

**Response from the Deputy
Minister for Social Services to the
independent steering group
recommendations outlined in the
Ministerial Review of Play report,
published on 3 February 2023**

23 October 2023

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Introduction

In Autumn 2019, the Welsh Government launched a Ministerial Review of Play facilitated by an external steering group made up of cross-professional play and playwork specialists. The [aim of the review](#) was to assess where Wales is with respect to play policy and to inform how the Welsh Government develops and progresses the play agenda in future years. The review also considered the progress made in achieving the Welsh Government's vision for play and whether the vision remains relevant. It set out the steps that need to be taken to progress the play agenda to achieve the vision.

Due to the need to respond urgently to the Covid-19 pandemic, the Ministerial Review of Play was put on hold temporarily. Restarting the review was a key priority for the Welsh Government and steering group meetings recommenced in November 2021. Following feedback from members, plans were revised to allow for more in-depth discussion, with the aim of producing a broad and well-framed final report. This led to Play Wales facilitating the following thematic workshops supported by Welsh Government officials:

- Theme 1: Alignment of key legislation that impacts on the right to play
- Theme 2: Play Sufficiency Duty and funding
- Theme 3: Spatial justice
- Theme 4: Playwork provision and regulation
- Theme 5: Workforce and qualifications
- Theme 6: Play and education

With support from the Steering Group, Play Wales coordinated the drafting of the final [report](#) and background paper which was welcomed by the Deputy Minister for Social Services in February 2023.

The Steering Group's report includes a table of fifteen key recommendations, supported by suggested milestones on how the anticipated outcomes of the steering group could be achieved.

This response from the Deputy Minister for Social Services explains how the Welsh Government intends to proceed in taking forward, or in some cases exploring further, the recommendations and suggested milestones outlined in the Ministerial Review of Play report. The response also sets out the actions that will be undertaken in order to achieve the Steering Group's anticipated results.

Recommendations

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

Welsh Government response: Accept.

Welsh Ministers agree that children's rights are everyone's responsibility which is why children and young people are reflected in several portfolios across the Welsh Government and are at the forefront of the Cabinet's collective thinking and policymaking. This collective responsibility for children across the Cabinet supports the Welsh Government in working strategically across policy areas and brings a focus on the rights of the child and rights to play.

Play Policy officials will establish a Welsh Government Play Review Implementation Board, which, to ensure continuity, will comprise of Welsh Government policy officers whose remit links to play. Many of these were members of the Ministerial Review of Play Project Board. The Board will engage with the relevant stakeholders on policy reforms related to Play.

The Board will meet on a six-monthly basis to review the delivery of agreed actions to support the implementation of the key recommendations made within the Ministerial Review of Play Report. The Deputy Minister for Social Services will provide an annual update on the progress made on taking forward the activities outlined within this response, with the first report being expected in Autumn 2024.

The Play Review Implementation Board will provide strategic oversight on the implementation of the recommendations relating to their policy areas and work collaboratively to ensure that their respective Ministers are updated on any actions and review actions undertaken to achieve the Steering Group's anticipated results outlined below:

- 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 policy 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 emergency all consider the issues that impact on play.

Suggested Milestones		Action	Timescale Short term: by March 2024 Medium term: by March 2025 Long term: by May 2026
1.1	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.	<p>No action required.</p> <p>Four Welsh Ministers have responsibility for children within their portfolios:</p> <ul style="list-style-type: none"> • The Deputy Minister for Social Services • The Minister for Health and Social Services (Cabinet Member) • The Deputy Minister for Mental Health and Wellbeing • The Minister for Education and Welsh Language (Cabinet Member) <p>As the Welsh Government and its Cabinet are signatories of the United Nations Convention on the Rights of the Child (UNCRC), all advice to Welsh Ministers must have regard to the Convention and the rights of children. This collective responsibility for children across the Cabinet supports the Welsh Government in working strategically across policy areas and brings a focus on the rights of the child across government, rather than silo children into a single portfolio area. I consider this sufficient to comply with the recommendation.</p>	N/A

Suggested Milestones		Action	Timescale Short term: by March 2024 Medium term: by March 2025 Long term: by May 2026
1.2	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.	Play Policy officials will set up an internal Ministerial Review of Play Implementation Board. Membership will consist of representatives from each of the key policy areas. The first Board meeting will take place in the Autumn 2023 and be held on a six-monthly basis. Key external stakeholders will be invited to attend, as appropriate.	Short term
1.3	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.	Play Policy officials will review and refresh the play policy and legislation mapping documents shared with the Ministerial Review of Play Steering Group. These documents will be updated on at least a six-monthly basis and shared with the Play Review Implementation Board.	Short term
1.4	Identify departmental play champions across policy areas.	The Play Review Implementation Board members will nominate Welsh Government policy representatives who will promote the importance of play within their policy area.	Short term
1.5	Ensure that play sufficiency legislation is explicitly included in other policy guidance to ensure cross-policy scrutiny nationally and cross-policy implementation locally.	Play Implementation Review Board members will be asked to consider whether reference to play should be included in any guidance they are introducing or updating. In addition, Play Policy officials have regular contact with key policy areas and where appropriate, play sufficiency and the importance of play will be recommended for inclusion in key policy areas.	Short term

Suggested Milestones		Action	Timescale Short term: by March 2024 Medium term: by March 2025 Long term: by May 2026
1.5 cont		Cross policy working is already being implemented, for example the Play Sufficiency Duty to feature in the Active Travel Fund and Community Focused Schools revenue and capital funding guidance.	
1.6	Ensure that new and emerging policies such as the Anti-Racist Wales Action Plan and plans which address the climate and nature emergency are reflected in play sufficiency guidance and the Welsh Government's action plan.	Play Policy officials will work with policy colleagues across the Welsh Government via the Play Review Implementation Board to ensure any new and emerging policies, where relevant, have regard to play sufficiency.	Short term

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

Welsh Government response: Accept.

Play Policy officials will engage with key stakeholders in reviewing and refreshing the Play Sufficiency Duty tools and supporting statutory guidance to achieve the Steering Group’s anticipated results outlined below:

- 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.

Suggested Milestones		Action	Timescale Short term: by March 2024 Medium term: by March 2025 Long term: by May 2026
2.1	Review, refresh and relaunch the statutory guidance <i>Wales – a Play Friendly Country</i> .	Play Policy officials are working with Play Wales, and the Play Sufficiency National Network, to refresh the Play Sufficiency Assessment Toolkit and supporting statutory guidance - Wales - a Play Friendly Country	Short term
2.2	Update the <i>Play Sufficiency Assessment Toolkit</i> 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.	See 2.1	Short term

Suggested Milestones		Action	Timescale Short term: by March 2024 Medium term: by March 2025 Long term: by May 2026
2.3	Develop explicit guidance and update the <i>Play Sufficiency Assessment Template</i> , to ensure a consistent reporting system that reflects the diversity of contexts for play sufficiency across local authorities.	In line with 2.1, we will work with the sector to develop an updated template and supporting guidance.	Short term
2.4	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).	Play Policy officials will outline the findings highlighted by the Play Sufficiency National Network. They will present the challenges local authorities encounter in meeting the 9 Play Sufficiency Assessment Matters to the Play Review Implementation Board, suggesting potential solutions for their consideration.	Short term
2.5	Identify and implement interventions that support solutions to these challenges (listed above).	See 2.4	Short term

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

Welsh Government response: Accept.

The Welsh Government places great value on play and its importance in the lives of children in our society.

Access to high quality play opportunities is critical for the social, emotional and physical development of all children and may mitigate the negative effects of poverty on children's lives and help to build their resilience. Such experiences benefit children in terms of their health, happiness and wellbeing, and lay the foundation for reaching their full potential in adult life. They also contribute to children's learning, development and future life prospects.

The Welsh Government welcomes the publication of the Play Wales analysis of the 2022 Play Sufficiency Assessments "State of Play" and a report "[What children say about play in Wales: 2022](#)" drafted by David Dallimore. The Play Policy team will review actions undertaken to achieve the Steering Group's anticipated results outlined below:

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

Suggested Milestones		Action	Timescale Short term: by March 2024 Medium term: by March 2025 Long term: by May 2026
3.1	Consider the survey work with children undertaken for Play Sufficiency Assessments and other studies.	The Play Review Implementation Board will consider and disseminate the key findings from the Play Sufficiency Assessment survey work with children and other studies.	Medium term
3.2	Consider the findings of the Equality and Social Justice Committee's <i>Childcare and parental employment: the pandemic and beyond inquiry</i> to address issues relating to the pandemic's impact on childcare and playwork provision.	The Welsh Government provided a detailed response (https://senedd.wales/media/hg5pnmap/gen-ld15034-e.pdf) to the recommendations made by the Equality and Social Justice Committee's report.	Complete

Suggested Milestones		Action	Timescale Short term: by March 2024 Medium term: by March 2025 Long term: by May 2026
3.3	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	See 2.1	Short term
3.4	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.	Play Policy officials will take this into account if new funding is made available.	Medium term

Key recommendation 4: Ensure that the implementation of the full breadth of the statutory Play Sufficiency Duty is adequately resourced and funded.
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Welsh Government response: Accept in principle.

The Welsh Government core funds Play Wales, the organisation which champions children's right to play, and the Cwlwm childcare consortium made up of 5 organisations delivering a bilingual integrated service which aims to ensure the best possible outcomes for children and families across Wales.

When the Play Sufficiency Duty was introduced, it was agreed with the Welsh Local Government Association that it would be on a cost neutral basis. The Welsh Government agreed to provide funding to local authorities via the All Wales Play Opportunities Grant as and when it becomes available.

Since the Play Sufficiency Duty was introduced in November 2012, the Welsh Government has made £30.330m revenue funding available to local authorities to enable them to meet the requirements.

For the financial years 2020-2021 and 2021-2022, the Welsh Government awarded local authorities a total of £8m Covid recovery capital funding. The capital funding gave local authorities the flexibility to purchase large scale items and refurbish playgrounds and access to playgrounds; this was dependent on the priorities identified in their Play Sufficiency Assessments.

Play Policy officials will keep under review funding options to support the implementation of the full breadth of the statutory Play Sufficiency Duty in working towards the Steering Group's anticipated results outlined below:

- 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.

Suggested Milestones		Action	Timescale Short term: by March 2024 Medium term: by March 2025 Long term: by May 2026
4.1	Identify a funding stream for a dedicated and clearly defined play sufficiency role in every local authority in Wales.	The Welsh Government will continue to consider the funding requirements for local authorities to deliver their statutory duty.	Long term
4.2	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.	The Welsh Government places great value on play and play opportunities for children. The Welsh Government core funds Play Wales and is exploring avenues to maximise the funding for play.	Long term
4.3	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.	See 4.1	Long term
4.4	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.	The Welsh Government provides funding to the 22 local authorities through the Playworks Holiday Project. The Welsh Government will consider options to provide funding to local authorities to deliver opportunities for play.	Long term
4.5	Ensure that any guidance accompanying funding programmes highlights and strengthens the role of regional voluntary play associations and the voluntary play sector.	Welsh Government funding guidance for local authorities encourages work with the third sector and community groups when creating play opportunities. Play Policy officials will continue to raise awareness with key Welsh Government policy areas.	Short term

Suggested Milestones		Action	Timescale Short term: by March 2024 Medium term: by March 2025 Long term: by May 2026
4.6	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.	See 4.5	Short term
4.7	Scrutinise the allocation of other funding programmes to identify the extent to which play, playwork and play sufficiency are supported.	The Play Review Implementation Board members will consider funding streams in their policy areas and review options for funding play, playwork and play sufficiency.	Short term

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

Welsh Government response: Accept.

The Welsh Government is committed to promoting children and young people's right to play and will continue to work with the sector to support the delivery of public information to meet the Steering Group's anticipated result outlined below:

- The importance of play for the health and wellbeing of children and wider society is better understood.

Suggested Milestones		Action	Timescale Short term: by March 2024 Medium term: by March 2025 Long term: by May 2026
5.1	Work with Play Wales and provide sufficient ongoing investment to ensure that its <i>Playful Childhoods</i> campaign has the widest reach for greatest impact.	The Welsh Government will continue working with Play Wales to highlight Playful Childhoods in wider communications and look at ways to achieve greatest impact. The Welsh Government funded and supported the launch of the Play Wales film "this is why play is so important" which celebrates and highlights the importance of play.	Short term - ongoing
5.2	Review and update other Welsh Government websites and communication activity aimed at the general public, with particular regard to ensuring consistent messaging.	Play Policy officials will continue to raise awareness and work with key policy areas to ensure messages related to children's play are consistent. Play Policy officials will consider how we can use our communications more widely to highlight the importance of play and ensure consistency of messaging.	Medium term

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

Welsh Government response: Accept in principle.

Wales was the first country to legislate for play as part of the Children and Families (Wales) Measure 2010, guaranteeing children's right to play by ensuring local authorities secure sufficient opportunities, via the Play Sufficiency Duty. A statutory duty was placed on local authorities to assess and, as far as is reasonably practicable, secure sufficient opportunities for children to play in their areas. This has become known as the 'Play Sufficiency Duty'. Play Policy officials will continue to work with the sector and key stakeholders in raising awareness of the Play Sufficiency Duty and in considering the suggested milestones in achieving the Steering Group's anticipated results outlined below:

- 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.

Suggested Milestones		Action	Timescale Short term: by March 2024 Medium term: by March 2025 Long term: by May 2026
6.1	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.	Play Policy officials will explore the implementation of a Play Sufficiency Charter with the Play Review Implementation Board, however, ultimately, this is a decision for Welsh Ministers.	Long term
6.2	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.	Play Policy officials will explore the option of expanding the Play Sufficiency Duty with the Play Review Implementation Board, however this would require legislative change and so would be subject to the Senedd legislative process.	Long term

Suggested Milestones		Action	Timescale Short term: by March 2024 Medium term: by March 2025 Long term: by May 2026
6.3	Consider the legislative timetable to explore extending statutory Play Sufficiency Duty to other bodies beyond Welsh local authorities.	This links to 6.1 and 6.2.	Long term

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

Welsh Government response: Accept.

Play and play sufficiency is sufficiently incorporated within the Children's Rights Impact Assessment section of the Integrated Impact Assessment. Therefore, I believe that we have met the Steering Group's anticipated results outlined below:

- 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.

Suggested Milestones		Action	Timescale Short term: by March 2024 Medium term: by March 2025 Long term: by May 2026
7.1	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.	<p>Section 3 of the current CRIA template has the following question:</p> <ul style="list-style-type: none"> • <i>How does your proposal enhance or challenge children's rights, as stipulated by the UNCRC articles and its Optional Protocols? Please refer to the articles to see which ones apply to your own policy.</i> <p>Welsh Government policy officials review each of the Articles (including Article 31 – the right to play) and consider how their proposal enhances or challenges each Article. The UNCRC is considered in its entirety.</p>	Short term

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

Welsh Government response: Accept.

Play Policy officials will work with internal and external stakeholders to take forward the actions to support the implementation of this key recommendation. Planning Policy Wales places importance on the protection of open space, playing fields or development in the countryside. New developments should improve the quality of place and create safe, social, attractive streets where people want to walk, cycle and enjoy, and where children can play. Planning Policy Wales recognises the impact of the Children and Families (Wales) Measure 2010, which places a duty on local authorities to secure sufficient play opportunities for children. The Play Review Implementation Board will consider and take forward the Steering Group's anticipated results outlined below:

- *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.

Suggested Milestones		Action	Timescale Short term: by March 2024 Medium term: by March 2025 Long term: by May 2026
8.1	Review and revise <i>Technical Advice Note (TAN) 16 (Sport, Recreation and Open Space)</i> , to include the principle of spatial justice for children and child-friendly neighbourhoods beyond designated play spaces, so that	Technical Advice Notes elaborate on policy established in Planning Policy Wales to ensure that national planning policy is fit for purpose. When Technical Advice Note (TAN) 16 (Sport, Recreation and Open Space) is	Long term

Suggested Milestones		Action	Timescale Short term: by March 2024 Medium term: by March 2025 Long term: by May 2026
8.1 cont	it applies to all public space including school grounds.	revised, Welsh Government officials will work collaboratively to consider Planning Policy Wales to ensure that opportunities to play are appropriately considered.	
8.2	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.	Welsh Government officials will work with colleagues to ensure Planning Policy Wales encourages local authorities to consider opportunities to play across the planning process and how local authorities are guided to incorporate and consider information from a range of sources as part of their planning processes.	Long term
8.3	Support local authorities in developing supplementary planning guidance, referring to Public Health Wales' <i>Planning and Enabling Healthy Environments</i> .	The Welsh Government commissioned Public Health Wales to develop a collection of documents entitled Planning and Enabling Healthy Environments (https://www.gov.wales/planning-policy-wales) to address increasing levels of obesity across Wales. The documents contribute to the creation of healthy environments, including healthy weight, by setting out the importance of local based planning and facilitation of active environments.	Short term
8.4	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.	Linked to 8.1 and 8.2.	Long term

Suggested Milestones		Action	Timescale Short term: by March 2024 Medium term: by March 2025 Long term: by May 2026
8.5	Ensure that the principle of protecting open space, including school grounds and play space, features in Local Authority Supplementary Planning Guidance.	<p>Planning Policy Wales requires regard to the protection of open space, playing fields or development in the countryside.</p> <p>The policy sets out that all playing fields whether owned by public, private or voluntary organisations, should be protected from development, except where:</p> <ul style="list-style-type: none"> • “facilities can best be retained and enhanced through the redevelopment of a small part of the site; • alternative provision of equivalent community benefit is made available locally, avoiding any temporary loss of provision; or • there is an excess of such provision in the area.” <p>Welsh Government officials will work with colleagues to ensure Planning Policy Wales and other associated guidance encourages consideration of opportunities to play.</p>	Long term
8.6	Produce a planning policy guidance (PPG) note for developers, requiring them to take the Play Sufficiency Assessment duty into account when planning new developments.	Welsh Government officials will address this requirement through changes to Planning Policy Wales.	Long term

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

Welsh Government response: Accept.

The Play Review Implementation Board will consider the work and recommendations of the Play Sufficiency National Network and work with the Democratic Health Task and Finish Group in taking forward actions to support the Steering Group's anticipated results outlined below:

- 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.

Suggested Milestones		Action	Timescale Short term: by March 2024 Medium term: by March 2025 Long term: by May 2026
9.1	Commission and support research into spatial justice and opportunities for play for specific groups of children, including those living in rural areas. Be sure to include recommendations for action.	The Play Review Implementation Board will consider recommendations from the Play Sufficiency National Network with regards to research into spatial justice and opportunities for play.	Medium term
9.2	Ensure that the review of the <i>Play Sufficiency Assessment Toolkit</i> 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.	This links to actions within 2.2 and 2.3, and will be considered as part of the review, refresh and relaunch of play sufficiency assessment guidance and toolkit.	Short term

Suggested Milestones		Action	Timescale Short term: by March 2024 Medium term: by March 2025 Long term: by May 2026
9.3	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.	The Welsh Government has established a Democratic Health Task and Finish Group to increase young peoples' engagement and participation in community councils. As part of developing and taking forward the Interim Youth Board's recommendations , work is underway to consider how to establish a young person led governance model.	Medium term

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

Welsh Government response: Accept.

Safeguarding and protecting children is everybody's responsibility.

In January 2022 the Welsh Government published the [*Working Together to Safeguard People: Code of Safeguarding Practice*](#), providing advice for anyone who offers services or activities for children and adults who may be at risk. The Code sets out the Welsh Government's expectations in relation to core safeguarding arrangements and enables individuals, groups and organisations to demonstrate that reasonable steps are being taken to ensure the safety of children and adults at risk.

During this Senedd term, in [*response to Recommendation 13*](#) of the Independent Inquiry into Child Sexual Abuse – for a statutory duty to report children at risk of sexual abuse, to be placed on a wide range of individuals who work closely with young people – the Welsh Government has committed to building on the Code of Safeguarding Practice by engaging widely and exploring views on ensuring that those who provide services or offer activities for children and for adults who may be at risk, have proportionate and effective safeguarding arrangements in place. The Play Review Implementation Board members will be engaged in this activity.

In addition, the Welsh Government has recently published the [*Early Childhood Play, Learning and Care Quality Framework*](#), which draws together key requirements for delivering the kind and standard of provision we want in Wales. It explains that safeguarding means keeping people safe from abuse, neglect or harm and knowing what to do if a child is at risk. It includes links to the Wales Safeguarding Procedures and Social Care Wales safeguarding awareness training. The Reflective Practice Toolkit, accompanying the framework, includes a quality standard around safeguarding babies and young children from harm, abuse and neglect.

The Quality Framework has been published in draft, whilst engagement takes place with a wide range of practitioners on its implementation, the aim is to publish final versions of the documents in Summer 2024. We will undertake activities to support the Steering Group's anticipated results outlined below:

- Safeguarding arrangements in playwork settings are understood and implemented.

Suggested Milestones		Action	Timescale Short term: by March 2024 Medium term: by March 2025 Long term: by May 2026
10.1	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).	This will form part of the commitment made by the Welsh Government, in response to Recommendation 13 of the Independent Inquiry into Child Sexual Abuse – to engage widely and explore views on ensuring that those who provide services or offer activities for children and for adults who may be at risk have proportionate and effective safeguarding arrangements in place.	Long term
10.2	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.	<p>Welsh Government officials will work with key stakeholders to ensure that they are aware of the Working Together to Safeguard People: Code of Safeguarding Practice and encourage its adoption within their settings.</p> <p>The Code, published and cascaded in January 2022, was designed to raise awareness and provide advice for anyone offering activities for children or adults who may be at risk, on taking reasonable steps to help protect them from harm. It can be adopted and implemented in any setting and includes a link to Play Wales, as well as other sources of support.</p>	Short term - ongoing

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

Welsh Government response: Accept.

The Welsh Government will consider the outcome of the [review](#) undertaken in respect of the Child Minding and Day Care Exceptions (Wales) Order 2010 (as amended), the Child Minding and Day Care (Wales) Regulations 2010 (as amended), the National Minimum Standards and the legislative requirements underpinning the registration of open access play in order to take forward the Steering Group's anticipated results outlined below:

- 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.

Suggested Milestones		Action	Timescale Short term: by March 2024 Medium term: by March 2025 Long term: by May 2026
11.1	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.	<p>Play Policy and Childcare Policy officials will work with Care Inspectorate Wales and the playwork sector to review the practice and delivery of the registration and inspection regime relating to open access play settings.</p> <p>These officials will consider further changes to the National Minimum Standards for Regulated Childcare for children up to the age of 12 years (NMS) which was refreshed in May 2023 and consult on potential amendments to Regulations and the Standards.</p>	Medium term

Suggested Milestones		Action	Timescale Short term: by March 2024 Medium term: by March 2025 Long term: by May 2026
11.2	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.	The Welsh Government is currently reviewing the Child Minding and Day Care Exceptions (Wales) Order 2010 (as amended) to determine any relevant issues and whether it is still fit for purpose. Policy officials will engage with the relevant internal/external stakeholders to scope the issues and potential solutions to these. Any proposed changes will be the subject of consultation.	Medium term
11.3	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).	Play Policy officials will work with Play Wales to review and update the National Minimum Standards as required.	Medium term
11.4	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.	The Welsh Government will explore with Care Inspectorate Wales and stakeholders, changes required to the registration process to enable peripatetic open access play services and out of school settings to register once with a risk-benefit approach to adding additional locations.	Medium term

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

Welsh Government response: Accept

The Welsh Government is committed to supporting childcare and playwork practitioners to raise their skills levels through qualifications, access to structured training routes and clear career paths. The Welsh Government will work with the qualifications awarding bodies, with Social Care Wales and stakeholders to consider sector skills support for playworkers. The Welsh Government also recognises that the workforce provides crucial support in the earliest years of a child's life, laying firm foundations for their ongoing cognitive, emotional and social development.

The [Childcare, Play and Early Years Workforce Plan](#) is founded on the premise that children from all backgrounds should have the best start in life. A long-term ambition of the plan is to explore the introduction of professional registration for the childcare and playwork workforce. Policy officials will review the actions undertaken in working towards the Steering Group's anticipated results outlined below:

- Roles and responsibilities for sector skill 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.

Suggested Milestones		Action	Timescale Short term: by March 2024 Medium term: by March 2025 Long term: by May 2026
12.1	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.	The Welsh Government will support discussions between the Playwork Education and Training Council Wales (PETC Wales) and Qualifications Wales to determine PETC Wales' ongoing role in playworker qualifications.	Medium term

Suggested Milestones		Action	Timescale Short term: by March 2024 Medium term: by March 2025 Long term: by May 2026
12.1 cont		<p>Over the longer term, work will be undertaken with Social Care Wales (SCW), with the aim of SCW offering sector skills support for playworkers.</p> <p>This will be achieved via the amendment to the Regulation and Inspection of Social Care (Wales) Act 2016 which will enable the extension of the definitions of a social care worker to include all childcare and playwork workers.</p>	
12.2	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	Links to actions within 12.1	Medium term
12.3	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 the PETC Wales, Social Care Wales and the Education Workforce Council, as well as Regional Skills Partnerships.	As a result of amendments to the Regulation and Inspection of Social Care (Wales) Act 2016, the Welsh Government intends that Social Care Wales will provide sector skills support for playwork workers.	Long term
12.4	Use findings from the independent review into the professional registration of the	A Professional Registration Working Group was established in 2022 and includes representatives from playwork	Long term

Suggested Milestones		Action	Timescale Short term: by March 2024 Medium term: by March 2025 Long term: by May 2026
12.4 cont	early years and childcare workforce to inform decisions about a professional registration system for playwork.	organisations. A consultation will be launched in Autumn 2023 seeking the sector's view on registration, including the inclusion of playwork settings (unregistered and registered), in any future register.	
12.5	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.	See 12.4	Long term
12.6	Support and resource the playwork sector to implement up-to-date quality assurance schemes developed by and for the sector.	<p><u>The Early Childhood Play, Learning and Care (ECPLC) Quality Framework</u> was published in draft in June 2023 and will be finalised in June 2024 following feedback from the widest range of practitioners. The Framework aims to guide leaders and practitioners from across childcare and playwork settings and schools in delivering high quality provision for children aged 0 - 5.</p> <p>The Welsh Government core funds Play Wales, who recently finalised Chwarae o Safon - the playwork quality mark.</p>	Short term

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

Welsh Government response: Accept.

The Welsh Government's ambition to develop a skilled childcare and playwork workforce that is regarded as a career of choice, is set out in our 10-year [Childcare, Play and Early Years workforce plan](#). A review and refresh of our 10-year Early Years, Childcare and Play Workforce Plan is being undertaken this year with a clear focus on how we can support sustainability, recruitment and retention in the sector. We are committed to supporting childcare and playwork practitioners to raise their skills levels through qualifications, access to structured training routes and clear career paths. Play Policy officials will review cross policy work and actions in working towards the Steering Group's anticipated results outlined below:

- 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.

Suggested Milestones		Action	Timescale Short term: by March 2024 Medium term: by March 2025 Long term: by May 2026
13.1	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.	The Training and Support Programme is intended to replace the European funded Progress for Success programme by funding the provision of three separate playwork qualifications.	Short term

Suggested Milestones		Action	Timescale Short term: by March 2024 Medium term: by March 2025 Long term: by May 2026
13.2	Plan for and fund a sustainable option to replace the Progress for Success programme which ends in March 2023. Use the findings from the <i>Welsh Play Workforce Study 2021</i> to ensure strategic development and take a collaborative rather than competitive approach to the allocation of funding for training and qualifications.	Links to 13.1	Short term
13.3	Use findings from Play Sufficiency Assessments, Childcare Sufficiency Assessments and the <i>Welsh Play Workforce Study 2021</i> to inform the planned review and implementation of the Welsh Government's 10-year plan for the early years, childcare and play workforce.	A review and refresh of the Childcare, Play and Early Years Workforce Plan is anticipated for publication in Autumn 2023. It is intended that this will update the 10- year plan to reflect on progress to date and work to be undertaken over the remainder of this Senedd Term.	Short term
13.4	Commit to funding the continuing professional development of the wider play workforce, for example through training, professional development programmes or multi-agency conferences.	The Welsh Government core funds Play Wales and they have a specific funding objective around workforce development, which enables them to provide training and continuous professional development for the wider workforce.	Short term

Suggested Milestones		Action	Timescale Short term: by March 2024 Medium term: by March 2025 Long term: by May 2026
13.5	Work with the sector to agree guidance on pay scales, recruitment practices and terms and conditions for playwork.	Recruitment practices advice is currently available via Social Care Wales for the whole childcare and playwork sector. Consideration of how we can further progress these issues will be part of the review and refresh of the Childcare, Play and Early Years Workforce Plan due for publication in Autumn 2023.	Long term
13.6	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.	Play Policy officials will take forward the recommendations from the Play Sufficiency National Network with regards to training requirements.	Short term

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.

Welsh Government response: Accept.

The [Welsh Government Community Focused Schools guidance](#) recognises the importance of play in supporting the wellbeing of children and young people, ensuring they have time and space to play and to express themselves. Community Focused Schools place children at the heart of their approach. They are a key part of the local community, offering opportunities to use the school facilities for adult learning, wellbeing, play, sporting, cultural and other community activities. Play Policy officials will review the progress of cross policy working and collaboration to meet the Steering Group's anticipated results outlined below:

- A full appreciation of the value of play and how to support it for its own sake in schools is facilitated.
- Risk-benefit assessment 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.

Suggested Milestones		Action	Timescale Short term: by March 2024 Medium term: by March 2025 Long term: by May 2026
14.1	Ensure that the importance of play is embedded in the training and knowledge base of all school staff, including senior leaders.	The Welsh Government will work with key partners in considering how the importance of play is incorporated in the professional learning resources for school practitioners.	Medium term
14.2	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.	Consideration will be given to including the Health and Safety Executive high-level statement on play and risk-benefit assessment in guidance for schools on use of school facilities.	Medium term

Suggested Milestones		Action	Timescale Short term: by March 2024 Medium term: by March 2025 Long term: by May 2026
14.3	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.	<p>The Welsh Government will update Chapter 25 of the School Governors' guide to the law which explains health and safety responsibilities, and matters relevant to pupil health, safety and welfare. The updated guidance will be shared with the relevant governing bodies.</p> <p>When updating the guidance for use of school facilities beyond the school day, the Welsh Government will consider what can be included from a Community Focused Schools perspective and inclusion of information on opportunities for play.</p>	Short term
14.4	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.	Links with 14.3	Medium term
14.5	Ensure that any legislation developed to support the rollout of the community school initiative includes explicit reference to the <i>Play Sufficiency Duty</i> placed on local authorities.	There is no legislation for Community Focused Schools currently being planned.	N/A

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

Welsh Government response: Accept.

The Welsh Government recognises play and break times are an important part of the school day, where children are supported to have time for play and socialising with their peers along with time to eat healthy meals. Play Policy officials will review actions taken forward in order to meet the Steering Group's anticipated results outlined below:

- 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.

Suggested Milestones		Action	Timescale Short term: by March 2024 Medium term: by March 2025 Long term: by May 2026
15.1	Request that Estyn inspects and reports on playtime against the benchmark provided by play sufficiency guidance.	The Welsh Government will work with Estyn in supporting the importance of play for children in schools.	Short term
15.2	Request that Estyn reports on instances of the removal – or threat of removal – of playtime as a sanction.	Links with 15.1	Short term
15.3	Ensure that current plans for school day reform include guidance for a minimum length for play and break times in school.	The Welsh Government supports the importance of play times for children and young people. Work on the structure and use of school time continues in the context of wider Welsh Government education reforms.	Short term

Suggested Milestones		Action	Timescale Short term: by March 2024 Medium term: by March 2025 Long term: by May 2026
15.4	Ensure that the initiative to extend the school day includes an option for children to use the additional time to play.	Welsh Government officials will continue to work across policy areas ensuring guidance and any supporting documentation / information for governing bodies is up to date and reflects any changes.	Long term
15.5	Ensure, through design guidance, that school indoor, landscape and playground design supports the inclusion of play features in new school design from the outset.	Welsh Government officials will continue to work across policy areas ensuring guidance and any supporting information supports the inclusion of play features in new school and childcare infrastructure.	Short term
15.6	Ensure schools are signposted to good practice guidance to enable them to provide daily outdoor opportunities to play for children.	Links to 15.4	Short term
15.7	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.	<p>Estyn and Care Inspectorate Wales have committed to liaise around this issue as part of their joint inspection programme.</p> <p>As part of Estyn's professional learning programme, the Inspectorate is committed to ensuring that inspectors have a good understanding of the HSE high-level statement on play and risk-benefit assessment to inform its work and is fully aware of the benchmark provided by the play sufficiency guidance.</p>	Short term

Suggested Milestones		Action	Timescale Short term: by March 2024 Medium term: by March 2025 Long term: by May 2026
15.7 cont		Care Inspectorate Wales childcare and play inspectors have received training on the importance of risk taking which was jointly delivered by Play Wales and Clybiau Plant Cymru Kids' Clubs on risky play and risk-benefit assessment. Care Inspectorate Wales also has inspectors who are play champions.	