Welsh Government ministers commenced the second part of this legislation. This places a duty on local authorities to consider their Play Sufficiency Assessments and secure opportunities to play for children in their area, so far as is reasonable and practicable. The duty also requires local authorities to publish and keep up-to-date information about opportunities to play for children in their areas. *Wales – a Play Friendly Country* became the new statutory guidance that local authorities need to follow to comply with the duty to assess and secure sufficient opportunities to play.

Although the Play Sufficiency Duty represents important legislation, play does not and cannot sit alone in its legislative framework. Many, if not all, Welsh Government policy decisions impact on children's ability to play. Sufficiency and quality of opportunities to play also impact on the outcomes for other policy areas, the key example being the positive benefits of play for children's physical and mental health and wellbeing.

The Welsh Government's play sufficiency guidance *Wales – a Play Friendly Country* requires local authorities to examine all policy agendas for their potential impact on children's play. It also requires local authorities to embed targets and actions that will enhance children's opportunities to play into a range of strategies and policies such as:

- Town and country planning
- Traffic and transport
- Health and wellbeing
- Child poverty
- Early years/childcare and family policy
- Intergenerational policy initiatives
- Education and schools
- Health and safety
- Community development.

Local policies and initiatives are influenced by and linked to national direction and legislation. However, although there is explicit statutory guidance for local authorities to work cross-professionally, the same is not true for the Welsh Government itself. It is for this reason that the alignment of key legislation is a theme for this review. This reflects the principles of the Well-being of Future Generations (Wales) Act 2015.

This review has been planned and undertaken to meet the requirements for public bodies in Wales to think about the long-term impact of their decisions, to work better with people, communities and each other, and to mitigate persistent problems such as poverty, health inequalities and the climate and nature emergencies. These requirements are set out in the Well-being of Future Generations (Wales) Act 2015.

In June 2022, towards the end of the review period, the Welsh Government also published the Anti-Racist Wales Action Plan. This action plan highlights the need to move towards an anti-racist approach within childcare and play and needs to be considered when implementing the recommendations in this review.

4 Valuing play

This section summarises the importance of playing and some of the factors that constrain children's freedom to play in their communities.

4.1 The importance of playing

Playing is central to children's physical, mental, social and emotional health and wellbeing. For children themselves, playing is one of the most important aspects of their lives. They value time, freedom and quality places to play. When asked what is important to them, children consistently mention playing and meeting up with their friends.⁷ When they play, children contribute to enhance their immediate wellbeing and their own development.

There is a well-established body of solid evidence showing the contribution that playing, particularly when it is self-organised, can make to children's long-term and immediate wellbeing, to their physical health and to their mental health and resilience. Various studies⁸ have concluded that:

- Playing supports socialisation. When they play, children interact with others, develop friendships and attachments with peers, deal with conflict, and learn respect and tolerance⁹.
- Playing builds resilience. Playing boosts children's emotion regulation, confidence, creativity, problem-solving skills and perseverance, increasing their ability to cope with stress and challenges throughout life¹⁰.
- Playing is crucial for good health and wellbeing. Being active through play helps children physically and emotionally and contributes to their health and happiness^{11 12}.
- Playing supports children in feeling part of their neighbourhoods and wider communities. Playing allows children to learn about the world around them, make connections, and develop a sense of identity and belonging¹³.
- Playing supports learning and development. Playing builds the structures of the brain and skills such as creativity, problem-solving and critical thinking¹⁴.

4.2 Creating the conditions for play

This review takes its definition of play from *General Comment no. 17*, determining play as:

- a behaviour, activity or process that is initiated, controlled and structured by children
- non-compulsory, driven by intrinsic motivation, not a means to an end
- having key characteristics of fun, uncertainty, challenge, flexibility and non-productivity.

General Comment no. 17 provides further guidance on the legislative, judicial, administrative, social and educational measures necessary to ensure its implementation and, as such, is referenced throughout this report.

Opportunities to play can be supported or restricted according to whether children have time, space and permission to play¹⁵ as highlighted in *Wales – a Play Friendly Country*, the latest statutory guidance for local authorities.

- Time: Children’s ‘free’ time when they can become immersed in play. ‘Free’ can be defined both objectively and subjectively (by children).
- Space: The ways public space can support or restrict children’s ability to play, as well as their access to designated spaces for play.
- Permission: Children’s subjective experiences of time and space. These include factors such as a sense of freedom, permission, belonging, fear and harassment, as well as the increasing appropriation and control of play by adults.

Children’s play is therefore reliant on having the time, space and permission to play. Sufficiency of opportunities to play exist more prominently where all three are positively presented.

4.3 Barriers to play

The steering group discussed a range of consistently identified contemporary barriers¹⁶ that prevent and discourage children’s play, and also discussed evidence that supports a more balanced approach. Whilst it is important to remember that children are individuals with a range of opportunities, there are common trends and issues that impact on children’s lives and their ability to access opportunities to play.

Several factors have decreased the opportunity for children to realise (that is, access) their right to play. These include:

- changes in neighbourhoods, including increased car use, increased traffic (moving and parked) and changing work patterns
- parental restrictions due to perceptions of neighbourhood safety, including traffic, bullying, racism and ‘stranger danger’
- increased participation in structured activities, coupled with increased educational demands
- increased intolerance towards children playing and meeting up, with children being seen as ‘out of place’ in public spaces.

4.4 Children’s views on the barriers to play

Having enough time to play is a recurring issue for children: homework, exams and revision limit their free time for play.¹⁷ Children also express a desire for safe places to play and meet up, but their ideas of safe places may not conform with those of adults, and some adults impose their own standards and preferences.

When children talk about feeling safe, they are generally not talking about the Health and Safety at Work Act 1974¹⁸. They are not talking about whether the environment they wish to play in at that time has a regulated, standardised certificate of safety, nor are they talking about wanting or needing adult impositions on their own risk-taking behaviour. They are talking about a sense of social safety where they are in control and feel welcome and free from any threat of violence or aggression.¹⁹

The issues they raise tend to be more about the general cleanliness of outdoor spaces, citing litter and dog mess as things that prevent them from playing outside.²⁰ Children also raise concerns about the speed and volume of cars and traffic in their neighbourhoods.²¹

4.5 Play and COVID-19

The benefits of play are widely recognised, and cut across physical and mental health, wellbeing and child development. Play is both a way for children to keep healthy, and a process that helps them deal with everyday uncertainties, stresses and anxieties. During and immediately following times of uncertainty playing²²:

- helps give children a feeling of normality and joy at a time of loss, isolation and trauma
- helps children overcome emotional pain and regain control over part of their lives
- helps children make sense of what is happening to them, and enables them to experience fun and enjoyment
- offers children an opportunity to explore their own creativity.

With the uncertainty caused by the pandemic, opportunities to play have been vital to helping children make sense of their experiences, solve problems, reconnect with their peers, and promote their own wellbeing. The pandemic and the government's actions to mitigate its spread, such as the closure of schools and playgrounds, meant huge changes to children's freedom to play outside and meet friends.

There is no doubt that the pandemic has had a significant impact on children, and different children have experienced it very differently. Children reported that not being able to see friends or attend play provision was difficult for them.²³ Children's access to the world outside their homes was severely curtailed, highlighting and exacerbating already existing inequalities. For some children, spending more time at home with family was enjoyable, for others it increased stress and hardship. Research has shown that Black children and children of colour in Wales were disproportionately affected by the restrictions of lockdown.²⁴

As we develop interventions and initiatives that support children as they emerge from the pandemic and its related restrictions, play is one of the most important ways to promote children's health and wellbeing. Play is important for all children during times of uncertainty. It is vital that we recognise this as we emerge from the pandemic to protect the mental health and wellbeing of our children and of future generations.

5 Analysis of the key themes

This review has led to the emergence of six themes. This section of the report provides a brief overview of the six themes and introduces the key recommendations and milestones that are developed further in section 7. Key literature, evidence and the impact of the COVID-19 pandemic for each theme are all covered in more detail in the background paper.

5.1 Theme 1: Alignment of key legislation that impacts on the right to play

The steering group discussed the need for alignment of national play policy and the Play Sufficiency Duty of the Children and Families (Wales) Measure 2010 to key primary and overarching legislation, particularly the Rights of Children and Young Persons (Wales) Measure 2011 and the Well-being of Future Generations (Wales) Act 2015. This alignment is two-directional: national policies have a significant impact on children's ability to find time, space and permission to play; and, equally, children being able to play can contribute to the aims of key legislation. The statutory nature of the duty enables dialogue between those involved with planning, transport, housing, open spaces, parks, education, social services and others.

Through play, children can build their own resilience and wellbeing.²⁵ As well as play being good for individual children, families and communities, it also represents an opportunity for sound social investment in line with the Well-being of Future Generations (Wales) Act 2015's focus on preventing future problems. However, being able to play is dependent on the right conditions – specifically time, space and permission – and this is, in turn, dependent on a range of social, cultural, spatial, economic and political factors.²⁶ The organisation of societies influences children's opportunities to play, as well as where and with whom they play.²⁷

This means that, to support the creation of a child-friendly country that offers opportunities for freely chosen play, collaborative policy development across a wide range of areas is needed at both national, regional and local levels. Play is so closely related to wellbeing (physical, social, emotional and community) that actions in almost all policy areas can have an impact on children's opportunities to play.

The significant policies and policy areas that affect children's right to play are:

- The Childcare Act 2006 and associated statutory guidance
- Children and Families (Wales) Measure 2010 (including the Child Poverty Strategy for Wales 2011 and the Child Minding and Day Care for Children/National Minimum Standards)
- Local Government (Wales) Measure 2011
- Rights of Children and Young Persons (Wales) Measure 2011
- Active Travel (Wales) Act 2013 (and 2021 Guidance)
- Social Services and Well-being (Wales) Act 2014
- Planning (Wales) Act 2015 and *Planning Policy Wales* (PPW)
- Well-being of Future Generations Act 2015
- Public Health (Wales) Act 2017 (particularly Part 2 on obesity, the Childhood Obesity Strategy and smoke free playgrounds and spaces)
- Curriculum and Assessment (Wales) Act 2021 and the Schools Well-being Framework
- *Interim Youth Work Board for Wales: achieving a sustainable delivery model for youth work services in Wales Final report* (2021)
- Renew and reform 2021, the Welsh Government's education COVID-19 recovery plan
- Anti-Racist Wales Action Plan 2022
- 20mph national speed limits on restricted roads 2022
- Town Centre Regeneration policy
- *Llwybr Newydd* – Wales Transport Strategy 2021.

Key partnerships exist at local level with a variety of teams, departments, services and individuals. These include planning, housing, highways, active travel, green infrastructure, open spaces, town centre managers, Town and Community Councils, police and other professionals. This review has necessarily involved stakeholders and officials with a range of policy interests including education, playwork, youth work, health, planning, safeguarding, childcare, housing and transport.

Children clearly identified where responsibility lies for ensuring there are sufficient opportunities to play: with the Welsh Government, local authorities and their staff, and schools and education services.²⁸

Three key messages that are relevant to this theme emerged from their participation:

- challenges with transport infrastructure and access to formal and informal spaces to play
- the importance of recognising the benefits of play for all children, including older children
- their desire to contribute to the planning of services and opportunities to play across a range of sectors.

Four research studies commissioned by Play Wales, into the implementation of the Play Sufficiency Duty highlight that the process encourages and facilitates cross-policy working at local authority level. However, the 2020 study found that at both national and local levels there is a need for better alignment of policies through explicit links to play in other acts and guidance. Closer alignment at national level would support policy alignment at a local level.²⁹

As part of this review, the steering group identified a range of sector specific national legislation, policies and initiatives that affect children's play – see the background paper (section 3: Analysis of the key themes) to this report. It became apparent to the group that almost every policy has an impact on if, where and when children can play.

As stated above, the review has highlighted the need for alignment of national play policy and the Play Sufficiency Duty with two key primary and overarching pieces of legislation. These influence a wide range of sector-specific legislation, policies and initiatives that impact on children accessing their right to play:

- Rights of Children and Young Persons (Wales) Measure 2011
- Well-being of Future Generations Act (Wales) 2015.

In 2011, Wales became the first country in the UK to incorporate children's rights within domestic law with the introduction of the Rights of Children and Young Persons (Wales) Measure 2011. The measure places a duty on ministers to have due regard to the UNCRC when developing and reviewing legislation and policy.

*Wales – a Play Friendly Country*³⁰ is underpinned by children's rights and highlights three United Nations Convention on the Rights of the Child Articles that particularly relate to this duty:

- Article 31 (Leisure, play and culture): Children have the right to relax and play, and to join in a range of cultural, artistic and other recreational activities.
- Article 15 (Freedom of association): Children have the right to meet together and to join groups.

- Article 12 (Respect for the views of the child): When adults are making decisions that affect children, children have the right to say what they think should happen and have their opinions taken into account.

The Well-being of Future Generations (Wales) Act 2015 places a requirement on public bodies in Wales to think about the long-term impact of their decisions, to work better with people, communities and each other, and to prevent problems and take a more joined-up approach.

The background paper discusses in more detail how successful implementation of the Play Sufficiency Duty aligns with both the five ways of working and the seven wellbeing goals of the Well-being of Future Generations Act (Wales) 2015. This can be through:

- partnership working
- the prevention of future problems
- a focus on the health and wellbeing of communities and future generations
- synergies with environmentally sustainable development and responses to the climate and nature emergencies
- a focus on space and placemaking.

The steering group concluded that explicitly incorporating the Play Sufficiency Duty into guidance at national and local levels can help public bodies identify and reach wellbeing goals for children and communities. It is important to remember that references in the Well-being of Future Generations Act (Wales) 2015 to people include children. Unfortunately, children only feature explicitly in the act in terms of health measurements, child development and adverse childhood experiences. This is a deficit approach, which does not celebrate children’s capabilities or competencies.

The play sufficiency research studies mentioned earlier in this section have applied an assets-based approach. This approach looks at play in terms of what children do when the conditions are right and establishes play as their way of maintaining their own health and wellbeing. This is most evident in the 2020 study³¹, which aligns the process of play sufficiency with the approach taken in the Well-being of Future Generations Act (Wales) 2015 and the Social Services and Well-being Act (Wales) 2014, and also by Public Health Wales, highlighting that “an assets approach identifies factors that support good health and well-being and relies on working locally with communities”³².

Implementation of the play sufficiency process has required meaningful engagement with children and relied on a view that sees children as competent individuals with the capacity to influence positive developments with regards to their play. Across Wales, children have provided views about their opportunities to play³³. When supported to do so, children can provide rich knowledge and information about their neighbourhoods³⁴. Actively engaging with children gives us an opportunity to take an assets-based approach to meeting their play needs.

Key recommendation 1: Take a strategic approach to play sufficiency across all Welsh Government policy areas.

Key recommendation 2: Ensure that Welsh Government policy instruments include measures to support children’s ability to make the most of opportunities to play.

5.2 Theme 2: Play Sufficiency Duty and funding

The steering group discussed implementation issues relating to the Welsh Government's Play Sufficiency Duty since 2012. The discussion highlighted the importance of working strategically and collaboratively at both local and regional levels for children's play and also considered funding arrangements.

Play sufficiency

General Comment no. 17 encourages national governments to consider legislation that will ensure the rights included in Article 31 (see section 3: Background). It advises that legislation should address the principle of sufficiency – all children should be given sufficient time and space to exercise their right to play.

A section on Play Opportunities was included in the Play and Participation chapter of the Children and Families (Wales) Measure 2010³⁵. Part of the measure places a legal duty on local authorities to assess and secure sufficient opportunities to play for children in their areas.

When assessing play sufficiency, local authorities must consider nine Matters (or topics) which are described in *Wales – a Play Friendly Country*³⁶. Local authorities should use the *Play Sufficiency Assessment Toolkit*³⁷ along with the standardised *Play Sufficiency Assessment Template*.

Four small-scale research studies (mentioned in section 5.1), exploring the successes and challenges, have been undertaken since the commencement of the Play Sufficiency Duty. The research into local authority implementation suggests that although the process of considering play sufficiency encourages and is facilitated by cross-policy working at local authority level, this practice needs to be strengthened. There is less evidence of cross-policy working at national level and this needs to be improved.³⁸ Generally, there is good collaboration across local authority departments, but collaboration is most effective where there is a designated play sufficiency lead officer.³⁹

The Welsh Government has long recognised the crucial role of parents, carers and communities in supporting or constraining children's play both in the home and in the community. The 2006 *Play Policy Implementation Plan* included an action to produce information on what constitutes quality play and how families and communities can help facilitate it.

Furthermore, the *Play Sufficiency Assessment Toolkit* recognises that creating a play friendly Wales where children have sufficient time, space and permission to play "will need parents, families and everyone in the community to recognise that play is of great importance in children's present lives and for their future development".⁴⁰ This was also raised in workshop discussions during this review and acknowledged in the research into the Play Sufficiency Duty.⁴¹

Since 2018, Play Wales has been providing public information through *Playful Childhoods*,⁴² a website and campaign that "helps parents and carers give children time, space and permission to play at home and in their local community". Alongside the website, there have been social media campaigns, roadshows and events. Furthermore, children have said that they would like to participate in developments that relate to their play.⁴³

The research consistently shows the essential role that Play Wales has, both in working with the Welsh Government and supporting local authorities with their work on the Play Sufficiency Duty. Play Wales was funded by the Welsh Government to support the development of the legislation and statutory guidance and since the commencement of the duty, supports the processes of play sufficiency in several ways, including:

- facilitating regional meetings to support local authorities with play sufficiency
- commissioning and disseminating research
- providing national reviews of local authority Play Sufficiency Assessments
- commissioning professional development programmes and running a series of cross-professional conferences
- developing playwork
- commissioning, writing and publishing information sheets and toolkits
- providing personal officer support.⁴⁴

The research indicates that Play Wales' local, national and international experience and expertise is greatly appreciated by all those interviewed

Funding

There is no national budget or ringfenced funding dedicated to play or play sufficiency functions. The Welsh Government has historically made capital and revenue funding available for play sufficiency on an ad-hoc, end of year basis via the All Wales Play Opportunities Grant (AWPOG). The funding is welcomed by local authorities and has been used to make progress. However, the often-restricted time frame means that it cannot always be spent in the most strategic way⁴⁵.

Part two of the Play Sufficiency Duty was commenced on the understanding that it would be cost neutral. However, local authorities report a decrease in funding for play over this period.⁴⁶ There has also been a reduction in budget and personnel across other areas that influence play sufficiency.

Another key issue is the closure of the majority of voluntary regional play associations across Wales. The few which are still operating do not have the resources to contribute at a strategic level and often lack the capacity to respond to offers of funding when they become available. Issues such as the cost of insurance and the retention of staff also have a significant impact on the provision of play and playwork services by the voluntary sector.

While all local authorities produce annual *Play Action Plans*, the late notice for AWPOG allocations means that funding does not arrive in a way that supports priorities. Local authorities are forced to take forward what is achievable rather than what is most strategic. The ability to make use of funding is also closely related to the presence of a designated play sufficiency lead officer with enough authority to make decisions and carry influence.⁴⁷ Without an officer who has direct responsibility for play sufficiency, it is a challenge for local authorities to maintain strategic and monitoring groups, access funding and liaise with stakeholders to allocate funding well.

Key recommendation 3: Ensure that any plans for recovery from the pandemic and cost of living crisis consider children's right to play.

Key recommendation 4: Ensure that the implementation of the full breadth of the statutory Play Sufficiency Duty is adequately resourced and funded.

Key recommendation 5: Support the delivery of a public information programme about the right to play.

Key recommendation 6: Apply the Play Sufficiency Duty more widely to include a range of other bodies.

5.3 Theme 3: Spatial justice

The steering group explored why and how the Welsh Government needs to make neighbourhoods and other public spaces more encouraging and welcoming for play. Discussions included key national policies that have an impact on children being able to play in their neighbourhoods and public areas.

Children's right to play

The Play Sufficiency Duty is rights based, as is all Welsh legislation and policy regarding children and young people. The United Nations Committee on the Rights of the Child's *General Comment no. 17*⁴⁸, makes the statement that children play anywhere and everywhere. This seemingly simple statement is profound and helps explain two key points about the Welsh Government's understanding of play.

First, play is not just an activity that takes place in designated spaces and at designated times. This is acknowledged in the Play Sufficiency Duty, which recognises the need for both specific play provision and the right of children to play outside in their neighbourhood. Second, *General Comment no. 17* shows how play is inherently spatial, which means that we need to build stronger links to spatial policies. At the heart of *Planning Policy Wales (PPW)*⁴⁹ is the principle of achieving wellbeing through placemaking. This is a core aspect of the Well-being of Future Generations (Wales) Act 2015 and provides an opportunity to state explicitly how spaces can work for children. The background paper goes into more detail about the inequalities in children's ability to play outside in their neighbourhoods.

Generally, a child-friendly public environment will support children's ability to move around safely and freely. This requires thoughtful traffic measures and giving priority to pedestrians. It will also offer children opportunities for playing and meeting up. Time, space, permission and the opportunity to be with other children are key features of a playable public space.⁵⁰

What do we mean by spatial justice?

In the context of this review, spatial justice is about two things:

- children's fair and just access to what public space has to offer
- children's participation in what public space has to offer.

The focus here is on general public space and particularly neighbourhoods. Spatial justice is therefore about children's 'everyday freedoms'⁵¹ to move around their neighbourhoods and play or meet up with friends. This becomes increasingly important as children get older.

The concept of spatial justice fits well with the focus on placemaking in PPW. It also chimes with the notion of 'cynefin', embraced in the Curriculum for Wales 2022. Both are helpful in looking beyond the mere technicality of design. 'Cynefin' is defined as:

“The place where we feel we belong, where the people and landscape around us are familiar, and the sights and sounds are reassuringly recognisable. Though often translated as 'habitat', cynefin is not just a place in a physical or geographical sense: it is the historic, cultural and social place which has shaped and continues to shape the community which inhabits it.”⁵²

For all children to feel they belong, they need to be able to exercise everyday freedoms to move around their neighbourhoods safely and play and meet up with friends.

Spatial justice and Welsh Government policy

The Play Sufficiency Duty has enabled local authorities to explore and address issues of spatial justice for children. As mentioned in section 5.1, key partnerships locally are with planning, housing, highways, active travel, green infrastructure, open spaces, town centre managers, Town and Community Councils, police and other professionals whose work involves the design, management and organisation of public space. Stronger and more explicit reference to the Play Sufficiency Duty in the guidance relating to spatial policies, including the Well-being of Future Generations (Wales) Act 2015, could make partnership working at local level much easier.⁵³

The synergy between the benefits of a successfully implemented Play Sufficiency Duty and the wellbeing goals of the Well-being of Future Generations (Wales) Act 2015 can and should be optimised, through more explicit guidance for the development of wellbeing plans.

PPW is central to spatial justice for children. The principle aim of achieving wellbeing through placemaking shows a desire to move towards planning based on sufficiency of opportunities to play as defined in the statutory guidance *Wales – a Play Friendly Country*.

There are also close links between the Play Sufficiency Duty, spatial justice and the Active Travel (Wales) Act 2013. The guidance⁵⁴ accompanying that act acknowledges that routes that are suitable for walking are also suitable for playing, and that attractive routes can include formal or informal play spaces or green infrastructure.

The underlying principle of placemaking through wellbeing in planning policies strongly supports spatial justice for children, and efforts should be made to support local authorities (and, where relevant, Town and Community Councils) to bring planners and play sufficiency staff together. Engagement with the principles and guidance in these policies should be encouraged both at local and national levels.

The pandemic has “reinforced the need for well-designed, people orientated streets”.⁵⁵ In addition, the focus on achieving wellbeing through placemaking in PPW means that much closer working between the Play Sufficiency Duty, the planning system and other spatial policies would be mutually beneficial in the work towards our recovery from the pandemic.

Key recommendation 7: Ensure the right to play is sufficiently incorporated into strategic policy instruments and decisions.

Key recommendation 8: Ensure that the principle of play as a matter of spatial justice is recognised and understood throughout *Planning Policy Wales*.

Key recommendation 9: Ensure that the views and experiences of children inform the ways in which neighbourhoods are planned and managed.

5.4 Theme 4: Playwork provision and regulation

The steering group considered both the current context and a range of historical issues regarding the regulation and registration of staffed playwork provision. It explored ways to improve regulatory systems so that more children can feel safe in the range of opportunities they enjoy in their free time.

Contributing to this review, children have said that they need “places to go that makes them feel happy and safe”⁵⁶. Children have also said that the lack of provision for play, recreation and youth work services can contribute negatively to their mental health and wellbeing. Playwork provision within neighbourhoods offers opportunities for children to play together supported by knowledgeable and skilled playworkers and provides opportunities for both informal and formal childcare for parents.

Playwork is defined within *Wales – a Play Friendly Country*⁵⁷ as a “a highly skilled profession that enriches and enhances children’s play. It takes place where adults support children’s play, but it is not driven by prescribed education or care outcomes”. This definition makes it explicit that playworkers are concerned primarily with supporting and facilitating children’s play.

Staffed playwork provision can happen in a range of settings, including out of school childcare clubs, open access playschemes, adventure playgrounds, day nurseries, youth clubs and schools. Open access playwork, out of school childcare clubs and childcare settings that run for more than two hours a day or more than six days a year are regulated by Care Inspectorate Wales (CIW). Any provision that does not meet this requirement cannot be registered. There is no system for voluntary registration.

Stakeholders have stated that one of the main purposes of regulation for out of school childcare and open access playwork settings is to ensure that they meet children’s rights and comply with requirements, including having suitably qualified staff. During the review, children strongly supported the principle of regulation and stated that all settings should follow a code of conduct and be responsible for safeguarding through attending appropriate training and being registered with bodies such as Care Inspectorate Wales (CIW)⁵⁸.

The review highlighted several challenges in the way that out of school childcare and open access playwork settings are currently inspected and regulated. These are summarised here:

- How a range of settings/circumstances are exempt from regulation under the Child Minding and Day Care Exceptions (Wales) Order 2010 (as amended)⁵⁹. A much clearer picture is

needed of the impact of the exceptions and clarity for settings about what is meant by coaching and tuition. Furthermore, a better understanding of safeguarding arrangements in settings covered by the Exceptions Order is needed. This a complex area and more context is included in the background paper.

- How regulations and the Exceptions Order affect provision. This includes reviewing the exception that allows a setting to change its purpose from play to sports/arts to avoid regulation.
- Whether some requirements for out of school childcare and open access playwork settings need to be different to those of other regulated childcare settings.
- Whether the current National Minimum Standards for Regulated Childcare (NMS) should be adapted for open access playwork settings, including consideration of standalone NMS for open access playwork settings.
- Whether there is a need for a more proportionate inspection process that better reflects the practice of both out of school childcare and open access playwork settings. This includes considering how to regulate and inspect seasonal provision (holiday playschemes) effectively, given that it may operate for as little as two weeks a year. How to move to a more proportionate approach is explored further in the background paper. It would include looking at: frequency of inspection, ease of registration, level of paperwork and the adoption of an approach of undertaking only ‘focused inspections’ after initial registration.
- How to regulate organisations that offer playwork provision from multiple sites, in particular peripatetic projects.
- How to ensure inspectors have knowledge and experience of the unique ways in which open access playwork and out of school childcare operate including increasing their occupational competence in playwork.

Towards the end of the preparation of this report, the Welsh Government launched a consultation on some of the standards included in the NMS for Regulated Childcare. The responses from the playwork sector will help set the context for further consideration of the regulatory regime and the NMS for Regulated Childcare.

Key recommendation 10: Ensure there are adequate safeguarding arrangements in playwork settings.

Key recommendation 11: Review child minding and day care regulations and orders relating to playwork.

5.5 Theme 5: Workforce and qualifications

The steering group discussed the valuable role of playwork and issues around training and qualifications. It also highlighted the importance of professional development for a range of other professionals who have an impact on children’s play.

The Welsh Government places a high value on ensuring that those whose work impacts on children’s play are suitably knowledgeable and skilled and also appropriately qualified. The Welsh Government’s 10-year *Childcare, Play and Early Years Workforce Plan*⁶⁰ articulates the vision for the sector.

In *Wales – a Play Friendly Country*⁶¹, the Welsh Government requires local authorities to support the development of the workforce. This includes the involvement and training of other professionals within the children’s workforce, volunteers and community members.

Wales – a Play Friendly Country makes a distinction between the workforces involved in supporting children’s play. The playwork workforce (adults who directly facilitate children’s play) and the play workforce (everyone whose work impacts on children) are different and their professional requirements are distinct. This review, whilst focusing on the needs and requirements of the playwork workforce, also considers the ongoing needs of the wider play workforce for Continuing Professional Development (CPD). The diversity of the play workforce is explored under the sub-heading Play workforce below and in the background paper.

Playwork provision may occur in a range of settings, including open access playwork, childcare, schools, hospitals and youth work. Some of these professions also have their own qualifications systems – for example, youth work, hospital play specialists and schools. In these instances, playwork qualifications can support and enhance practice.

Playwork qualifications and funding

In Wales, playwork qualifications have been developed against a set of National Occupational Standards (NOS)⁶². The qualifications are intended for all those working in playwork roles in regulated settings. The NMS state that qualifications for playwork are included in the *Required List of Qualifications to work in the Playwork Sector in Wales*⁶³ produced by the Playwork Education and Training Council for Wales (PETC Wales). In the past few years, the Welsh Government has funded the development of a suite of playwork qualifications developed by Play Wales with Agored Cymru. Through the all-age Apprenticeship and Progress for Success programmes, the Welsh Government funds the delivery of playwork qualifications from a range of different organisations and awarding bodies.

The playwork sector faces challenges in meeting some of the qualification requirements and reflecting the diversity of Wales. Particular issues include:

- Access to funded training, especially when current European funding (the Progress for Success programme) comes to an end in 2023.
- Availability of courses at the times and locations they are needed.
- The ability of employers to release staff for training.
- Competing sectoral requirements where ‘portfolio workers’ may require other qualifications such as childcare and youth work to work full-time with children.
- A significant lack of representation of disabled and ethnic minority playworkers.
- Relatively low pay. There is no nationally agreed pay structure for playwork, so rates of pay vary across settings and regions and this impacts on investment in qualifications.
- A weak infrastructure of occupationally competent playwork tutors.
- A lack of Welsh language tutors, assessors and internal quality assurers.
- Seasonal provision that may only run for a few weeks a year and therefore undertakes annual recruitment.
- Occupational competence of line managers to support learners in a particular setting.

- The need for opportunities for CPD and the value of this to practitioners and their employers.

Sector support and representation

In 2002 sector skills councils were established to facilitate strategic leadership with governments across the UK, on the development, implementation and quality assurance of playwork qualifications. However, the sector skills councils' footprints no longer exist. When the decision to cease funding was taken, the councils either collapsed or became businesses selling products and services. In 2014, the then Deputy Minister for Skills and Technology, Ken Skates signalled the move to establishing regional skills consortia under the *Policy Statement for Skills*. At this point the Playwork sector, along with other sectors became known as an orphaned sector.

PETC Wales⁶⁴ (Playwork Education Training Council Wales) was established in 2008 to provide a forum for the sector to discuss issues of strategic importance on all aspects of playwork education, training and qualifications in Wales and to make recommendations to the Welsh Government, Social Care Wales and other national PETCs in the UK.

The absence of an active specific sector skills council for playwork has been felt acutely during recent years and PETC Wales has taken on large parts of the role. However, this is not a sustainable or sufficiently strategic approach in the long term. In the background paper, a number of potential options for sector representation for playwork are explored. The implications of each will need proper consideration and appraisal.

Play workforce

The play workforce is a highly diverse group, most of whom do not require formal qualifications in play to undertake their roles. The range of stakeholders covered by the definition 'play workforce' includes those whose role impacts directly or indirectly on the various Matters defined within *Wales – a Play Friendly Country*. This includes those working in planning, housing, open spaces, parks, cultural services, environmental services, education, early years and childcare, health, travel, highways, community development, youth services, leisure and sport across statutory services. It also includes a range of third sector organisations and may include other stakeholders too, such as the police.

Currently, the funding that is available for professional development tends to be for formal qualifications rather than training and CPD. The wider play workforce would benefit from access to a range of professional development opportunities relating to play, playwork and play sufficiency, as appropriate for their roles. This could take the form of training, professional development programmes, online and printed resources or multi-agency conferences.

Key recommendation 12: Develop a strategic infrastructure for playwork workforce development.

Key recommendation 13: Ensure sufficient funding is available for play and playwork workforce development.

5.6 Theme 6: Play and education

The steering group considered the range of national policy and delivery initiatives that support children in accessing their right to play across educational settings. The discussions highlighted the need to ensure that play is valued in these settings, not only for instrumental educational outcomes, but also for the immediate wellbeing benefits it brings to children of all ages.

International empirical evidence suggests that school playtime initiatives aimed at enriching opportunities to play are linked to a range of improvements in:

- academic skills
- attitudes
- attention
- behaviour
- social skills
- social relations between different groups of children
- enjoyment of and adjustment to school life.⁶⁵

Children of all ages feel that schools and the education sector are responsible for ensuring that they have sufficient opportunities to play. They are clear that playing is not only important for children in primary school, but also suggest that this review should consider playtime or break time for older children aged 12 to 18 in schools and colleges.⁶⁶

General Comment no. 17 refers to the instrumental value of play as an important means through which children learn. Providing a broad and balanced teaching and learning environment, whilst also embracing the health and wellbeing of the child, can potentially lead to a better and more positive learning experience.

The Welsh Government⁶⁷ notes that schools provide an important opportunity for children to play. Play Sufficiency Assessments assess the extent to which schools provide time and space for play, both during the school day and outside school hours.

A range of national educational policies considers play, the curriculum and educational pedagogy:

- The foundation phase for three to seven-year-olds was built on the principles of learning through play and continues as an essential ingredient in the new Curriculum for Wales⁶⁸.
- The new Curriculum for Wales is being adopted across schools and settings in Wales. It builds on the approach and principles developed through the foundation phase. *Designing your curriculum guidance*⁶⁹, published online in January 2022, lists play, play-based learning and time outdoors as key features of successful pedagogy and enabling learning throughout school.
- *Enabling Pathways*, additional guidance for all learners in the period of learning leading to Progression Step 1, stresses that play and playful learning must be considered when schools or settings are designing their new curriculum.
- A Curriculum for funded non-maintained settings⁷⁰ that delivers education for three to four-year-olds recognises that play is the main vehicle for learning for our youngest children.

- The Welsh Government is moving towards an Early Childhood Education and Care (ECEC) approach, which brings together all aspects of early childhood education and care to support the holistic needs of the child.
- The *Community Focused Schools Policy* engages families and works with the wider community to support all pupils, particularly those disadvantaged by poverty.
- The Renew and reform plan⁷¹ sets out how the Welsh Government plans to support learners and practitioners as part of the recovery from COVID-19. The minister’s foreword explicitly talks about how learners “need time and space to play and to socialise with one another”.

Structure of the day: time and permission to play

A review of the 2019 Play Sufficiency Assessments⁷² indicated that school playtime was decreasing across local authorities, despite efforts to address this locally. Concerns about diminished opportunities for play, especially for vulnerable groups, has been highlighted by the British Psychological Society’s Division of Educational and Child Psychologists in its *Right to Play Position Paper*⁷³, and curriculum pressures have led to reduced opportunities for play in schools⁷⁴.

The steering group discussed an increase in parental concern about the shortening of school days which has resulted in reduced playtime, and also the withdrawal of playtime as part of behaviour management policy. The steering group noted that the Welsh Government’s Framework on embedding a whole school approach to emotional and mental well-being⁷⁵ explicitly states that playtime should not be removed from children at school as a form of punishment.

Space to play both in and out of school hours

Research into interventions that can improve playtimes shows they are most effective when:

- schools have clear policies
- staff supervising playtimes are familiar with playwork methods
- a physically rich play environment is provided.⁷⁶

Estyn’s *Healthy and happy – school impact on pupils’ health and well-being* report⁷⁷ highlights that those schools that apply a whole school approach to supporting health and wellbeing include the provision of an environment, facilities and space to play, socialise and relax at break times.

It is clear that for schools, safety concerns have an impact on their support of children’s play. Children report being prevented from engaging in traditional play activities, because they are perceived by adults as being “too dangerous”.⁷⁸ The Health and Safety Executive’s (HSE) high-level statement, *Children’s Play and Leisure – promoting a balanced approach*, recognises the importance of play and opportunities to take risk in play. The HSE is clear that the goal is not to eliminate risk, but to weigh up the risks and benefits.⁷⁹ The steering group noted that the high-level statement could be used more effectively and widely in education settings.

In the Play Sufficiency Assessment process, local authorities are required to consider the extent to which schools provide opportunities to play outside school hours. Discussions during this review noted that schools face several constraints that they must overcome if their facilities are to be used for activities other than their primary function of educating pupils. However, the potential benefits in terms of community engagement and wellbeing, the positive effects on children’s health and

happiness, and the enhancement of a local sense of community make the effort of addressing these constraints worthwhile.

Key recommendation 14: Promote the importance of play and the use of school grounds as a community asset for play through community focused school policy.

Key recommendation 15: Increase and improve play and break times in schools.

6 Conclusion

All the evidence considered throughout the Ministerial Review of Play process reinforces the same point: that playing benefits children, families and the neighbourhoods in which they live. The Welsh Government has taken a global lead in play through ground-breaking policy development, enactment of legislation and the allocation of funds for play. There is now a real need to maintain this momentum and to build on this work by addressing the issues raised in this review.

The established precedent of a direct Welsh Government allocation of funding for play should be continued. It should be developed to provide a consistent and dedicated source of funding for play sufficiency. Funding committed over a period of years will be a more effective way of enabling the development of strategic approaches to delivering play sufficiency. Clear criteria about which provision is eligible will allow sufficient time for consultation, planning, and year-on-year employment of staff.

The national infrastructure for supporting play, play development and play sufficiency across Wales needs to be strengthened and resourced to meet these challenges. Direct funding for play sufficiency lead officers in each local authority in Wales will significantly help local authorities implement the range of Welsh Government policy discussed in the *Ministerial Review of Play report*. The funding programme should also be used to highlight and strengthen the role of the voluntary play sector. This will provide it with the support it needs to take on both strategic and delivery roles in ensuring play sufficiency.

The rights-based approach of the Welsh Government to its child related policy-making allows the Play Sufficiency Duty to explicitly articulate the intrinsic value of play as a right. This sits alongside the more instrumental value of its role in contributing to other policy agendas – for example, tackling child poverty, health and wellbeing, learning and development, and community cohesion.

The Well-being of Future Generations (Wales) Act 2015 requires public bodies in Wales to take a joined-up approach, helping to create a Wales we all want to live in, now and in the future. Successful implementation of the Play Sufficiency Duty aligns well with the act's five ways of working and its seven wellbeing goals. The duty should be explicitly incorporated into guidance for wellbeing assessments at national and local levels to help public bodies identify and reach wellbeing goals for children and communities.

Leadership is needed at national level. Given the potential for the Play Sufficiency Duty to address other social policy agendas, more must be done to promote the duty. This needs to be done throughout the Welsh Government and local authority departments, as well as with national bodies, voluntary and community organisations and the public.

The Welsh Government must work cross-departmentally to ensure the cross-cutting nature of play is acknowledged and embedded in national policies, practices and funding streams. This way of working will be supported by the establishment of a cross-policy play sufficiency strategy and monitoring group that will review national priorities, produce and monitor strategic actions and report to a minister.

The vision and commitment to children's play is already included within the portfolio of the Welsh Minister responsible for children and young people. This Review has highlighted the importance of the Minister having an explicit oversight of cross policy working between play and other policy areas. Cross policy collaboration will support post-COVID-19 recovery plans and contribute to a coherent policy framework for play in Wales.

The development of a more strategic approach to promoting opportunities for play for all children across Wales will help stakeholders support more children to realise their right to play. It will also simultaneously work towards broader policy agendas such as the Well-being of Future Generations (Wales) Act 2015.

There is an urgent need to implement these recommendations to create a more sustainable environment for delivering opportunities for children's play in Wales. There will inevitably be a cost associated with implementing these recommendations, but given the importance of play to the health and wellbeing of children it is a price worth paying.

7 Key recommendations and suggested milestones

This section sets out the 15 key recommendations for the Welsh Government from the Ministerial Review of Play Steering Group. These recommendations have been considered across the six themes and each is supported by a number of suggested milestones.

The suggested milestones are the steps proposed in moving towards making the key recommendations a reality and should be considered as part of the recommendations.

Finally, the steering group has identified the anticipated results of completing these key recommendations and milestones and these are shown under the What will change heading.

Key recommendation 1

Take a strategic approach to play sufficiency across all Welsh Government policy areas.

Suggested milestones

- Play should be central within the portfolio of the Welsh Minister responsible for children and young people, with oversight of cross-policy working between play and other policy areas.
- Establish a cross-policy play sufficiency strategy and monitoring group, which meets annually to review national priorities. The group will produce and monitor an action plan against key recommendations and report to the minister.
- Develop and maintain a live play policy and legislation mapping document which supports and maintains the links between play and other policy areas at a national level.
- Identify departmental play champions across policy areas.
- Ensure that play sufficiency legislation is explicitly included in other policy guidance to ensure cross-policy scrutiny nationally and cross-policy implementation locally.
- Ensure that new and emerging policies such as the Anti-Racist Wales Action Plan and plans which address the climate and nature emergencies are reflected in play sufficiency guidance and the Welsh Government's action plan.

What will change

- Play is considered strategically by the Welsh Government Cabinet. Issues that have an impact on opportunities to play are considered strategically in the development of Welsh Government policy.
- National policy development is monitored against the Play Sufficiency Duty.
- The contribution of play sufficiency to other policies and agendas is explicitly acknowledged in guidance and plans.
- There is better collaboration across the youth work and playwork sectors at national, regional and local levels.
- Policy alignment at local level is better supported, and the diversity of local contexts is taken into account in plans.
- Emerging and evolving policies such as the Anti-Racist Wales Action Plan and plans which address the climate and nature emergencies all consider the issues that impact on play.

Key recommendation 2

Ensure that Welsh Government policy instruments include measures to support children's ability to make the most of opportunities to play.

Suggested milestones

- Review, refresh and relaunch the statutory guidance *Wales – a Play Friendly Country*.
- Update the *Play Sufficiency Assessment Toolkit* to reflect recent developments in the review process. This should include tools to develop and publish a child-friendly play sufficiency assessment. Play as a matter of spatial justice should also feature.
- Develop explicit guidance and update the *Play Sufficiency Assessment Template*, to ensure a consistent reporting system that reflects the diversity of contexts for play sufficiency across local authorities.
- Use the review of Play Sufficiency Assessments to highlight issues that are consistently challenging for local authorities to make progress on (such as insurance, inclusion, recruitment, qualifications and retention).
- Identify and implement interventions that support solutions to these challenges (listed above).

What will change

- Children's right to play is recognised as a cross-cutting theme within policy areas and funded programmes that are aimed at children, families and communities.
 - Local authorities are better supported to assess and secure sufficient opportunities to play.
 - Research findings, reviews of Play Sufficiency Assessments and the views of children are all responded to.
 - Monitoring processes reflect that play sufficiency is a process and that it is concerned with creating the conditions for play, rather than just providing quantitative data.
-

Key recommendation 3

Ensure that any plans for recovery from the pandemic and cost of living crisis consider children's right to play.

Suggested milestones

- Consider the survey work with children undertaken for Play Sufficiency Assessments and other studies.
- Consider the findings of the Equality and Social Justice Committee's Childcare and parental employment: the pandemic and beyond inquiry to address issues relating to the pandemic's impact on childcare and playwork provision.
- Ensure that the support to help local authorities plan and provide for sustainable playwork provision also guides them to make use of data from the Childcare Sufficiency Assessments and Play Sufficiency Assessments.
- Consider the impact of new funded initiatives or programmes that are designed to support COVID-19 recovery and may overlap with or duplicate existing playwork provision.

What will change

- The importance of children’s play for their health and wellbeing is recognised.
 - The sustainability of playwork provision is considered and addressed.
-

Key recommendation 4

Ensure that the implementation of the full breadth of the statutory Play Sufficiency Duty is adequately resourced and funded.

Suggested milestones

- Identify a funding stream for a dedicated and clearly defined play sufficiency role in every local authority in Wales.
- Ensure that the national infrastructure, including the role provided by Play Wales, is robust and sufficiently funded to support the increased expectations of play and playwork.
- Maintain an annual investment in play sufficiency (such as the All Wales Play Opportunity Grant) that provides a minimum level of funding and responds to emerging needs.
- Review the way annual investments (such as the All Wales Play Opportunities Grant) are allocated to local authorities. If necessary, revise the model to enable a better strategic allocation of available funding.
- Ensure that any guidance accompanying funding programmes highlights and strengthens the role of regional voluntary play associations and the voluntary play sector.
- Ensure that any guidance for complementary funding programmes explicitly clarifies where the funds can be used so that they support play, playwork and play sufficiency.
- Scrutinise the allocation of other funding programmes to identify the extent to which play, playwork and play sufficiency are supported.

What will change

- Local authority compliance with the implementation of the statutory Play Sufficiency Duty is supported.
 - Children’s right to play is recognised as a cross-cutting theme within policy areas and funded programmes that are aimed at children, families and communities.
 - A local authority-wide strategic approach to play sufficiency is developed and maintained.
 - Issues relating to recruitment and retention of play and playwork workforces are addressed.
 - Local authorities are better supported to implement the Play Sufficiency Duty through more strategic allocation of funding and resources.
 - The infrastructure of the voluntary play sector is strengthened and better equipped to take on both strategic and delivery roles.
-

Key recommendation 5

Support the delivery of a public information programme about the right to play.

Suggested milestones

- Work with Play Wales and provide sufficient ongoing investment to ensure that its *Playful Childhoods* campaign has the widest reach for greatest impact.
- Review and update other Welsh Government websites and communication activity aimed at the general public, with particular regard to ensuring consistent messaging.

What will change

- The importance of play for the health and wellbeing of children and wider society is better understood.
 - The importance of play is included in national guidance and publications.
-

Key recommendation 6

Apply the Play Sufficiency Duty more widely to include a range of other bodies.

Suggested milestones

- Establish a Play Sufficiency Charter (or similar) and actively encourage a commitment to the Play Sufficiency Duty by public bodies that are not included in it.
- Identify the range of bodies (such as Public Health Wales, local health boards, school governing bodies, Public Service Boards, National Park Authorities, Town and Community Councils) to which the Play Sufficiency Duty might apply in the future.
- Consider the legislative timetable to explore extending statutory Play Sufficiency Duty to other bodies beyond Welsh local authorities.

What will change

- Children's right to play is acknowledged and embedded in national policies and practices.
 - The potential for the Play Sufficiency Duty to address other social policy agendas is realised.
-

Key recommendation 7

Ensure the right to play is sufficiently incorporated in strategic policy instruments and decisions.

Suggested milestones

- Consider how to integrate and include issues relating to play and play sufficiency within the Children's Rights Impact Assessment section of the Integrated Impact Assessment Review.

What will change

- The synergy between the Play Sufficiency Duty of the Children and Families (Wales) Measure 2010 and Rights of Children and Young Persons (Wales) Measure 2011 is recognised and accounted for.

Key recommendation 8

Ensure that the principle of play as a matter of spatial justice is recognised and understood throughout *Planning Policy Wales*.

Suggested milestones

- Review and revise *Technical Advice Note (TAN) 16 (Sport, Recreation and Open Space)*, to include the principle of spatial justice for children and child-friendly neighbourhoods beyond designated play spaces, so that it applies to all public space including school grounds.
- Use planning guidance to ensure that Play Sufficiency Assessments contribute to key evidence to inform Local Development Plans, Place Plans and other transport and spatial policy guidance.
- Support local authorities in developing supplementary planning guidance, referring to Public Health Wales' *Planning and Enabling Healthy Environments*.
- Change the language in planning guidance from 'play opportunities' to 'opportunities to play' to encourage a broader way of thinking that includes more than designated play spaces.
- Ensure that the principle of protecting open space, including school grounds and play space, features in Local Authority Supplementary Planning Guidance.
- Produce a planning policy guidance (PPG) note for developers, requiring them to take the Play Sufficiency Assessment duty into account when planning new developments.

What will change

- *Technical Advice Note 16* is consistent with the definitions of play environments included in *Wales – a Play Friendly Country*.
- Planning guidance reflects language used in *Wales – a Play Friendly Country*.
- All planning professionals, including housing developers, are better equipped to consider and provide for children's play in line with national guidance.
- Communities are better consulted when the disposal of land, including school grounds, is being considered.
- Play spaces are protected when the disposal of land is being considered.
- The protection of playing fields and open space from development as set out in *Planning Policy Wales Edition 11*, is reflected in Local Authority Supplementary Planning Guidance.

Key recommendation 9

Ensure that the views and experiences of children inform the ways in which neighbourhoods are planned and managed.

Suggested milestones

- Commission and support research into spatial justice and opportunities for play for specific groups of children, including those living in rural areas.
- Ensure that the review of the *Play Sufficiency Assessment Toolkit* encourages and supports local authorities in developing child-friendly consultation programmes at neighbourhood level. It should include hyperlocal research with children using spatial and creative methods.

- Encourage Town and Community Councils to use their power to appoint youth representatives or set up youth councils, as set out in the Local Government (Wales) Measure 2011.

What will change

- The views of children are responded to and children are supported to be active agents and participate in the play sufficiency process.
 - Play Sufficiency Assessments and action plans, as well as Local Development Plans and Place Plans better reflect the views, needs and preferences of children.
-

Key recommendation 10

Ensure there are adequate safeguarding arrangements in playwork settings.

Suggested milestones

- Commission an independent review of the arrangements for safeguarding children in settings where they are unaccompanied by their parents or carers, other than schools and colleges and including settings currently captured by the Child Minding and Day Care Exceptions (Wales) Order 2010 (as amended).
- Work with key stakeholders to ensure that unregulated playwork settings are aware of the Voluntary Code of Safeguarding Practice and sign up to commit to using it in practice.

What will change

- Safeguarding arrangements in playwork settings are understood and implemented.
-

Key recommendation 11

Review child minding and day care regulations and orders relating to playwork.

Suggested milestones

- Review the practice and delivery of the Care Inspectorate Wales inspection regime relating to playwork to improve its fitness for purpose within the current regulations. This should inform changes to the National Minimum Standards (NMS) and the regulation and inspection of all playwork settings and should also include the development of standalone NMS for open access playwork settings.
- Review and consult on the Child Minding and Day Care Exceptions (Wales) Order 2010 (as amended), which requires the registration of all provision operating over two hours a day or six days a year. Review the coaching and tuition exceptions and the prohibition of voluntary registration of such settings.
- Review and update the definition of open access playwork and the settings where it takes place and make relevant revisions to the National Minimum Standards for Regulated Childcare Provision (NMS).
- Amend the requirement in the Child Minding and Day Care (Wales) Regulations 2010 (as amended) to register the location of a setting so that peripatetic open access play services and out of school settings can register once with a risk-benefit approach to adding additional locations.

What will change

- A proportionate application of the NMS is understood and implemented for playwork settings.
 - A rigorous system that ensures safeguarding arrangements and staff suitability is maintained in all playwork settings.
 - Regulations, registration and inspection that impact on playwork settings are updated and made more fit for purpose.
-

Key recommendation 12

Develop a strategic infrastructure for playwork workforce development.

Suggested milestones

- Formalise the role of Playwork Education and Training Council Wales (PETC Wales), as a key consultee with Qualifications Wales to support the consideration of new requests for the approval of qualifications for playwork.
- As a short to mid-term arrangement, formalise and resource the current arrangement of sector skills representation being provided by PETC Wales with Play Wales providing the secretariat and support.
- In the medium to long term, consider an appropriate organisation to co-ordinate the different functions of sector skills support for playwork in Wales. This should take account of the evolving roles of PETC Wales, Social Care Wales and the Education Workforce Council, as well as Regional Skills Partnerships.
- Use findings from the independent review into the professional registration of the early years and childcare workforce to inform decisions about a professional registration system for playwork.
- Consult on the support for the professional registration of the playwork workforce. If supported by the sector, identify an appropriate body to undertake the role, whilst ensuring reciprocal arrangements between regulators.
- Support and resource the playwork sector to implement up-to-date quality assurance schemes developed by and for the sector.

What will change

- Roles and responsibilities for sector skills support are understood and the playwork sector has clear strategic representation.
 - Playwork qualifications are suitable and meet the needs of the sector.
 - Playwork is recognised as an important part of the children's workforce.
 - A mechanism for assessing the suitability of staff is implemented.
 - Playwork providers develop a shared understanding of what constitutes quality playwork and how it may be achieved.
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Key recommendation 13

Ensure sufficient funding is available for play and playwork workforce development.

Suggested milestones

- Consider the specific requirements of the playwork sector and playworkers in the development of future funding schemes to support training and professional development within the sector.
- Plan for and fund a sustainable option to replace the Progress for Success programme which ends in March 2023. Use the findings from the *Welsh Play Workforce Study 2021* to ensure strategic development and take a collaborative rather than competitive approach to the allocation of funding for training and qualifications.
- Use findings from Play Sufficiency Assessments, Childcare Sufficiency Assessments and the *Welsh Play Workforce Study 2021* to inform the planned review and implementation of the Welsh Government's 10-year plan for the early years, childcare and play workforce.
- Commit to funding the continuing professional development of the wider play workforce, for example through training, professional development programmes or multi-agency conferences.
- Work with the sector to agree guidance on pay scales, recruitment practices and terms and conditions for playwork.
- Use play sufficiency research to inform the development and delivery of cross-professional training on spatial justice issues for children, to include specifically those involved in planning, active travel and the police.

What will change

- The future delivery of playwork qualifications is strategically resourced and planned for.
- Evaluations and workforce research findings are used to plan strategically for workforce development.
- Issues of recruitment and retention within the playwork workforce are addressed.
- The play needs of children and the impact of decisions on play are recognised by a wide range of professionals.

Key recommendation 14

Promote the importance of play and the use of school grounds as a community asset for play through community focused school policy.

Suggested milestones

- Ensure that the importance of play is embedded in the training and knowledge base of all school staff, including senior leaders.
- Ensure that the Health and Safety Executive (HSE) high-level statement on play and risk-benefit assessment (RBA) features in any guidance for schools relating to health and safety about play, activities, and the use of school facilities.
- Issue guidance to school governing bodies reminding them of children's right to play and of the expectation that they make sure their school accommodates this right.

- Update the guidance for use of school facilities beyond the school day to include information about encouraging opportunities for play and playwork provision. Use this guidance to inform grant allocations to schools.
- Ensure that any legislation developed to support the rollout of the community school initiative includes explicit reference to the Play Sufficiency Duty placed on local authorities.

What will change

- A full appreciation of the value of play and how to support it for its own sake in schools is facilitated.
- RBA as a key component of policy and practice is embedded in schools.
- The right to play is better supported through all aspects of the school day.
- Schools are recognised and used as neighbourhood places for play.

Key recommendation 15

Increase and improve play and break times in schools.

Suggested milestones

- Request that Estyn considers its role in supporting improvement in play through its inspection and building capacity work.
- Request that Estyn works with partners and contributes to professional learning that supports excellence and equity in play.
- Ensure that current plans for school day reform include guidance for a minimum length for play and break times in school.
- Ensure that the initiative to extend the school day includes an option for children to use the additional time to play.
- Ensure, through design guidance, that school indoor, landscape and playground design supports the inclusion of play features in new school design from the outset.
- Ensure schools are signposted to good practice guidance to enable them to provide daily outdoor opportunities to play for children.
- Ensure that Estyn and Care Inspectorate Wales are familiar with and have a good understanding of the Health and Safety Executive (HSE) high-level statement on play and RBA and that it appropriately informs their respective inspections.

What will change

- Playtime is prioritised and safeguarded as part of whole school policies.
- Education settings for all ages provide quality outdoor and indoor spaces for play and both are seen as equally important in assessments.
- The inspection process acknowledges risk-benefit assessment.

Annex 1: Steering Group membership

Representatives

Association of Directors of Education in Wales (ADEW) representatives

Care Inspectorate Wales (CIW) (non-voting member)

Children in Wales

Clybiau Plant Cymru Kids' Clubs

Cwlwm partnership:

 Clybiau Plant Cymru Kids' Clubs

 Early Years Wales

 Mudiad Meithrin

 National Day Nurseries Association (NDNA) Cymru

 Professional Association for Childcare and Early Years (PACEY) Cymru

Design Commission for Wales

Education Training Standards Wales

Education Workforce Council

Estyn

Fields in Trust Cymru

Gwent Office of Police and Crime Commissioner

Independent academic advisers:

 Cardiff Metropolitan University – Chantelle Haughton

 Cardiff University – Dr Matluba Khan

 Rethinking Childhood – Tim Gill

 Swansea University – Dr Pete King

 University of Gloucestershire – Dr Wendy Russell

Local authorities:

 Swansea Council

 Vale of Glamorgan Council

 Wrexham County Borough Council

Learning through Landscapes

National Independent Safeguarding Board

Natural Resources Wales

Office of the Children's Commissioner for Wales

One Voice Wales

Out of school clubs:

Little Lambs Day Nursery

Dexters Holiday Club

Play Wales – Steering group report drafting responsibility

Welsh Government – Project Senior Responsible Owner (SRO) and secretariat

Public Health Wales

SkillsActive

Social Care Wales

The National Trust

Welsh Local Government Association (WLGA)

Welsh Government Interim Youth Work Board / Youth Work Strategy Implementation Board

Young Wales

Office of the Future Generations Commissioner for Wales – invited to become members, but not in a position to accept.

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Ministerial Review of Play

FINAL REPORT

Prepared by Play Wales for the Ministerial Review of Play Steering Group

January 2023

ISBN: 978-1-914361-08-1

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