

Towards Securing Sufficient Play Opportunities:

A short study into the preparation undertaken for the commencement of the second part of the Welsh Government's Play Sufficiency Duty to secure sufficient play opportunities

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June 2014

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Contents

Acknowledgements	3
Executive Summary	4
(i) Introduction.....	4
(ii) Repair and Maintenance	4
(iii) Relatedness.....	5
(iv) Rights	5
(v) Re-enchantment.....	6
(vi) Continuing to develop favourable conditions to support local authorities	7
(vii) Concluding remarks	8
1. Introduction	9
2. Framing for the report	12
3. Repair and Maintenance.....	13
3.1 Introduction	13
3.2 Low cost/no cost approaches	14
3.3 Additional funding for increasing play opportunities	16
3.4 Summary.....	19
4. Relatedness.....	19
4.1 Context.....	19
4.2 Intensifying partnership working.....	20
4.3 Extensive relationships	23
4.4 The collective wisdom of children	24
4.5 Issues of sustainability	25
4.6 Summary.....	27
5. Rights	28
5.1 Rights-based policy making.....	28
5.2 Rights, needs and outcomes: tensions in understandings of play’s value.....	31
5.3 Rights to participation	33
5.4 Summary.....	34
6. Re-enchantment	34
6.1 Introduction	34
6.2 An illustration.....	35
6.3 Challenges and experimentation	35
6.4 Summary.....	37

7. Continuing to develop favourable conditions to support local authorities	38
7.1 Introduction	38
7.2 The role of Statutory Guidance	39
7.3 Accountability	41
7.4 Coherence	42
7.5 Building collective wisdom.....	44
8. Concluding remarks	46

Acknowledgements

We would like to thank Play Wales for commissioning this small-scale research and facilitating our attendance at relevant events, and the Welsh Government officers for providing funding and sharing information. Thanks also go to those who agreed to be interviewed.

Executive Summary

(i) Introduction

This report is of a small-scale piece of research that re-engaged with stakeholders in an earlier research project¹ (hereafter '*LSW*') into the commencement of the first part of the Play Sufficiency Duty, Section 11 of the Children and Families (Wales) Measure 2010. The first project researched local authority approaches to the requirement to carry out Play Sufficiency Assessments (PSAs); this one looks back at what has happened since submission of the PSAs and forward to the commencement of the second part of the Duty. It continues to explore the complex relational and contingent particularities of the Play Sufficiency Duty recognising that

the relationship between social policy and play is not straight forward. Play is not only an activity that takes place in discrete spaces and at prescribed times; it is not something that can simply be 'provided' by adults, but is an act of co-creation that emerges opportunistically from an assemblage of interdependent and interrelated factors.²

It also continues the themes used in *LSW* that drew on Ash Amin's account of the good city,³ particularly his four registers of repair and maintenance, relatedness, rights and re-enchantment. These ideas can be readily adapted to form a framework for considering Wales as a play-friendly country (the 'good country', perhaps), and the four registers can be useful in looking at how they might combine to produce public spaces that are open to children's playful presence. In particular, this report foregrounds the importance of supporting the development of 'collective wisdom' about children's everyday playful relationships with their environments that builds on and goes beyond collection of 'data', embracing multiple ways of knowing that include local situated knowledge, stories, histories, relationships, affects, symbolic and material objects, intuitions and so on.

(ii) Repair and Maintenance

This first register looks at ways of repairing and maintaining spaces (dedicated play spaces, supervised play provision and the general environment) in order to make them more open for playing, acknowledging that 'space' is more than a neutral physical container for action, rather it is constantly in the process of being produced through encounters and relationships between people, materials, social practices, attitudes and so on.⁴ Action plans had been developed on a 'low cost/no cost' basis, as it was recognised that there was no additional funding at that stage. Generally, there was enthusiasm about the difference the PSA process and the action plans had made, particularly in terms of developing a broader, cross-departmental awareness of children's play. Yet there were also tensions regarding funding, not only because of the lack of identified budgets to support implementation of actions that did require funding, but also because the Play Sufficiency Duty was being brought in at a time of unprecedented public spending cuts in local authorities.

The additional funding, made available in January 2014, was welcomed and local authorities drew on their PSA action plans to make swift decisions about ways of spending the money that could both

¹ Lester, S. and Russell, W. (2013) *Leopard Skin Wellies, a Top Hat and a Vacuum Cleaner Hose: An analysis of Wales' Play Sufficiency Assessment duty*, Cardiff: Play Wales.

² Lester and Russell (2013) *Op. cit.*, p. 6.

³ Amin, A. (2006) 'The Good City', *Urban Studies*, 43(5/6), pp. 1009–1023.

⁴ Lester and Russell (2013) *op. cit.*, p. 34.

address priorities within the PSA and be spent in the required timescale. Proposals for spending the funds were spread across most Matters in the PSA, including playground improvements, purchase of peripatetic equipment and storage, resources for specific targeted groups of children, signage, road safety and play space access improvements, events and play sessions. However, the restrictions of short-term funding were also noted.

Whilst there was general enthusiasm for the commencement of the second part of the duty, there was also concern that funding constraints may both impede progress on specifics in action plans and also, more worryingly, lead to reductions in posts of key people with the experience, expertise and connections to drive things forward.

(iii) Relatedness

All the Matters within the PSA are fundamentally relational: children's and adults' lives shape and are shaped by intra-actions composed of diverse phenomena (people, materials, technology, policy pronouncements, tool kits and so on). The challenge presented by the Play Sufficiency Duty is to develop relationships that counter forms of marginalisation and disconnection in order to create and promote spaces in which different needs can co-exist rather than privilege the needs of one group (adults) over another (children). This register connects explicitly with the notion of cultivating collective wisdom across local authority departments and with local communities, particularly paying attention to the collective wisdom of children themselves. Partnership working therefore becomes a cornerstone at local, regional and national levels. The Welsh Government and key national organisations, notably Play Wales and the WLGA, have a significant role to play in this process; they are not detached bodies but are active and important elements within the entangled relationships among local authorities, local communities and children's everyday experiences. The PSA provided a strong momentum for developing these partnerships, one that was also boosted by the consultation on the Statutory Guidance on the second part of the Duty and particularly the injection of additional funding. Our research suggests that the momentum has largely been maintained, with partnership working becoming both more intensive and extensive in many areas, although this was not uniform or unproblematic. The challenge facing the Welsh Government, national organisations and local authorities in the implementation of the Play Sufficiency Duty is to weave webs of social justice and equality out of the prevailing circumstances. While there has been good progress made to date for many authorities, there were considerable counter forces and concerns expressed, most notably the ability to maintain this momentum at a time when local authorities are facing continued budget reductions, mixed messages about funding streams, uncertainty over local authority re-organisation plans and possible implications for the immediate and near future structure of partnerships, and the potential impact that a 'neutral cost' principle for the commencement of the second stage might have in term of local authority priorities.

(iv) Rights

Since its inception, the Welsh Government has taken a rights-based approach to policy concerning children and young people. The Play Sufficiency Duty represents an international lead on implementing the recommendation within the UNCRC General Comment on article 31 for governments to legislate for children's play. Feedback from the regional consultation events and in interviews showed a high level of appreciation of and support for the actions taken by the Welsh Government in passing this legislation and in commencing the Play Sufficiency Duty in full. Alongside this there was a sense that the Welsh Government could and should do more to explicitly support

local authorities, including through clearer cross-departmental working within the Welsh Government in order to avoid contradictory messages regarding permissible expenditure of funding streams such as Families First and Communities First in implementing the Play Sufficiency Duty; some form of Welsh Government reflection on what had been learned from the PSA process; and the balance between flexibility and prescription. This last recognises the experimental nature of the Duty, but there was considerable feeling that without stronger and clearer messages about what is required, local authorities could fall back on the 'as far as is reasonably practicable' phrase within the Duty to justify a lack of action, particularly given the uncertainties of public spending and local government reorganisation.

The rights-based approach to government actions regarding children's play allows for an understanding of play's intrinsic value, its capacity to enliven things for the time of playing, as well as the more dominant instrumental value of playing in terms of its potential to address social policy agendas such as learning and development, physical and mental health and obesity reduction, crime reduction, community cohesion and so on. Part B of the draft Statutory Guidance highlights these instrumental benefits, and there was a sense that children's universal right to play might be lost in this focus.

Children have a right to 'participative parity'⁵ in the public realm. Children's play represents participation in their everyday cultures and spaces, both public and institutional. The 'throwntogetherness'⁶ of public space means that children's everyday participation may rub up against the participation of more powerful others and this needs to be negotiated with openness to difference. This recognises rights as something held in common rather than individually, and proposes a competence rather than a deficit model. It also offers an alternative perspective to the concept of 'diverse needs' enshrined in Matter B of the PSAs, which encourages specific resources and measures for specific categories of children. Article 31 rights are about creating the conditions that support playing, and much of this is about a rebalancing in favour of accommodating difference and appreciating social aspects of life.

(v) Re-enchancement

This final register of Amin's conditions refers to the ways in which the everyday environments of children's lives can support moments of vitality and hopefulness expressed through playing. Local authorities have produced local and creative responses, although the PSA forms and the proposal forms for additional funding were framed in technical, measurable ways that perhaps discouraged experimental forms of innovation that were more apparent in discussions and interviews. While the formal implementation frameworks and requirements of the Play Sufficiency Duty with its sufficiency assessment, toolkit and action plans may have dominated the process to date, there has to be room for acknowledging the importance of these minor processes and the ways that they play out in the everyday lives of children.

The commitment that Welsh Government and local authorities have made to the Play Sufficiency Duty, as both part of the anti-poverty and children's rights policy framework, may be of considerable importance over the coming period. At a time when the UK Government's austerity programme is predicted to significantly increase levels of child poverty across the UK with families and children in

⁵ Amin (2006) *Op. cit.*

⁶ Massey, D. (2005) *For Space*, London: Sage.

Wales set to be hit particularly hard,⁷ there is great potential for a state of *disenchantment* to set in. Certainly it was there in the background in many of the interviews and consultation events. The uncertainty and insecurity that this inculcates is real, and these prevailing circumstances require close attention to be paid to ways in which local authorities can be supported in this endeavour.

(vi) Continuing to develop favourable conditions to support local authorities

This section of the report draws together the successes and challenges facing local authorities in the implementation of the Play Sufficiency Duty to make observations and suggestions regarding the ways in which Welsh Government and its national partners, the WLGA and Play Wales, can work together to develop favourable conditions to support them.

The first concerns the role of Statutory Guidance, although it is acknowledged that these will already have been submitted in response to the consultation. There was a feeling that the Guidance did not 'guide' in the same way that the first guidance did, and the two documents could be brought together to form a whole. Given the lack of funding, there was a strong sense that the Statutory Guidance needed to have more teeth so that play leads could use it to require colleagues across the authority to engage with the process. Funding cuts, staff reductions, greater workloads and competing priorities may all converge to push the Play Sufficiency Duty down the list of priorities, and it was felt that the Statutory Guidance was the appropriate instrument for ensuring cross-departmental and pan-authority participation; given this, there could be a stronger lead on requirements relating to partnerships and the political scrutiny process, including an impact assessment tool.

There were also concerns expressed about the need for some form of external accountability whilst recognising the tension between this and the concern that external audit systems can reduce complex issues to mere technical data, particularly if inspectors are not familiar with understandings of adults' role in supporting children's play.

The third area of concern was a perceived lack of coherence at national level concerning guidance on how existing funding streams can or cannot be used to support the Play Sufficiency Duty.

The final area is support for how learning from experiences to date can support further progress. There was some criticism for the section in the draft Guidance on good practice: whilst this is seen as a way of sharing, questions were raised about selection criteria, currency and the contingent nature of actions taken. The significant role of Play Wales was highlighted, in terms of working with both WLGA and Welsh Government to support the Duty, particularly in terms of developing toolkits and guidance for local authorities, working directly to support partnerships at local level, and also in training. It was suggested they could also play a role as a repository of the growing evidence of practice across local authorities. Given what has been said in *LSW* and in this report about the nature of knowledge, the importance of supporting the development of collective wisdom, and the importance of anecdotes, stories and shared experiences in this process, we would suggest that such a repository is a crucial complement to the technical focus on compliance and accountability. Greater attention needs to be paid to what is already happening, and to realise that children by and large can create moments of playing if conditions are favourable. This does not require much in

⁷ Croke, R (ed) (2013) *Rights Here Right Now: Are children's rights a reality in Wales*, Cardiff: Save the Children Fund.

terms of funding but it does necessitate key and stable drivers for change within national and local organisations and changes in practice to experiment with new possibilities that may have been previously not considered or closed off. As noted, these events matter as they contribute to developing collective wisdom but there seems little opportunity at the moment (with some notable exceptions) to capture and share these, not with the intention of replication but rather to continue to build a community of learning and practice.

(vii) Concluding remarks

Data from this research indicates the interim period between the first and second stage of the Duty has been an opportunity to strengthen partnership working, within and between authorities, with valued support from Play Wales. This has enhanced the formation and application of collective wisdom enabling sophisticated and creative responses to establishing spatial/relational conditions to support opportunities to play. The achievement of introducing the second stage of the Duty is a testimony to the commitment of national and local partners. The continuous development of collective wisdom will be vital in the next period in order to hold off *disenchanting* forces. This is not a predictable, uniform, linear and consensual process; collective wisdom, in this sense, implies developing approaches that are open, experimental and responsive to ever-changing conditions. This is challenging at the best of times. The existence of the Duty and its overall intention is itself a powerful supporting tool; to this can be added an effective balance between the vagueness of the concept of sufficiency on the one hand and on the other appropriate supportive but non-prescriptive guidance that facilitates innovation and can be used within local authorities to hold partners to account. In addition, attention needs to be paid to continued support for the growth of partnership working at national, regional and local level and the accompanying development of national and local intelligences.

The intensification of collective wisdom and extensive connections with a widening 'play' constituency are resilient and resourceful foundations for future success. As such, the gains made to date through multiple and interwoven networks of practice (from micro everyday relationships between adults and children to national policy formulation and implementation) must, as far as possible, be protected and strengthened. We would also suggest that as the second part of the Duty is commenced that careful consideration is given to the ways in which local authority actions and approaches are captured during the process to iteratively feed into the continuous formulation of collective wisdom. Taken together, these should help to develop a growing shared appreciation of the nature and value of children's playful relationships with time and space and how adults can support this.

1. Introduction

The Children and Families (Wales) Measure 2010 places a statutory duty on local authorities to assess and, as far as is reasonably practicable, to secure sufficient play opportunities for children. This moment in legislation is not isolated, but emerges from a combination of numerous actants,⁸ including a history, since the inception of the Welsh Assembly Government in 1999, of basing policies for children and young people on the UN Convention on the Rights of the Child and of partnership working with the Welsh Local Government Association (WLGA) and with a proactive and well-connected advocacy organisation, Play Wales. The Welsh Government recognises that the commencement of legislation to increase play opportunities for children is unique: Wales is the first country in the world to legislate in this way. The process and impact of the Play Sufficiency Duty is therefore of significance to stakeholders in Wales, the UK and internationally.

Sections 11(1), 11(2), 11(5) and 11(6) of the Duty were commenced in November 2012, and local authorities were required to carry out Play Sufficiency Assessments (PSAs) and submit these by 31 March 2013. A small scale research project was undertaken that explored how local authorities responded to the introduction of the duty to assess sufficiency of play opportunities for children, published as *Leopard Skin Wellies, a Top Hat and a Vacuum Cleaner Hose: An analysis of Wales' Play Sufficiency Assessment duty*⁹ (hereinafter referred to as 'LSW'). The title comes from an anecdote told by playworkers that encapsulates the many things that go to make up a culture of acceptance that means that a child dressed in these items is nothing remarkable and yet says everything about a play-friendly neighbourhood. The research drew on data from 20 local authority PSAs and associated documentation, interviews and notes from stakeholder meetings in three local authority case studies, notes from observing regional meetings to share experiences across local authorities, interviews with a Welsh Government officer and key officers from national partners (Play Wales and Welsh Local Government Association) and an online survey for key stakeholders involved in the PSA process.

In December 2013, following consultation with the WLGA, Play Wales and selected local authorities, the Welsh Government announced that it would be commencing the remaining sections, 11(3) and 11(4), in July 2014. A written Cabinet Statement was made to Assembly Members to this effect in February 2014. These sections require local authorities to secure, as far as is reasonably practicable, sufficient play opportunities for children in their area and to publish information about play opportunities. Draft Statutory Guidance on this second part of the Play Sufficiency Duty¹⁰ was published for consultation in March 2014.

This report is of a small-scale follow-up research project that sought to re-engage with stakeholders identified in the earlier one. The purpose of this research was to

⁸ 'Actant' is a term coined by Bruno Latour, as part of his Actor Network Theory, to describe how humans and non-humans (systems, objects, discourses, histories) mediate events. It highlights how events do not come about solely through independent actors but through the mediation of human and non-human actants.

⁹ Lester, S. and Russell, W. (2013) *Leopard Skin Wellies, a Top Hat and a Vacuum Cleaner Hose: An analysis of Wales' Play Sufficiency Assessment duty*, Cardiff: Play Wales.

¹⁰ Welsh Government (2014) *Wales: A Place Where Children Can Play. Draft Statutory Guidance to Local Authorities on securing sufficient play opportunities for children in their areas*, Cardiff: Welsh Government.

- look at what has happened over the past 12 months after submission of Play Sufficiency Assessments; and
- look at how selected local authorities have prepared themselves to respond to the forthcoming commencement of securing sufficiency of play opportunities.

Data for this report were gathered through documentation, attendance at and notes from regional meetings to consult on the draft Statutory Guidance for the second part of the Duty, and semi-structured interviews with national and local stakeholders, continuing the lines of investigation established in the initial research project.

LSW sought to explore the complexities and particularities of policy processes and narratives across the development of the Play Sufficiency Duty and local authority responses to the requirement to carry out PSAs. As the original report stated:

the relationship between social policy and play is not straight forward. Play is not only an activity that takes place in discrete spaces and at prescribed times; it is not something that can simply be 'provided' by adults, but is an act of co-creation that emerges opportunistically from an assemblage of interdependent and interrelated factors.¹¹

The Statutory Guidance¹² and accompanying Toolkit¹³ for carrying out Play Sufficiency Assessments provided local authorities with 111 criteria across nine Matters for them to address in developing their PSAs. Whilst this documentation sought to balance ambiguity with standardisation and prescription, the assumption is often that addressing the criteria produces factual knowledge as the basis for informed decision-making. Yet often policy decision are made by drawing on broader collective wisdom that emerges from sharing anecdotes and intuitions, histories, local contingent factors, relationships and so on. It is this *collective wisdom*, not always consensual, that we sought to promote in the first report and continue to do so in this one. Local authorities were required to work across departments and with the voluntary sector and children and young people themselves to develop this understanding. It was a challenging and intensive process that varied according to the starting point of each authority. As LSW states, 'each PSA is a reflection of the current state of understanding, attitudes, priorities, working relationships, and economic, social and political factors within the authority'.¹⁴

The Play Sufficiency Duty is not a revolution, but another piece in a transformation process that has taken place in Wales over the last two decades. The overall aim is to improve environmental conditions (and all that this entails including and beyond mere physical arrangements of space), to create 'a place where children can play'. Such a process is emergent in the sense that policy and practice are constantly being shaped and reconfigured as things happen. They are always responsive to local conditions, which in themselves are intimately connected and shaped across mutually influential scales of organisation and operation. As we discuss in this report, the economic and political conditions currently facing the Welsh Government and local authorities are challenging and there is the potential that this could lead to a state of disillusionment with the progress made to

¹¹ Lester and Russell (2013) *Op. cit.*, p. 6.

¹² Welsh Government (2012) *Creating a Play Friendly Wales: Statutory Guidance to Local Authorities on assessing for sufficient play opportunities for children in their areas*, Cardiff: Welsh Government.

¹³ Welsh Government and Play Wales (2012) *Play Sufficiency Assessment Toolkit*, Cardiff: Welsh Government.

¹⁴ Lester and Russell (2013) *Op. cit.*, p. 7.

date and with the further requirements once the second stage of the Play Sufficiency Duty is commenced. The intention here is to draw attention to counter forces, the ways in which local authorities have coped with the demands of implementing the Duty, and signpost ways in which this may be maintained in the face of political uncertainties and unprecedented public spending cuts.

Overall findings from this study suggest that generally speaking local authorities are developing a sense of 'response-ability', building their capacity to cope with uncertain times while retaining a clear sense of purpose. Such a claim may also be made about playing, not as a pre-planned activity but as fluid, discontinuous, and contingent with multiple forms of expression that may appear anywhere and everywhere. Playing may contribute to developing resilience, used here as an expression of children's resourcefulness in being able to find or reclaim time and space for playing to produce moments when life is more vibrant and pleasurable, with associated benefits in terms of being-well.

Given that play is not something that can be 'provided' - or even 'provided for' in any top-down prescriptive manner - the enactment of the Play Sufficiency Duty faces some challenges. Nevertheless, as the summary of the original *LSW* report notes, the introduction of the Welsh Government's Play Sufficiency Duty has required local authorities to pay closer attention to supportive environmental conditions in which children's playfulness might emerge. It is an invitation to rethink ideas about what might constitute a 'good environment' and the ways in which adults and children 'make efforts to spin webs of social justice and emancipation out of the *prevailing circumstances*' [our italics].¹⁵ Local authority responses to the PSA were appreciative of the 'prevailing circumstances', with each area developing action plans that recognised their current position and indicated areas where steps towards improvements may be taken. *LSW* noted the significance of this process; it also highlighted the dangers of trying to develop universal standards or blueprints while noting the importance of generating favourable conditions to sustain and enhance local authorities' ability to cultivate collective wisdom: a growing awareness of the complexity, interrelationships, practices, policies and so on that contribute in multiply entangled ways to produce spaces of inclusion or exclusion.

In *LSW*, the analysis of local authorities' approaches to developing PSAs and action plans was themed using a framework drawn from Ash Amin's account of the good city,¹⁶ particularly his four registers of repair and maintenance, relatedness, rights and re-enchantment. Such an approach enabled an analysis that could make connections across the nine diverse Matters of the Statutory Guidance and accompanying toolkit.¹⁷ Amin's registers are introduced again in the next section partly to give a flavour of the original research and also because the framework has value for attending to ways of developing 'collective wisdom', and this is further developed in relation to data collected in this short follow-up study.

Following this re-engagement with the thematic framework, each register is considered, although it should be noted that these do not exist as discrete elements but are cross-cutting and mutually connected. The report finishes with some concluding comments regarding developing favourable conditions to support local authorities in their endeavours to create a play friendly Wales.

¹⁵ Amin, A. (2006) *The Good City*, *Urban Studies*, 43(5/6), p. 1010.

¹⁶ Amin, A. (2006) *Op. cit.*, pp. 1009–1023.

¹⁷ Welsh Government (2012) *Op. cit.*, and Welsh Government and Play Wales (2012) *Op. cit.*

2. Framing for the report

In his discussion of what might constitute a good city, Amin suggests that a habit of solidarity - of common interest and collective civic engagement - needs to be nurtured and that

such a habit can play a vital role in nudging the urban public culture—expressed in the acts and attitudes of government, the media, opinion-makers, civic organisations, communities and citizens—towards outcomes that benefit the more rather than the few, without compromising the right to difference that contemporary urban life demands. The result is the city that learns to live with, perhaps even value, difference, publicise the commons, and crowd out the violence of an urbanism of exclusionary and privatised interest.¹⁸

We suggested, in *LSW*, that these ideas can be readily adapted to form a framework for considering Wales as a play-friendly country (the 'good country', perhaps), and the four registers can be useful in looking at how they might combine to produce public spaces that are open to children's playful presence, recognising that:

environments are not merely physical containers for action but are produced through a complex pattern of relationships, practices, habits, technologies, symbols and so on that collectively act to shape spatial routines; they are important for making spaces work but have exclusionary effects. Thus no-ball games signs, road arrangements, work patterns, media influences, institutional practices and so on, collectively influence the rhythms and patterns of children's spatial lives.¹⁹

The first register, repair and maintenance, looks at how space works to include or exclude different people in order to repair it to make it more equitable. This addresses many of the ideas in the Statutory Guidance for the assessments, particularly those relating to public, open and green spaces, designated play spaces and supervised play provision. In this report, this section includes the actions that have been taken over the past year by local authorities relating to space (particularly Matters C, D and F in the PSA action plans), the discussion around commencing the second part of the Duty on a cost-neutral basis and the injection of additional funding in the final quarter of the financial year. The second register, relatedness, refers to how difference can be accommodated within relationships, both across interest groups at policy and service delivery levels and in terms of adults acknowledging children's different relationships with and experiences of their environments. Rights, Amin's third register, refers to the right to participate in and shape neighbourhoods; in our adaptation, it is about respecting children's rights to participate in their own cultures of playing in the everyday lives as well as the more formal rights enshrined both in the UN Convention on the Rights of the Child (which the Welsh Government has used as the basis for its policies relating to children and young people), particularly article 31 and General Comment 17 on article 31,²⁰ and the Rights of Children and Young Persons (Wales) Measure 2011. It is also about children's right to participate in decisions affecting their lives and the rights of all children, including minority groups, to find time, space and permission to play. The final register, re-enchantment, is about holding up to critical consideration taken-for-granted and habitual practices, policies, priorities, symbols, assumptions and so on in order to reveal how they might support or constrain environmental conditions for playing. In many ways, children's play itself constitutes a re-enchantment of space for

¹⁸ Amin (2006) *Op. cit.*, p1012

¹⁹ Lester and Russell, (2013) *Op. cit.*, p. 7.

²⁰ UNCRC (2013) *General comment No. 17 (2013): The right of the child to rest, leisure, play, recreational activities, cultural life and the arts (Article 31)*, Geneva: UNCRC.

the time of playing, found in and created from the cracks left behind in adult orderings of space and time for largely economic purposes.

An important opening point is the process of re-enchantment works across multiple levels of organisation but finds ultimate expression in children's everyday acts and encounters, as evidenced through the anecdote about the child with the leopard skin wellies. Analysing the playworker interview notes reveals that this moment has a tracing that connects with innumerable environmental/relational features; the presence of the playworkers, the development of the adventure playground and its responsiveness to local conditions, the relationship between children, playworkers and adults on the estate, an emerging culture in which a resident can put an old trampoline onto an open space for children to play with, the provision of play priority signs by the community, and so on, produce the conditions that contribute to the child playing in that place, at that particular time. This can be traced even further away from the encounter to consider how the training experiences and subsequent professional development of the playworkers, the availability of local open space, the community engagement in supporting play and wanting to make the estate more liveable for adults and children, the relationships that have been developed with the Police Community Support Officers, and so on, all play a part in shaping the child walking around in a top hat carrying an old vacuum cleaner tube. Every such encounter and event of a child with their environment is far more than the immediate surroundings.²¹

3. Repair and Maintenance

3.1 Introduction

The Play Sufficiency Assessments and accompanying action plans illustrated the intentions to repair and maintain spaces (dedicated play spaces, supervised play provision and the general environment) in order to make them more open for playing. One assumption here concerns the exclusionary effect of adult organisation of time and space that constrains children's ability to play, perhaps seen most starkly in the drive for progress and development that privileges economic activity over social, and particularly the social lives of those who are not seen to contribute to public life and the economy.²² This was illustrated in one PSA, cited in *LSW*, which stated that they felt the idea of making residential streets more playable was inappropriate, adding 'The Highway Authority does not condone the use of the adopted Highway as a play arena as its primary legislated function is the safe and efficient movement of goods, services and people'.²³ Yet other research carried out for one PSA also noted that children 'used edges of designated space, valued left-over space, and some actually ranged over a wide area – so the general surplus/deficit approach doesn't work in taking this into account and the current methods for considering open space assessments needs to change'.²⁴

This suggests the need for a broader understanding of space, since

children's experiences, while enacted in local environments, are shaped by forces operating at multiple scales of analysis. It recognises that 'space' - or the environment - is not simply a

²¹ Lester and Russell (2013) *Op. cit.*, p. 72.

²² Lester, S. and Russell, W. (2010) *Children's right to play: An examination of the importance of play in the lives of children worldwide*, The Hague: Bernard van Leer Foundation.

²³ Cited in Lester and Russell (2013) *op. cit.*, p. 53

²⁴ Lester and Russell (2013) *op. cit.*, p. 45.

physical landscape, but is constantly produced and created through encounters and relationships between people, materials, discursive practices, policies, attitudes and so on in highly complex and contingent ways.²⁵

The action plans included many spatial interventions aimed at opening space up for playing; these are important, but on their own may not be sufficient to effect change given the range of actants described above. Although the initial research identified a variety of responses to this element of the PSA, from largely technical tick-box approaches to more nuanced appreciations of the complexities of children's experiences of their local neighbourhoods, we concluded that the PSA process itself could act as an 'attractor', as something that had the potential to open up critical scrutiny of existing spatial arrangements and practices in a continuous process of meaning-making in order to enact processes of repair that might include technical interventions and also developing greater collective wisdom about co-creating conditions that support play.

3.2 Low cost/no cost approaches

The action plans for 2013/2014 were drawn up on a 'low cost/no cost' basis, as it was acknowledged that there was no additional funding available at that stage. The national organisations and local authorities engaged with this, noting that repair of environments to support children's play was often a question of doing things differently and perhaps did not always require injections of cash. At the same time, there were feelings that some funding would also be necessary for the initiatives to be sustained.

Twelve months on, selected local authority play leads were asked what they felt they had achieved over the year. One stated, 'I don't think I can over-emphasise how much the Play Sufficiency has affected our work'. This local authority had worked closely with children to look at their satisfaction with being able to find time, space and permission to play, and had continued this work:

We have done work with communities identified in the PSA that rated very highly in terms of satisfaction and ones that rated low and look at what the differences are – and looking at spaces and attitudes within them but particularly looking at the spaces stuff. In both high satisfaction areas the number of spaces is vast compared to where children are rating lowest satisfaction – (spaces = all areas where children may play and not simply designated areas). In B the kids drew play maps of incredible details and we went to another community and they couldn't draw it at all. You walk around B and you see those spaces they have talked about ... 15 places maybe that they list as places that they go and you see the same, although it looks different in terms of landscape, in PM where every little set of houses has a mound outside it – so there must be 20 spaces easily and you see kids popping out all over. It has really built on what we found from PSA – it will give planning some real examples to talk about.

Such an account begins to reveal how children can find time and space for playing in their neighbourhoods and that they experience these spaces differently from adults, but that this varies across different places. A key message in terms of planning is the importance of pockets of indeterminate space that may have some landscaping but is not over-prescribed. A second message is the importance of appreciating children's actual use of space rather than relying on potential use assumed in the planning process; however, this raises some ethical issues regarding children's right

²⁵ Lester and Russell (2013) *op. cit.*, p. 34.

to be separable from adults,²⁶ suggesting adults should tread carefully in the desire to 'know' about children's play.

Generally speaking, interviewees and delegates at the regional events were enthusiastic about the difference that the PSA process and the action plan had made, particularly in terms of developing a broader, cross-departmental awareness of children's play and how responsibility for considering this might extend beyond those with 'play' in their job titles.

I would probably say that most of the significant achievements are the ones that we made when there wasn't any funding ... over the last year or so we had moved from people seeing as play as something that was to do with that guy ... [and] his team to the recognition that everybody is going to be contributing. And certainly over the last year we have had far more engagement with planning, housing, environment, sport and other areas – because of the Duty and the various points within it we were then able to say there is a duty on the local authority (LA Play Lead interview).

Some had managed to find funding to maintain services, albeit short term:

We're really lucky in terms of the successes – our open access provision that runs from the Integrated Children's Centres, we've had joint funding now from Communities First and Families First, so that provision can continue up until September of this year and then hopefully we can put a proposal in to the out of school childcare grant for funding from September to Christmas time so that provision can continue for families. So that's been really positive (LA Play Lead, interview).

Yet there were also tensions regarding funding, not only because of the lack of identified budgets to support implementation of actions that did require funding, but also because the Play Sufficiency Duty was being brought in at a time of unprecedented public spending cuts in local authorities. One local authority interviewee commented, when asked about the challenges faced over the past year:

I think it's the lack of funding surrounding the action plan initially, from April to Christmas time ... a lot of things, we'd got so far with them, playgrounds and things like that, we've managed to do a lot of the groundwork, but then it kind of stops when money needs to be invested in it. So, you get to a certain point and then something is shelved ... You can do a lot of things but then money, more often than not, does come into it at some point (LA Play Lead, interview).

Another spoke of the difficulties in maintaining current play services in the face of increasing austerity measures and public spending cuts. Although supervised provision in that authority had avoided closure this year, this was felt to be a 'stay of execution' since further cuts are planned for 2014/15. Competing interests will become more keenly felt as budgets become even more constrained. Although the Play Sufficiency Duty places a statutory duty on local authorities to assess and secure sufficient play opportunities, the interviewee felt this was not the same as seeing play services themselves as statutory services and they were therefore subject to budget savings.

Given the lack of additional funding, the Welsh Government was cautious about commencing the second part of the duty. Opinions were sought from local authorities and from Play Wales and

²⁶ Lee, N. (2006) *Childhood and Human Value: Development, separation and separability*, Maidenhead: Open University Press.

WLGA. On the basis of these discussions, it was agreed to commence the second part of the duty on a cost neutral basis, as one national interviewee commented:

It wouldn't have been appropriate from all sorts of views – for the actual outcomes for children but also the legislative process – to have commenced part of it and then have a delay in commencing the second part.

In interviews and at the regional consultation events, there was enthusiasm for commencing the second part. At the same time, although there have been creative and innovative cost-neutral changes, some local authority representatives expressed the feeling that there has to be some funding attached in order to maintain momentum and to be taken seriously by other departments across the authority. One local authority interviewee suggested that one contributing factor to the success of the Childcare Sufficiency Group was that it had funds to distribute, a shared and time task that also brought status.

3.3 Additional funding for increasing play opportunities

In January 2014, the Welsh Government wrote to local authorities offering additional funding for 'increasing play opportunities for children'. A total of £1.25m was allocated across all 22 Welsh local authorities. The purpose of the funding was

to enable you to increase or enhance play opportunities for children in your area as identified in your Local Authority's Play Sufficiency Assessment and Play Action Plan 2013. This should align with the Welsh Government Play Policy agenda as set out in Creating a Play Friendly Wales; the Statutory Guidance to Local Authorities on assessing for sufficient play opportunities for children in their areas. The programme for the expenditure of this funding should be based on your Play Action Plan or on further identified actions to promote play within the required time frame.²⁷

The required time frame was within the financial year; claims had to be submitted by 14 March 2014. The feedback at the regional consultation events, where delegates shared how they had spent this funding, and through interviews, was that the additional funding was welcomed, but some felt the timescales put restrictions on how priorities within the PSA Action Plans could be met.

That money has definitely allowed us to do things that wouldn't have happened ... But the time scales were completely ridiculous and created a huge amount of stress and work ... we could have wasted the money quite easily by buying equipment. We had 15/16 different elements and just administering that money was a huge amount of work. I still think if we had more time, if we had that money every year we would use it more effectively. We did some of the things we wanted but we found ourselves trying to identify something the money could be spent on in that time scale. We could have made better use with more time (LA Play Lead interview).

It's just the problem is not being able to think long term. The funding in January was fantastic ..., and although at the time it was, how are we going to spend all of this by the end of March, it's surprising actually what we managed to achieve through that funding. But it was really frustrating because if we'd have just had that in April of this year, we would have been able to do much more long term things over the whole year rather than a few months (LA Play Lead interview).

²⁷ Welsh Government Grant Offer Letter CYP/PSAP/ 2013-14 'Award of Funding in relation to Increasing Play Opportunities for Children 2013-14' sent to CEOs 17 January 2014.

In addition, one interviewee acknowledged the broader financial context and spoke of initial concerns regarding local authority responses to the additional money:

we had the announcement in November about how dire the local authority budgets were going to be, and then suddenly, out of the blue, Welsh Government, in one area alone, finds over £1m funding ... everyone had made these major cuts and then suddenly oh, here you are, here's a million pounds, you can have it ... [People] do understand [underspend], but it sounds a lot ..., you can imagine colleagues in local authorities making difficult decisions about redundancies and everything else and suddenly the windfall of this money coming in at a time when they may be laying somebody off.

However, as a Play Wales officer noted in interview, while the timing could have been better, the fact that all local authorities had developed action plans as part of the PSA did place them in a favourable position to allocate the underspend to existing priorities. Certainly, comments from a Welsh Government official acknowledged that the action plans offered considerable scope for allocating the additional funds:

The Increasing Play Opportunities funding was used by local authorities according to the grant criteria and for a variety of locally identified priorities for play. These were actions that had been set out in the Play Action Plans 2013 – 14 and also others identified during the year. Use of the funding included the purchase of timber framed play equipment, loose parts, developing equal access to play spaces, publicity, conferences, events, and training.

This is supported by one local authority interviewee who noted that the additional funding 'did make us revisit all the areas of the play sufficiency assessment because a requirement of that was funding to drive those things that we'd identified in the assessment'. Looking at the range of proposals across the local authorities, there is evidence of allocating the additional spend in diverse ways, most of which are in line with the PSA action plans where timing permitted. One example that illustrates how actions cut across the interrelated themes of repair, relatedness, rights and re-enchantment can be found in an authority which used a portion of the funding through a 'Playful Schools' start up grant to incentivise schools to participate in developing more playful approaches to playtime. Other authorities highlighted how additional funding had opened up possibilities for engaging with new partners in particular schools; noting a range of actions that included opportunities for training playground staff, introducing loose parts and providing storage facilities.

Proposals were far ranging across most of the Matters, with many plans crossing several Matters (for example space, diverse needs, access and so on). In terms of spatial interventions to improve spaces for playing across Matters C, D and F considered here (space available for children to play, supervised provision, access to spaces for playing), proposals included playground improvements (including natural features and accessibility for disabled children and young people), purchase of peripatetic equipment and storage (including play pods), resources for particular groups (including Welsh speaking provision and provision for disabled children and young people), signage (including smoke-free playground signs and play priority signs), improved road safety and access to play areas and cycle routes. In addition, proposals included plans for events such as play days, street play events, family activity and fun days, supporting disabled children and young people to access events and provision, support for the sustainability of existing supervised provision, targeted activity and play sessions. Given that the funding requirements were time-restricted, it was not possible to use the allocation for longer term investment such as playworker posts beyond some short-term

supervised sessions and playwork training. As is shown in Section 4, playworkers have a fundamental role to play in the repair and maintenance of spaces that can support children's play.

The format of the proposal forms to be submitted required local authorities to list objectives and targets in one column and outcomes in another, stating 'Please note we require each objective/target to be quantitative (i.e. how many play opportunities will be developed or supported etc. Where possible, please also indicate how many children/families will benefit)'. Local authorities approached the form filling in different ways: some gave quantitative outputs in the outcomes column; others gave outcomes expected from the activities by matching them to aspects of the action plan. Some examples are given below:

More families undertaking play activities together developing stronger, healthier families.

To meet the play needs of Welsh speaking children and young people and promote the Welsh language.

Children will display a greater range of play behaviours.

Adding a new piece of play equipment within the parks ... will enhance children / young people's play and allow them to further develop their risk benefit through play.

80% of users record an increase feeling of well-being and positivity to the play area.

Technical spatial interventions aimed at repairing space in order to make it more playable inevitably need to be 'planned' in some way, yet given what has been said here and in *LSW* about the complexities of the co-production of space, on their own they cannot guarantee to bring about the desired outcomes. The design of the form encourages causal claims that cannot be directly attributable to the intervention alone. It is possible that the form may tell only a part of the full story of interventions aimed at creating conditions for playing; however, the pervasiveness of such governmental technologies tends to occlude the disparate range of actors and actants (technical and spatial interventions, spatial design, equipment and resources, histories, relationships, other spatial arrangements and practices, and so on) that come together to create moments when children can take time and space to play.

Although the format of the form does not particularly encourage acknowledgement of the ambiguity and lack of linear cause-effect relationships of spatial interventions, this appreciation is evident in some of the submissions. For example, one local authority wanted to carry out road safety measures including the installation of an interactive speed warning sign in an area close to a school, monitoring speed changes through a speed survey. However, this was not an isolated measure: collaborative work in a small rural village with Police, Road Safety Unit and Highways has revealed 'near misses' as a result of children playing on the roads, so:

The Road Safety Officer attended the school to discuss road awareness with the children. Play Officer has been working with the County Councillor and the PCSO Officer for the area to create a committee group, which has been a successful task and Property department have allowed the Community Council to have lease on a land behind the local school in order to create a park within the community.

The form also notes that play observations will be carried out to see how the space is actually used by children. This small snapshot shows how the Play Sufficiency process has brought together a range of actors and actants to enable the authority to seek funding for specific aspects of work that has been ongoing for some time, linked to the action plan in the PSA.

3.4 Summary

Our analysis shows that local authorities have been able to effect aspects of their action plans aimed at making spaces more open to playing for children. Whilst there is general enthusiasm for the commencement of the second part of the duty, there is also concern that funding constraints may both impede progress on specifics in action plans and also, more worryingly, lead to reductions in posts of key people with the experience, expertise and connections to drive things forward. While the additional funding was valued across the local authorities, its impact on developing an infra-structure to respond to the commencement of the second stage of the Duty may be patchy and uneven. Where the PSA process had adopted a 'principled' approach, as noted in one of the original case studies in *LSW*, there was a greater capacity to think strategically. For one case study, the press release announcing the funding was ambiguous and led to some elected members interpreting this as an opportunity to upgrade local play areas. In response, the play lead referred them to the priorities established in the action plan and the focus on developing systems for securing sufficiency, making the point that dividing the money up between communities would not make a significant difference. Instead, with the support of the play partnership, the money was allocated in further developing collective wisdom, something that is explored in more detail in later sections.

4. Relatedness

4.1 Context

As noted in *LSW*, the issue of relatedness addresses the ways in which adults acknowledge that children are other than adults and may make different demands on time and space. In the context of the Play Sufficiency Duty, 'relatedness' refutes the idea that humans are independent, rational and autonomous agents by recognising that life goes on in relationships. Children and adults are not separate entities. Given this, it is suggested that all Matters addressed in the PSA are relational: children's and adults' lives shape and are shaped by intra-actions composed of diverse actors and actants (materials, technology, policy pronouncements, tool kits and so on). The challenge presented by the Play Sufficiency Duty is to develop relationships that counter forms of marginalisation and disconnection in order to create and promote spaces in which different needs can co-exist rather than privilege the needs of one group (adults) over another (children).

While the idea of relatedness is an overarching theme across all areas of the Play Sufficiency Duty, *LSW* paid more specific attention to Matters G, H and the second component of Matter F – namely the relationships between local authority departments, workforce development, the importance of advocacy and changing attitudes and community engagement. While looking at how this has developed over the past 12 months, this section also connects the theme of relatedness more explicitly with the notion of 'cultivating collective wisdom', a theme introduced in *LSW* to represent the conditions under which local authorities might continue to build local understanding of the complex factors that combine to produce favourable conditions for playing.

The process of developing collective wisdom relies on mutual sense or meaning-making, understood in this context as the continuous and open process of constructing and deepening insight into the ways in which things come together to co-create moments of playing. Such meanings are available for making some judgment about the ways in which sufficiency of play opportunities is being assessed and secured. However, this judgment is not an objective truth or value; neither is it a representation of what actually happens in the everyday practices of adults and children; there are many different 'knowledges' at play, each of which is partial, contextual and tentative. Collective wisdom is an extensive formation, drawing on diverse perspectives (across departments, voluntary sector, local communities, schools, children and so on) without reducing one to another. But while this is always incomplete there is an underpinning ethical/political position that is founded on principles and enactment of equity and justice: children, as citizens, should have equitable access to time/space for playing.

4.2 Intensifying partnership working

The original *LSW* report highlighted how, in a number of cases, effective partnership working with key stakeholders, ongoing dialogue, and paying careful and sensitive attention to children's active participation, as children, in their local environments contributed to developing sophisticated Play Sufficiency Assessments and associated action plans. Undoubtedly, one of the key themes to emerge from this follow-up study is whether the momentum of networking and alliance building established through the Play Sufficiency Assessment had been continued and strengthened. Most of the local authority interviews highlighted this as one of the most significant achievements over the past 12 months; the following two extracts are typical of responses:

I think a lot of the partnerships that didn't exist previously have developed. Setting up that group has helped. And then those kinds of partnerships that were forged then as a result of conducting the PSA have carried on. Not having any money attached to it at the time other ways of working, you know, specifically with road safety and youth clubs have developed, just through talking really and getting to grips with what other people do and how they work in other departments. So it's been really useful.

...certainly over the last year we have had far more engagement with planning, housing, environment, sport and other areas – because of the Duty and the various points within it we were then able to say there is a duty on the local authority, this bit comes under your area – are you aware of it and this is something that we can perhaps work together on – is it something that you currently do? And what that does is put play on the agenda of a lot more sections and directorates, which is obviously fantastic for us.

The second interviewee continued by noting that the significant feature since completing the PSA had been the participation of different areas and sections who understood how their engagement with supporting conditions for play could actually support their own aims and objectives. Yet this also implied a form of disconnection, in that cross-departmental support may only be forthcoming insofar as it was seen to assist with that department's own priorities, and if other issues came to the fore, or people changed (a recurrent theme because of restructures and redundancies), then departments could easily disengage, as recounted in this interview:

People want to do it, they can see the benefit of it ... for example, I had a really good productive meeting with the road safety department. We came up with a lot of ideas of how we could work in partnership and looking at safe routes to play provision and how we can work with children,

communities and young people, making sure that they're accessing their provision safely ... So really good discussions, and quite good points in our action plan of how we could move forward, and there was hardly any cost attached to it. But then 2 weeks later I saw N at another meeting and she said they'd had a new manager and a restructure and the priorities have changed, and she didn't know how much of that work with the cuts she'd had to her budget that she could do for play sufficiency. So the goodwill is there but then, you know departments have their own priorities and issues and difficulties just doing their day-to-day bread and butter work (LA Play Lead interview).

The issue of partnership working has also been reported by a WLGA officer who noted, with particular reference to the North Wales consultation meeting, that play leads were 'now in meetings with colleagues who they never ever thought they'd get round the table with [planners, regeneration teams and so on] before, the door was never opened to them and now the door's open'. A presentation by this officer at a consultation event provided an illuminating example of a local authority where there was a roomful of people including the Leader of the Council and senior cabinet members, with Community and Town Councils, and voluntary sector representatives all engaged in talking about play.

This increasing momentum is productive in that it reinvigorates collective working across what may have previously been impermeable department boundaries. For example, one local authority interviewee noted the new relationship with planners had led to a complete re-writing of the authority's residential design guide. It also extended beyond the local authority: as a Play Wales officer comments, they had received an increase in requests to support local planners and play development officers/play sufficiency leads with open space assessments, Local Development Plans (LDPs) and supplementary planning guidance to ensure play was considered. This adds to collective wisdom at multiple scales or organisation, enabling Play Wales also to be part of the co-production of local knowledge. As such Play Wales becomes a key contributor to and repository of collective wisdom.

The continued momentum in partnership working is also generative of new knowledge, as another play lead commented on a recent play partnership meeting in which there was a lengthy in-depth discussion between ten people from different services around the things that might impact on children's ability to play:

... the development of a common language and understanding I think will make a real difference and you can see the start of those discussions leading to the start of other bits of work and I think we will end up with a framework for professional development in [the authority] that is about play and playwork but is accessed by a much broader range of people.

It is noticeable that this authority allocated a significant proportion of the additional funding to continue detailed research into the value children attribute to their local environments to better inform their response to the Duty. Findings from this research fed back into the partnership to further enhance understandings of children's everyday relationship with their local environments and positioned the partnership to be more effective in implementing actions that were appropriate and sensitive to local conditions. Another local authority had invested in resources (monitoring/recording devices) to support play projects to evidence the value of their service through case studies and digital story-telling. It is also worth noting another specific example given in a local authority spending proposal in which there was the stated intention to use playworkers to

undertake research and disseminate findings of areas with high and low satisfaction with play to improve play opportunities for all children. This was to be carried out in consultation with children and also involved a mapping exercise to assess play opportunities in ten rural areas. What may be happening in these contexts is that playworkers are beginning to add to the collective wisdom of their respective partnerships, bringing different forms of knowledge and expertise about play provision and the wider local community.

This theme was further developed in an interview with a play lead who strongly expressed the positive contribution that playworkers make to the Play Sufficiency Duty within the authority, with particular reference to what it brought to the formation of collective wisdom. As part of the spending allocation, the partnership had commissioned research to investigate the contribution that a culture and history of playwork had made to two local communities. Early findings suggest that in focus groups with professionals and local adults and children there was a clear understanding of where playwork sat within the local community and what playworkers did, with local examples of 'playworkers knocking on doors to see if so-and-so is coming out' and so on. Concerns were expressed that there was a duty to secure sufficient play opportunities, but that did not necessarily mean securing playwork, and while there was good evidence of the vital role that it can make in communities, 'we have got to make sure that people make that link between playwork and securing play opportunities'. The point was made that playwork was part of the repair and maintenance routines within local communities, and even in an area where children have a high degree of satisfaction with their environments there were likely to be changes; playwork local knowledge could help ensure that such changes did not have a negative impact on sufficiency of play opportunities.

Some authorities had also taken advantage of the additional funding to widen and increase shared understanding. In one example, an authority purchased and distributed a number of community toolkits²⁸ to enable Community Councils to be 'better informed of how to develop and manage new and existing play spaces'. The same authority also supplied primary schools with copies of the schools toolkit²⁹ to assist with making playgrounds accessible for the local community outside of teaching hours. A number of other authorities had invested in and disseminated these resources to relevant sectors. These materials have been produced by Play Wales in response to a number of gaps identified in the PSA process and as a way of keeping the momentum going (this is revisited in Section 6).

Further resources, including purchase and distribution of 'Managing Risk in Play Provision Implementation Guide'³⁰ and obtaining a licence for community screenings of 'Project Wild Thing'³¹ would suggest that the authorities are seeking to broaden and deepen the capacity to support play opportunities. A considerable number of authorities had used some of the additional funding to develop the workforce, offering playwork training and more general training opportunities. For example, one authority developed Forest School training for Housing Associations, another provided

²⁸ Play Wales (2013) *Community Toolkit: Developing and managing play spaces*, Cardiff: Play Wales.

²⁹ Play Wales (2013) *The Toolkit: Use of school grounds for playing out of teaching hours*, Cardiff: Play Wales.

³⁰ Ball, D., Gill, T. and Spiegel, B. (2013) *Managing Risk in Play Provision Implementation Guide*, 2nd edition, London: National Children's Bureau.

³¹ *Project Wild Thing* (2013) [film] Directed by David Bond, London: Green Lion Films.

a range of continuing professional development and play awareness events for voluntary groups, child care providers, lunchtime supervisors, parents and carers, etc.

What may be happening, from the above examples, is an intensive/extensive process, that is, emergent partnerships are intensifying their 'collective wisdom' through ongoing dialogue, information gathering and sharing, and sense-making. This deepens understanding of the complex processes and relational entanglements that contribute to supporting a sufficiency of play opportunities. At the same time, becoming more intensive leads to the necessity of establishing greater connections with other key stakeholders and so it becomes more extensive in its reach. As a Play Wales officer commented, 'it is about making sure that people make a difference on the ground'. There appears to have been a widening of connections that extends beyond the original PSA groups to consider new ways of working and also the combined significance of advocacy and attitude change.

4.3 Extensive relationships

A number of local authorities had taken the opportunity (often with the help of additional funding received from the Welsh Government at the start of the year) to build and extend supportive networks through facilitating conferences and seminars. One authority reported at a consultation event that they had held a conference to facilitate the development of a 'play pledge'. Other examples from across spending plans included delivering 'play awareness' sessions to promote the importance of play and consider cost-effective ways to improve play opportunities, and facilitating 'Management of risk in play provision' seminars. Alongside this, one authority held a play conference to share good practice with play area providers. The same authority also undertook a visit to another authority, renowned for its approach to supporting children's play and playwork. One of the interviewees, working with play officers from five other authorities in the region, developed a 'Street Life conference', described as:

a really interesting piece of work to do together and got a really good mix – no tangible actions have come out of it but real mix of people to come and talk about play – so that is what can happen when you have people in post – but during that period we were talking to people who would no longer be in post come April – so maybe two out of those six local authorities might not have someone with that experience and how does that work in continuing to try to work together?

This final point is of considerable importance and is raised in other sections of this report.

In preparing for the next stage, some local authorities are paying increasing attention to ways in which the aims and intentions of the Play Sufficiency Duty can extend to the general public. One authority, reporting on progress at a regional consultation event, noted that the additional funding had been used to develop far-reaching marketing materials that promote 'Come and Play'/'Dewch I Chwarae!' which helped families recognise the service. The authority, working with partners, was also using Facebook and Twitter to promote play and play opportunities. A number of funding proposals also included elements for developing 'play awareness' campaigns through an increased online presence, information resources, contributing to Family Information Services and attending community and multi-agency meetings. The need to generate a higher public profile for the Play Sufficiency Duty was also echoed in interviews with Play Wales officers who noted the importance of widening appreciation of the existence of the Duty 'so more parents and children know that local

authorities should be doing something'. In developing this, a Play Wales officer noted that promotion of the Duty should use the language of 'opportunities for playing' to move beyond the dominant assumption that the Duty is mostly about direct provision:

So I would like to see us working together with the sector to develop information for parents, and the wider community promoting the importance of play and playing as well as promoting what the local authority can do and is doing. That is really what I would like to see us influencing significantly over the next year once that Duty is commenced. Working together to get some coherent messages out so that parents and children are getting important messages about sufficiency and playing and it is not just to tick on where their local skate park is.

One of the case study authorities had developed a short video, available on YouTube, which tells the story of the Play Sufficiency Duty to date in a more accessible, presentation style, partially to give feedback to all the children who participated in the consultation process for the PSA but primarily 'to help people understand what we got from the PSA, because it has the potential to create impact to support our work ... if we can find a way to get people to do that'. And yet another authority had initiated a bi-annual Play Friendly Community Awards to promote the idea of the contribution an entire community can make to provision of play opportunities.

The intensive/extensive relationship was exemplified in one case study report in which the play development team worked with child care settings, supported by Family Information Services mentoring funding. This innovative project (in the sense that there was no previous formal working relationship between the Play Development team and childcare settings) was titled 'green time' based on a quote from a child who, in response to a consultation, said 'you can't have enough green time' in reference to the traffic lights system used in PSA. The play development team worked with staff from five childcare settings to explore their 'perceptions, how they feel about their roles, how they feel about where they work and frustrations they may have, what they think their role is'. This was supported by input on contemporary play theory and the key findings from undertaking the PSA. Practitioners were introduced to the Manchester Circles model³² (devised as an approach to considering quality in play provision) to identify what might be constraints and opportunities for free time/space. The workshop sessions supported settings in producing a collective play policy and action plan drawing on ideas developed in *LSW* (namely Amin's four registers) and the framework and approach will be further developed to run a similar programme with schools in September 2014.

As with other examples identified to date (again most notably in work with schools), this suggests that more connections are being made in response to the PSA and action plans, and while some of the initiatives have been supported by additional funding, they have the potential to be a significant approach in a 'cost-neutral' future.

4.4 The collective wisdom of children

As noted in *LSW*, one of the key contributory factors to collective sense making is an understanding of the multiple ways in which children manage to get on with their lives. Children have rich situated knowledge of their everyday experiences but this is not readily accessible; yet such knowledge is central to the effective implementation of the Play Sufficiency Duty. One of the key favourable

³² Lester, S. and Russell, W. (2002) *Play for Real*, Manchester City Council (unpublished).

conditions identified in *LSW* was the importance of developing more sophisticated approaches that appreciate the ways in which children negotiate and exploit local conditions to create time/space for playing. The local authority spending proposals in general seemed to pay little attention to this, although a limited number of authorities did introduce examples at the regional consultation events. For example, one authority had initiated a 'play heroes' programme through work in after-school clubs and during lunchtime sessions with children using disposable cameras in which Year 5 pupils had become 'the eyes and ears in their community', developing local knowledge, wish lists, identifying issues. Having initiated this process, consideration was being given to how this knowledge could help inform service decisions, with the suggestion of establishing a virtual 'Children's Play Board'. Other diverse examples of increasing awareness around children's everyday ways of 'participating' as children in their local environments, largely gleaned from funding proposals, included:

- allocating a proportion of the additional funding to develop a film to promote a 'week in the life of gypsy and traveller children', and to support a group of children and young people from the gypsy, traveller and Roma community to attend training on Article 12;
- facilitating a workshop 'My Voice, My Choice' to raise awareness of the importance of using participation methods with children of all ages as part of their play;
- a play officer had worked with Sustrans Big Streets survey where children assess communities and barriers to them - children had developed manifestos and additional money had been used to support local children to present these and carry out actions to make their communities easier to travel through;
- funding artists to work with up to 30 children and young people in creating street exhibitions aimed at raising the profile of children's right to play.

As previously introduced, one case study authority had developed further the innovative consultation/ participation approaches used in the PSA to continue to build understanding of how children can take advantage of environmental conditions to create moments of play. The ongoing research with children in specific communities revealed children's level of satisfaction with their environments may be correlated with the variety and availability of local spaces (not simply designated play areas but all the indeterminate spaces that are found in the local environment), noting that 'in both high satisfaction areas the number of spaces is vast compared to where children are rating lowest satisfaction'. Children from these areas have their own 'toponymy', taking ownership of a place by imaginatively, but often mundanely, naming it with examples such as 'telly-tubby hill' and the 'tunnel'. The continued development of understanding and associated sensitivity towards children's place use had enabled a greater shared collective wisdom with planners and this had some exciting possibilities for future work (developed further in Section 6).

4.5 Issues of sustainability

Many of the emerging partnerships rely on existing or newly formed relationships between the play lead and key figures from other departments. As noted in *LSW*, these informal working relationships are essential in the formation of collective wisdom, but on their own they are vulnerable both in terms of sustainability and accountability (see Section 7). This situation was acknowledged in an interview with a Play Wales officer, who noted that the series of 'State of Play' reports since 2000 highlighted provision for playing was very much dependent on the goodwill of different people within local authorities and there was a need to develop a more coherent structure with more

guidance from the Welsh Government needed on this. Another Play Wales officer concurred, noting that some of the spending proposals had clearly paid attention to developing the infra-structure to be responsive to the commencement of the second stage of the Duty, but this was not a universal approach, and 'that rather begs the question why others haven't?' Extending this, the officer commented:

there are a variety of reasons but I guess one analysis may be that those authorities that have managed to do that have done so because of the creativity of the lead officials and notwithstanding the fact that very few play leads in local authorities are employed and paid at a level appropriate to the strategic expectations of their role.

The central role of the play lead, identified as pivotal in the PSA process, had been of equal value over the past 12 months and was likely to continue to be so after the commencement of the second stage of the Duty. One case study play lead noted that while the stakeholder group brought together to undertake the PSA still met on a regular basis, and indeed met more frequently after the announcement of additional funding, there were still important links that needed to be made. The interviewee cited a specific case with the planning department, who to date had not engaged with the Play Sufficiency process, and arranging a specific meeting with them to progress things. The play lead noted that they might not see the direct relevance to their role, 'everyone's going through restructures and all of this, and cuts and things, so I think it's not seen as a priority at the moment, but hopefully now, if we meet up next week, we might get somewhere, looking at how we could work together'. It may be suggested that without this function, progress would not be made. This point is reinforced by the following extract from a play lead who stressed the significance of identifying and maintaining effective relationship by:

making sure you have the right person there and what comes with having the right person is to keep in contact with them and reinforce the message of play. If there isn't somebody there that is reinforcing the message then they are going to get the message of budgetary constraints or something else or another pressure which is going to mean the significance of play in planning and development does get taken out, or schools have to put the funding intended for their outdoor play space for something else.

Another case study play lead noted the need to develop a more formal acknowledgement of the work of the play partnership within local authority structures to ensure that it had appropriate representation and legitimacy. While the perception may be that the partnership group worked well and had formed good working relationships, the emphasis was still very much on the play lead to support and maintain these:

I have been saying there has to be some commitment from above to make sure appropriate representation in case people leave – people are leaving left, right and centre ... some people will just disappear so the idea that it is all based on one person's ability to maintain relationships, which is a big part of the Sufficiency Duty – well what happens if I leave? Suddenly there isn't that network. But because of the extreme pressures on finances and therefore people's workloads, people are very concerned about adding more stuff to individual workloads.

This contrasts with another authority which has a two-tier formal structure for partnership working: the first of these consists of Principal Officers, chaired by heads-of-service. This Board acts as strategic support to the second level Play Network, constituted from local authority representatives

and voluntary sector organisations. This group has five distinctive work streams to accommodate people who may have a partial or specific interest in aspects of children's play and the play lead noted it 'works incredibly well because people feel it is good use of their time ... they are just there to contribute to something they can contribute to'. But while there is a formal structure, the contemporary conditions affecting local authorities have put additional strain on the networks:

The worry is the climate and everything that is going on is that we are engaging with so many different things that we never used to have anything to do with but at the same time our capacity is reducing – it is only the fact that we want to try and do as much as we can that it is working as well as it can. But there will be a point at which it will explode. I am still not sure how much the message has got to the people above us ... I don't know if somebody new in post that started off as the new play officer trying to engage with different sections and directors may find it very frustrating – it is that point that it is still down to the people that you have got.

This viewpoint was shared by a Play Wales officer who noted that the PSA agenda was dependent on having some form of officer infrastructure in place, somebody named to look after Play Sufficiency:

We need some professionals in-house to support what happens at local level. My fear is that the funding and resource implications will start to have a negative impact on the support local communities receive to be more play-friendly.

These issues are revisited in Section 7.

4.6 Summary

This brief analysis of some of the responses made by local authorities over the past 12 months, often supported through the additional funding, suggests that the momentum initiated through the PSA had mostly been maintained. One play lead summarised the overall impact by noting that 'there is this commitment – what they seem to have done by bringing in the Duty has armed play officers and play development workers to be able to go to colleagues to say this is something that is important and we need you to contribute to this – just by having the Duty, even without funding has made a massive difference'.

There was clear evidence from most local authorities that partnership working had become more intensive, by increasing a shared understanding of the environmental conditions that might support children's opportunity to play. At the same time relations had extended to work in new areas and ways, most notably in schools, which many authorities noted in their PSAs were difficult to engage, and with other notable examples of new relationships being formed. The principle of intensive/extensive relatedness and the cultivation of collective wisdom form the foundations from which all actions arise and against which the effectiveness of actions can be scrutinised. While the focus for this section is largely on what has happened within, and on occasions between, local authorities, we should emphasise that the Welsh Government and key national organisations, notably Play Wales and the WLGA, have a significant role to play in this process; they are not detached bodies but are active and important elements within the entangled relationships among local authorities, local communities and children's everyday experiences. This element of relatedness is addressed in more detail in Section 7, when considering the further development of favourable conditions that may support local authorities in the next stage of implementing the Duty.

However, as previously noted, this was not uniform or unproblematic. Some local authorities reported a period of stagnation or lull following completion of the PSA, which may be attributed to lack of funding support for developments as well as the overall backdrop of public spending cuts, which as one case study interviewee noted 'makes it really difficult getting stakeholders on board as things lose momentum because things can't go any further'. It was also evident from looking at some of the spending proposals that there was still an emphasis on playground improvement and 'providing play opportunities', which may suggest that the formation of intensive/extensive collective wisdom is still in its early stages.

As noted in the introduction, the challenge facing the Welsh Government, national organisations and local authorities in the implementation of the Play Sufficiency Duty is to weave webs of social justice and equality out of the *prevailing circumstances*, and while there has been good progress made to date for many authorities, there were considerable counter forces and concerns expressed across the regional consultations and interviews, most notably the ability to maintain this momentum at a time when local authorities are facing continued budget reductions, mixed messages about funding streams, uncertainty over local authority re-organisation plans and possible implications for the immediate and near future structure of partnerships, and the potential impact that a 'neutral cost' principle for the commencement of the second stage might have in term of local authority priorities. These issues are picked up again in Section 7.

5. Rights

5.1 Rights-based policy making

Moving away from first the needs-based (Children Act, 1998) and then the outcomes focus (Every Child Matters, 2004) of the UK Government, the Welsh Government from its formation has taken a rights-based approach to policies relating to children and young people, drawing on the United Nations Convention on the Rights of the Child.³³

LSW traced the history of this rights-based approach to policies for children and young people, from the Welsh Assembly Government publication in 2000 of *Children and Young People: A framework for partnership* through *Children and Young People: Rights to action* (2004), which included Core Aim 4 specifically addressing children's play, to the *Rights of Children and Young Persons (Wales) Measure 2011*. This last Measure places a duty on Welsh Ministers to 'have due regard to the UNCRC when developing new or amending existing legislation and/or policies'.³⁴ On 1 May 2014, the second stage came into effect and Welsh Ministers now have to 'consider children's rights when exercising any of their functions',³⁵ together with the publication of a new Children's Rights Scheme (2014) setting out the arrangements to ensure compliance with the Measure. The scheme includes awareness training for Welsh Government staff and a Children's Rights Impact Assessment process that enables Ministers and staff to assess the impact of their work (including policies and initiatives) on children's rights and to carry out a formal recorded assessment if required. This offers an opportunity for

³³ Lester and Russell (2013) *Op.cit.*, p. 19

³⁴ Statement from the Minister for Communities and Tackling Poverty on the further implementation of the Rights of Children and Young Persons (Wales) Measure and the revised Children's Rights Scheme 2014, 22 April 2014, <http://wales.gov.uk/about/cabinet/decisions/dl2014/aprjun1/children/jc1331/?lang=en> (accessed 29/5/14).

³⁵ *Ibid.*

cross-departmental working at national government level towards creating environments that can support children's ability to find time and space to play, in parallel with the partnership approach required of local authorities through the Play Sufficiency Duty. As noted in *LSW*, drawing on a national interviewee's comments:

everything that governments do has an impact on children's ability to take time and space for playing, including the design of public space and roads, institutional practices in places such as schools, practices that reproduce fears both for and of children and young people, housing, economic pressures and so on.³⁶

Feedback from the regional consultation events and in interviews showed a high level of appreciation of and support for the actions taken by the Welsh Government in passing this legislation and in commencing the Play Sufficiency Duty in full, as one local authority interviewee said:

Don't stop what you're doing, keep going, because without your crucial and fundamental involvement and support, play is in danger of being decimated in Wales.

Alongside this explicit and clear support there were also some concerns regarding Welsh Government actions and messages. The Rights of Children and Young Persons (Wales) Measure 2011 offers an opportunity for cross-departmental working relating to play sufficiency that, from the perspective of local authorities, could be exploited more to support local authority work towards play sufficiency. Contradictory messages from Welsh Government departments regarding the use of funding streams such as Families First and Communities First were felt to be unhelpful (this is discussed further in 5.2 below). A second comment was that, given the experimental nature of the Play Sufficiency Duty, there was perhaps a responsibility to reflect on what had been learned from the process of 22 local authorities carrying out PSAs – a response-ability. Some local authorities voiced disappointment with the lack of detail in feedback on their PSAs given the effort put in, and others expressed a desire to have more of a national picture. They felt there was a missed opportunity in the Statutory Guidance on the second part of the Duty to give a pan-national commentary on how local authorities approached the PSAs. There was a section on good practice, but some commented that this was problematic for a number of reasons including transparency of selection criteria, the risk of merely copying without considering local conditions and limited currency. The third message, taken up again in Section 7, was about the balance between flexibility and prescription. Several people commented that without stronger and clearer messages about what is required, local authorities could fall back on the 'as far as is reasonably practicable' phrase within the Duty to justify a lack of action, particularly given the uncertainties of public spending and local government reorganisation.

It is noteworthy that one local authority, Swansea, is the first council in the UK to agree to adopt the UNCRC, officially embedding the UNCRC within the Council's policy framework and requiring the Executive of the Council (the Cabinet) to have due regard for the UNCRC in its functions, using a

³⁶ Lester and Russell (2013) *Op. cit.*, p. 9.

Children and Young People's Rights Scheme to monitor this.³⁷ Such an instrument may prove useful for supporting play sufficiency actions.

Shortly after local authorities submitted their first Play Sufficiency Assessments in March 2013, and following a successful campaign led by the International Play Association, the UN Committee on the Rights of the Child published a General Comment (No 17) on article 31 of the UNCRC. The General Comment

has been developed to address these concerns, raise the profile, awareness and understanding among States of the centrality of the rights in article 31 in the life and development of every child, and urge them to elaborate measures to ensure their implementation. The rights in article 31 have universal application in the diversity of communities and societies in the world and respect the value of all cultural traditions and forms. Every child should be able to enjoy these rights regardless of where he or she lives, his or her cultural background or his or her parental status.³⁸

It considers the importance of article 31 in the lives of children, offers a legal analysis of the two paragraphs of the article, and places it within the broader context of the UNCRC, showing how all the articles are indivisible, interdependent and interrelated. It then moves on to consider what needs to happen in order to realise article 31 rights for children, including factors for an optimum environment and challenges to be addressed. The conditions to support children's urge to be playful are worth citing in full here as there are clear parallels with efforts to secure sufficient opportunities to play:

Children have a spontaneous urge to play and participate in recreational activities and will seek out opportunities to do so in the most unfavourable environments. However, certain conditions need to be assured, in accordance with children's evolving capacities, if they are to realize their rights under article 31 to the optimum extent. As such, children should have:

- Freedom from stress;
- Freedom from social exclusion, prejudice or discrimination;
- An environment secure from social harm or violence;
- An environment sufficiently free from waste, pollution, traffic and other physical hazards to allow them to circulate freely and safely within their local neighbourhood;
- Availability of rest appropriate to their age and development;
- Availability of leisure time, free from other demands;
- Accessible space and time for play, free from adult control and management;
- Space and opportunities to play outdoors unaccompanied in a diverse and challenging physical environment, with easy access to supportive adults, when necessary;

³⁷ City and County of Swansea (2013) Report of the Cabinet Members for Opportunities for Children and Young People and Learning and Skills Council – 24 September 2013: Rights Of Children And Young People: Creating A Due Regard Duty And Embedding The United Nations Convention On The Rights Of The Child (1989).

³⁸ UNCRC (2013) *Op. cit.*, para 5.

- Opportunities to experience, interact with and play in natural environments and the animal world;
- Opportunities to invest in their own space and time so as to create and transform their world, using their imagination and languages;
- Opportunities to explore and understand the cultural and artistic heritage of their community, participate in, create and shape it;
- Opportunities to participate with other children in games, sports and other recreational activities, supported, where necessary, by trained facilitators or coaches;
- Recognition by parents, teachers and society as a whole of the value and legitimacy of the rights provided for in article 31.³⁹

The challenges that need to be addressed include a lack of recognition of the importance of article 31 rights in children's lives, unsafe and hazardous environments (particularly traffic), over programming and over protection, and a resistance to children's use of public space. On this last, the General Comment states:

States are encouraged to promote dialogue between older and younger generations to encourage greater recognition of children as rights holders, and of the importance of networks of diverse community spaces in local areas or municipalities which can accommodate the play and recreational needs of all children.⁴⁰

This acknowledges the interrelatedness of Amin's four registers: it is not sufficient to consider merely the physical design of spaces but also the ways in which contested use of space can be negotiated in order to co-produce spaces that support children's play.

After highlighting how some groups of children require particular support in order to realise article 31 rights, the General Comment concludes with a consideration of States parties' obligations in this regard. These two aspects are considered further in Sections 5.2 and 7 respectively.

5.2 Rights, needs and outcomes: tensions in understandings of play's value

As noted in *LSW*, the rights-based approach to government actions regarding children's play allows for an understanding of play's intrinsic value, its capacity to enliven things for the time of playing, as well as the more dominant instrumental value of the deferred benefits of playing in terms of its potential to address social policy agendas such as learning and development, physical and mental health and obesity reduction, crime reduction, community cohesion and so on. This 'co-existence of multipurposes'⁴¹ was acknowledged in the first Statutory Guidance on Play Sufficiency Assessments⁴² and recited in the draft Statutory Guidance on securing sufficiency of play opportunities:

The Welsh Government places great value on play and its importance in the lives of children in our society. We believe that children have a fundamental right to be able to play, and that play is

³⁹ UNCRC (2013) *Op. cit.*, para 32.

⁴⁰ UNCRC (2013) *Op. cit.*, para 38.

⁴¹ Sullivan, H. and Williams, P. (2009) The limits of coordination: community strategies and multi-purpose vehicles in Wales, *Local Government Studies*, 35 (2): 161–180.

⁴² Welsh Government (2012) *Creating a Play Friendly Wales: Statutory Guidance to Local Authorities on assessing for sufficient play opportunities for children in their areas*, Cardiff: Welsh Government.

central to their enjoyment of life and contributes to their health and well-being. We also believe that play is essential for the growth in children's cognitive; physical; social and emotional development.⁴³

The same dual understanding is acknowledged in the General Comment on article 31 of the UNCRC:

While play is often considered non-essential, the Committee reaffirms that it is a fundamental and vital dimension of the pleasure of childhood, as well as an essential component of physical, social, cognitive, emotional and spiritual development.⁴⁴

In addition, the Welsh Government extends the instrumental value of play into other policy agendas:

Play is important in its own right. It is also seen as an important tool or method in achieving other agendas relating to children's well-being and development.⁴⁵

Part B of the draft Statutory Guidance on the second part of the Play Sufficiency Duty lists some of these agendas and their related funding streams as possible sources of financial support for the Play Sufficiency Duty. This raises some tensions in terms of children's universal right to play, both in terms of funding for environmental changes that may support neighbourhood conditions for play, and also in terms of the dilemma between rights-based universal and targeted provision. Whilst recognising the Welsh Government's radical rights-based approaches to policies relating to children and young people, there is an acknowledged gap between policy and implementation, particularly given fiscal austerity measures:

The delivery of services is already being affected in Wales as a result of public expenditure cuts. It is also noted that funding often remains short term and opportunistic, limiting the impact that structures and services can have for children and young people and leaving services and structures more vulnerable to political re-prioritisation and further reductions in public spending.⁴⁶

Two key Welsh Government programmes that are listed in Part B as potential sources of funding to support Play Sufficiency are Families First and Communities First. There was much concern voiced both at the regional consultation events and in interviews over inconsistent messages regarding how these funds can be used, partly because of their targeted nature. There was strong feeling that the Statutory Guidance could offer much clearer statements that these funding streams could be used for play. The Families First Fund was introduced in 2012 to replace Cymorth funding for local authority work to support children and young people and represented a step towards more targeted services addressing child poverty. Although the programme intention is for 'a significant amount of local flexibility in the interpretation and implementation of the programme [and] local authorities are given the scope to innovate and develop services'⁴⁷ the programme also uses results-based accounting (RBA) to measure progress against identified outcomes. The Communities First

⁴³ Welsh Government (2014) *Wales: A Place Where Children Can Play. Draft Statutory Guidance to Local Authorities on securing sufficient play opportunities for children in their areas*, Cardiff: Welsh Government, p. 6.

⁴⁴ UNCRC (2013) *Op. cit.*, p. 6.

⁴⁵ Welsh Government (2013) *Op. cit.*, p. 15.

⁴⁶ Croke, R (ed) (2013) *Rights Here Right Now: Are children's rights a reality in Wales*, Cardiff: Save the Children Fund, p. 9.

⁴⁷ Ginnis, S. Pye, J., Jenkins, S. and Cox, K. (2013) *Evaluation of Families First: Year 1 report*, Cardiff: Welsh Government, p. 14.

programme started out in 2001 as a community regeneration programme that sought to encourage creativity, experimentation and risk taking, but moved through subsequent stages of capacity building, an outcomes focus and ending with targets and results-based accounting, where the shift has been from an empowering of local people to change their own circumstances through to a 'responsibilisation' of individuals to participate in state-determined and provided activities in order to lift themselves out of poverty.⁴⁸

One local authority interviewee explained how universal funding for play development staff had reduced, but they had been lucky to secure funding for staff through Families First. However

[b]ecause Families First is very focused away from play being the outcome to play being a tool for achieving additional outcomes, other people in the team cannot get involved in a universal play-as-a-right work, which means ... it is very hard for us to start things off that would be resource heavy ... It is not sufficient for anything we do now for the outcomes to be that it is a child's right to play, it now has to be putting on activity through play to support families to come together or whatever else it may be. We have to look beyond the rights and support for child's personal development. It is a resource issue (LA Play Lead interview).

This shift from universal to targeted, measurable and instrumental outcomes can also be seen between the first Statutory Guidance on carrying out PSAs, which acknowledged the co-existence of multipurposes regarding play's intrinsic value (as a right) and its instrumental value for addressing top-down policy agendas, and the second draft Statutory Guidance, which lists policy agenda funding streams that can support actions under play sufficiency, thereby linking them to instrumental outcomes more strongly than intrinsic. This is also seen in the format of the proposal form for the additional funding as discussed in section 3.3.

5.3 Rights to participation

Drawing on Amin's ideas,⁴⁹ we suggest that children have a right to 'participative parity' in the public realm. This is somewhat different from the dominant understanding of participation as engagement in the formal processes of democratic decision making, as we discussed in *LSW*. Children's play represents participation in their everyday cultures and spaces, both public and institutional. The case made in *LSW* and reiterated here is that this participative approach acknowledges both children's sophisticated knowledge about their neighbourhoods and environments, as described in Section 4.4, and also their difference. Efforts to make space more open to playing need to pay attention to that difference, together with the 'ongoingness' of the interrelationships that produce particular spaces at particular times. As Massey points out, space is the product of interrelations, a sphere of heterogeneity and is always under construction.⁵⁰ The 'throwntogetherness' of public space means that children's everyday participation may rub up against the participation of more powerful others and this needs to be negotiated with openness to difference rather than only from a perspective either of adults excluding children from particular spaces or of adults designing spaces in which children are expected to participate so that they can have their 'needs' met. This recognises rights as something held in common rather than individually, and proposes a competence rather than a deficit model. It also offers an alternative perspective to the concept of 'diverse needs' enshrined in

⁴⁸ Dick, B. (2014) 'Participatory Community Regeneration: A Discussion of Risks, Accountability and Crisis in Devolved Wales', *Urban Studies*, 51(5), pp. 959-977.

⁴⁹ Amin (2006) *Op. cit.*

⁵⁰ Massey, D. (2005) *For Space*, London: Sage.

Matter B of the PSAs, which encourages specific resources and measures for specific categories of children. This categorisation is helpful insofar as it identifies the challenges faced by some children in being able to take time and space for playing; however, as discussed in *LSW*, such categorisation runs the risk of considering diversity in terms of singularly experienced barriers without appreciating the multi-layered and heterogeneous nature of children's everyday lives. Children are not only Welsh speaking, disabled, poor, and so on: these categories are experienced in combination along with rights to 'informal and social arenas where friendships are formed and where play and recreation take place'.⁵¹

Just over half of local authorities included in their proposals for the additional money items that related to the diverse needs covered in Matter B. Much of this was for specialist or 'inclusive' equipment and resources, or about adjustments, equipment and services aimed at supporting access to services or designated play spaces. There were also specialist programmes such as playschemes, family days and activities aimed at specific groups. Although the requests need to be placed within the context of quick expenditure and the formatting of the proposal form (as already discussed), both factors that encourage reduction of complex issues to singular actions, this does point to a dominant understanding of 'diverse needs' as being about specialist equipment and access to designated provision for particular categories of need that are assumed to exist in isolation. Considering rights in the round and as held in common, together with Amin's other three registers, allows for a re-assembling of everything that goes to produce different children's experiences of everyday life.

5.4 Summary

When considering sufficiency of play opportunities, much of this is about the right to play in public and institutional space and all that entails. Amin⁵² considers how the powerful are able to restrict the rights of the less powerful to participate in everyday life in public space through a range of restrictive technologies and discourses. Taken as a category, children are less powerful than adults, and adult organisation of time and space privileges the economic over the social. Article 31 rights are about creating the conditions that support playing, and much of this is about a rebalancing in favour of accommodating difference and appreciating social aspects of life. As has been shown in the research of one local authority, children are competent in finding time and space to play in ways that adult planners may not have considered; perhaps one way of understanding 'sufficiency' is to develop this collective wisdom in order to protect (repair and maintain) such moments and spaces, as well as re-enchanting them.

6. Re-enchantment

6.1 Introduction

This final register of Amin's conditions refers to the ways in which the everyday environments of children's lives can support moments of vitality and hopefulness expressed through playing. As previously noted such environments rely on relational compatibility, a complex entanglement of multiple forces which combine to support or inhibit children's opportunity to play. The three

⁵¹ UNCRC (2013), *Op. cit.*, para 50.

⁵² Amin (2006) *Op. cit.*

previous registers explored in this report highlight ways in which the collective actions of adults may counter some of the dominant trends, habits and practices which inhibit moments of playing by making space more than a container for children's socialisation and normalisation. Re-enchantment marks a desire to recover space/time for children that affords being different, where they can become more than pupil or future citizen by imagining and creating worlds that extend beyond the limits that adults seek to impose.

There are numerous examples across the additional spend proposals, consultation events and interviews of the practical ways in which local authorities have begun to redress inequitable distribution of time/space for playing. These range across the Matters identified in the PSA Statutory Guidance and suggestions for improving time/space for play identified in individual authority action plans, with examples of pilot play street scheme projects, 'playing allowed' signage, school playtime improvement packages, continued workforce development, playground upgrades, improving access and so on.

6.2 An illustration

One particular account from a case study interview provides a wonderful illustration of an act of re-enchantment of local space. It concerns an adventure playground that has gates at either end of their site and they now have some fallen logs and tyre structures that sit outside of the playground gates. This modest intervention has simply reclaimed some public space, and when the playground workers are not on site there is still something going on: 'you can just start to see them pushing out a little more – lovely to see them start to do that... I think it has made an impact' (LA Play Lead interview). Such an experimental (and possibly subversive) act is an exemplar of this register; a relatively minor disturbance which just opens up the space to more playful possibility. It is visible and public, and may well cause some consternation to others (or not) but marks an attempt to redistribute resources, namely time/space, for the purpose of playing. As *LSW* notes, it draws in a wider 'public' into public space than may currently exist.

6.3 Challenges and experimentation

There were very few examples of such innovative, experimental and creative actions from the data collected for this follow-up report. That is not to say that such events are not happening, but the spending proposals were clearly framed in measurable and accountable acts and the consultation events were structured to address specific issues to do with the commencement of the second stage, and as such did not explicitly encourage the opportunity to recall such anecdotes and events. Nevertheless these contingent and contextual actions have great significance. The encroachment from the playground outwards is a singular example that only relates to this specific context and cannot act as a template for others to follow. Yet the micro-details contained within this event lend themselves to a series of more questions and digressions; they promote a sense of 'what if' and 'what more can be done'? It reaffirms the point made in *LSW* that the process of re-enchantment is an experimental approach that 'eschews end-states and outcomes and works with things in the making, uncertainty, surprise and astonishment'.⁵³ The example also forms part of the collective wisdom in the burgeoning partnership and networks, enhancing an understanding of how minor interventions and experiments may simply disturb taken-for-granted assumptions about children,

⁵³ Lester and Russell (2013) *Op. cit.*, p. 77.

play and space. But it also has value outside of this network and it is here that the role of Play Wales becomes significant. This is discussed in more detail in Section 7.

It is worth reiterating at this stage that the achievement of commencing the second stage is a tribute to all key stakeholders in the process and marks a significant shift in the ways in which the Welsh Government enacts legislation. What is impressive, as noted in one case study interview, is the willingness of people in the play sector and local authorities to support the Welsh Government's commitment to the Play Sufficiency Duty by consenting to commence the second stage of the Duty without any guarantee of future funding. A WLGA officer also commented on the desire of local authorities to continue the momentum gained from undertaking the PSA:

at WLGA we were very confident saying to Welsh Government, you can't stop the next stage, you're there now, you need to come forward, you need to make the next announcement on Part 2 and we need to make it clear to people that the expectation is that [it is] no cost/low cost, but not stand still, make a difference, get things done, particularly in the sufficiency audits where they identified what they were going to do, and that little bit of money that came out with it was welcomed.

An interview with a local authority play lead neatly encapsulated the positive response that the play sector and new partners had made to the challenges of implementing the Duty, paying tribute to the commitment and expertise of those in the play sector:

There were a lot of people who have been involved in play for a long period of time, they tend to be committed, and I think Welsh Government is probably very fortunate in that the people they are asking to drive through the Duty that still comes without any guarantee of additional funding is being done by people who can very clearly sustain the message of the importance of play. So there has to be so recognition of that – the play network and workforce – of how well it is working. It has definitely helped us – it has loads of stuff started (LA Play Lead interview).

There was recognition from a WLGA officer that 'these are difficult times but progress can be made in making a difference'. This viewpoint was reinforced in an interview with a Welsh Government officer who acknowledged that the decision to commence the second stage was entirely appropriate, and there had been a positive response to the cost neutral basis and 'doing things in a more innovative and partnership way to achieve the desired outcomes'.

The commitment that Welsh Government and local authorities have made to the Play Sufficiency Duty, as both part of the anti-poverty and children's rights policy framework, may be of considerable importance over the coming period. At a time when the UK Government's austerity programme is predicted to significantly increase levels of child poverty across the UK with families and children in Wales set to be hit particularly hard,⁵⁴ there is great potential for a state of disenchantment to set in. Certainly it was there in the background in many of the interviews and consultation events:

The major [issue] for us of course is that as play is a non-statutory service it is subject to budget savings. And we are currently, in this financial year, are having to take [a significant figure] out of our play budget.

⁵⁴ Croke, R (ed) (2013) *Op. cit.*

Another authority noted at a consultation event how ten years of development of open-access play provision was now under threat, while others reported budget cuts and loss of play services. A Play Wales officer also commented:

...what we saw was the evidence that the wider constituency whose work isn't directly children's play, but whose work has impact on play were far more *au fait* with play and their role. But I guess, the anxiety I would have is that there is the potential for the momentum to be lost because of very significant local authority changes as a result of the cuts, which we will see repeated again next year.

We turn to another specific example from a case study authority at this point to illustrate how the elements of rights, relatedness, repair and maintenance may combine to counter the worst effects of budget cuts. The local authority, in response to funding reductions, has handed over the majority of its fixed equipment playgrounds (120 in total) to Community Councils. The play lead noted that it was fortunate that most Community Councils agreed to this but there were negatives and positives associated with this situation. On the negative side some of the staffed play provision had been cut to support Community Councils in maintaining the playgrounds, but on the positive side there was the possibility of the play development team, and the wider play partnership, to strengthen their relationship with Community Councils as they support them in this new role. One particular locality was cited as an example where there were five local and traditional playgrounds, some in quite poor condition, but as the play lead noted, there was a 'real opportunity here to facilitate a process to consider all those spaces together rather than treat them individually and having five spaces look all the same'. Drawing on experiences from undertaking the PSA, attention was being given to considering the ways in which children may move in and between these spaces. This may involve landscaping, introducing natural materials and so on. The point is that the circumstances may enable the opportunity to think and act differently about the ways in which community spaces may be connected. It is experimental:

mapping stuff out so they have an idea of where those spaces are and then working with them to come up with some principles for when they are developing those spaces – what are their guiding principles and the idea that the development of those spaces happens over a long period of time so you don't just consult and build you actually might consider removing stuff that isn't good enough and seeing what happens – we might just give spaces over to children and let it evolve – it would be really interesting.

What we have here is another example of the register of re-enchantment and of the ways in which strong partnerships, under the guidance of an experienced and knowledgeable play lead, drawing on and at the same time enhancing collective wisdom, can make a positive response to the prevailing circumstances to maintain children's ability to find time/space for playing.

6.4 Summary

A presentation made by a WLGA officer at one of the consultation events noted that the update on progress made by local authorities showed 'growing confidence in the policy area and allowed us to consider taking the policy agenda forward and sustaining it; there is evidence that the sector is innovative and creative and able to respond'. Local authorities have responded in a timely and creative manner to the announcement of additional funding to implement a range of interventions designed to enhance the capacity to secure a sufficiency of play opportunities. The brief examples

given in this section begin to add to this process; they are local responses that highlight the capability to re-work conditions in favour of children's opportunity to play. While local, they are also exemplars of ways in which 'low-cost/no cost' experimental actions of maintenance and repair can be initiated through the compilation and enactment of collective wisdom. While the formal implementation frameworks and requirements of the Play Sufficiency Duty with its sufficiency assessment, toolkit and action plans may have dominated the process to date, there has to be room for acknowledging the importance of these minor processes and the ways that they play out in the everyday lives of children (and the importance of research during the next stage to begin to capture some of the complexities of this process to add to collective wisdom). *LSW* reported on the sense of excitement among what has been traditionally seen as 'non-play' roles within local authority, and the growth of relatedness over the past 12 months has strengthened partnerships and networks; sharing examples of minor local experiments and responses can maintain this momentum.

LSW acknowledged the Welsh Government's principled attempt to maintain values of traditional welfarism, partnership working and participation, and to protect universal services and rights of all citizens. This is becoming increasingly difficult in the face of UK government spending allocations and more general welfare reforms. The uncertainty and insecurity that this inculcates is real, as acknowledged by many of the participants in the consultation events. And while the principle of neutral cost has been accepted by the Welsh Government and local authorities, this should not preclude taking every opportunity to continue to resource the efforts of local authority Play Sufficiency partnerships. This principle is established in UNCRC General Comment 17, which while acknowledging the problems arising from limited resources, obliges State parties 'to strive to ensure the widest possible enjoyment of the relevant rights under the *prevailing circumstances*'.⁵⁵ The General Comment goes on to state that 'no regressive measures in relation to the rights under article 31 are permitted' and if any measures were taken, governments would have to show that due deliberation was given to consider all possible alternatives.

Forces of re-enchantment and the accompanying and interrelated registers of repair, relatedness and rights may hold off the deleterious effects that austerity policies can have, but it does rely on establishing favourable conditions for this to take place. A play lead commented unless the second stage was commenced 'things are only going to get worse', but 'if you are going to do this then you do really need to show your commitment to it as well'. And so attention turns at this point to ways in which the principles of repair, relatedness, rights and re-enchantment might be maintained as the second stage is commenced.

7. Continuing to develop favourable conditions to support local authorities

7.1 Introduction

This report has introduced some of the positive developments and changes that have occurred across local authorities over the past 12 months. Each authority has approached this in relation to the unique prevailing conditions that apply to their area, and as noted in *LSW*, there is no universal blueprint to apply. As we have looked at the data, particularly from interviews and the consultation events, it is also evident that all local authorities are

⁵⁵ UNCRC (2013) *Op. cit.*, para 55.

facing challenging circumstances, and there have been a number of concerns and positive suggestions raised about what might be needed to maintain the momentum as the second stage is introduced. These have implications for each partnership, but as briefly introduced throughout the report, these are areas where the relationships and interaction between the Welsh Government and Play Wales are particularly complex. The intention of this section of the report is to summarise some of the issues and proffer suggestions. As with everything else, they are interconnected and they are only separated out into these headings for ease of presentation.

7.2 The role of Statutory Guidance

As with the introduction of the PSA, the commencement of the second stage is accompanied by Statutory Guidance, and the draft of this was made available for consultation before the final version is produced. Numerous comments were made about this by local authorities and national organisations in the consultation events and interviews. Many of these will have been submitted to the Welsh Government via the consultation process, but we introduce some of the key concerns here along with some further observations, including connecting to the General Comment on article 31.

While the Duty is being commenced in two stages, these are not separate but mutually entangled; assessing and securing are iterative processes, looking at what currently exists and the potential barriers to playing leads to actions being taken, the effectiveness of which is assessed and feeds back into future actions. As an interview with a play lead noted, the Statutory Guidance for the PSAs was very clear in the nine Matters that needed to be addressed while at the same time allowing for creativity and experimentation. These Matters will be the framework for the next stage of reporting as local authorities have to complete another Sufficiency Assessment in 2016. Many commented that the draft Statutory Guidance on the second part of the Duty did not actually 'guide', and several commentators expressed the hope that it was amended to establish a closer and more coherent link with *Creating a Play Friendly Wales*:

if they bring that together more coherently, if they have a bridging section which talks about what they learned from the process, reference perhaps *LSW* a little bit and actually I think the success of Part 2 will ride very much on what Welsh Government produce in terms of this Guide' (Play Wales officer interview).

This is matched by comments that suggested the content of the document was lacking in clear direction:

[the Statutory Guidance] doesn't seem like it has moved on – there isn't any talk about what has happened, how Welsh Government learning has developed and particularly the things that they now know are minimum requirements that local authorities need to be doing. There should be statements about what local authorities should be doing, not saying how they might do it. Where is the lead coming from, how do you involve your partners? I would like to see that in there.

This was a recurrent theme in the consultation events and interviews. Given the lack of funding, there was a strong sense that the Statutory Guidance needed to have more teeth so that play leads could use it to require colleagues across the authority to engage with the process. Funding cuts, staff reductions, greater workloads and competing priorities may all converge to push the Play Sufficiency Duty down the list of priorities, and it was felt that the Statutory Guidance was the appropriate

instrument for ensuring cross-departmental and pan-authority participation; it was also felt that the Statutory Guidance could give a stronger lead on requirements relating to partnerships and the political scrutiny process. Issues of accountability and coherence are addressed in the following sections.

Some local authorities are putting in place mechanisms to strengthen Play Sufficiency partnerships that connect with ideas on 'relatedness' in Section 4 and that can be actioned on a cost-neutral basis. One of these is the idea of a play pledge or play charter to which heads of departments sign up to show they are committed to implementing the statutory duty and making sure that all staff are engaged. *LSW* identified the importance of high level engagement with the Duty, including at heads of service level, and this issue has remained, as noted in discussion with a Play Wales officer who remarked 'this is something we have identified for years ... it is very rare that a senior officer has a lead responsibility for play'. The officer noted that although technically the Director of Children's Services is designated as the lead for implementing the Play Sufficiency Duty, which is a legal requirement in Wales, 'I am not aware of that having any impact at all'. Some play leads expressed anxiety that the momentum that had developed through the PSA process and subsequent implementation would be lost without high level commitment, and pledges were seen as a way of publicly reinforcing the Duty. However, others critiqued this approach, suggesting that pledges might be understood as the language of the disenfranchised and potentially trivialised the full power of a statutory duty.

One participant at a consultation event observed that the Play Sufficiency Duty relied on key people being there when decisions were being made: 'if corporate directors don't care, it's not going to happen. Who fights for the duty in the authority? How does that influence work?' This was supported by a Welsh Government officer who commented that what came across in consultation events was that each local authority needs to keep a watching brief because things can fall off the agenda: 'within local authorities and in many other settings play does need champions. It does need people to emphasise the importance of play in children's lives so that it forms an integral part of future plans'. This also extends into the political arena as noted in one local authority interview in which a Cabinet member's 'passion for play' and support for children's rights will be an important driver at a time when there is less money available.

Another action in at least one local authority was to nominate individuals from each local authority department to act as a strategic lead for Play Sufficiency: 'each relevant service area would have somebody in there you would recognise as a point of contact'. The nominated play champions form the play sufficiency partnership, together with community sector representatives. Formalising what may be already existing relationships may resolve current outstanding issues about representation and links to other departments. It 'all comes down to whether people want to participate and that's alright to a degree but what if people don't want to do it – there needs to be some way of making sure that the service area is engaged'.

The main point from this is that the Statutory Guidance could give more explicit requirements for the formation of effective partnerships, as this represents the foundations for sustaining the momentum built to date yet at the same time sits within the neutral cost principle.

The second suggestion in strengthening the Statutory Guidance that arose from the consultation events and interviews is the role of the political scrutiny process. The draft Statutory Guidance reiterates the point made in the first Statutory Guidance to support PSAs:

Creating a Play Friendly Wales: point 10, Matter I, states that "The Local Authority should examine its entire policy agenda for its potential impact on playing children and embed targets and actions to enhance children's play opportunities into all such strategies and policies". Under the duty to secure sufficient play opportunities it is expected that Local Authorities will ensure that all their actions contribute to improving play, so far as reasonably practicable and do not have a negative impact through lack of consideration.⁵⁶

The suggestion is that this could be made a more explicit requirement along the lines of a Play Impact Assessment, or an amendment to existing impact assessments, in order that all Council business be examined for its impact on children's ability to find time and space to play. As one interview said:

I think it is really important that the Welsh Government talks about what it is doing and I would like to see Welsh Government develop an action plan just like local authorities. There was something in there – a really good example of what WG were doing – their impact assessing against UNCRC. Well I think there is an opportunity for them to say if we are doing this, you guys can do it. The Welsh Government isn't getting any more money but they are managing to change the way they work, so that is a really good example of where they could say local authorities should do the same.

The example has already been given in Section 5.1 of Swansea Council adopting the UNCRC and introducing the requirement for the Council Executive to have due regard for children's play in all its functions, in an echo of the Rights of Children and Young Persons (Wales) Measure 2011.

7.3 Accountability

Another key issue regarding the Statutory Guidance, linked to the scrutiny process, is that of accountability. As noted, the commencement of the second stage within a framework of neutral cost has created some concerns. Several participants at the consultation events commented the Statutory Guidance needs to be very clear given the vagueness of the wording of the Duty itself: 'must secure sufficient play opportunities in its area for children, so far as reasonably practicable':

Well the difficulty I think is what you probably heard discussed quite a lot at the consultation event, was there are those famous words of reasonableness, aren't there. It doesn't actually say you have got to do x, y and z. And therefore, if you don't do x, y and z, we are going to come after you. And until they do something like that, it's basically up to each local authority to decide what is reasonable (LA interview).

The Statutory Guidance does ask for an Annual Plan, but where does this go? Who is going to hold local authorities to task on this? 'As far as is reasonably practicable' is open to interpretation (Consultation event notes).

Who makes sure that local authorities do meet their statutory duty? Is it left to self-regulation? (Consultation event notes).

⁵⁶ Welsh Government (2014) *Op. cit.*, p. 11.

Discussions at consultation events and in interviews showed a fair level of support for some system of external accountability and scrutiny, possibly through Estyn's inspection of local authorities. There is a tension here between the desire amongst play advocates to hold local authorities to account and for this to support the work of play leads within authorities on the one hand, and on the other a concern that the inspection and external audit system can both produce unintended outcomes (such as guiding work in a ways that will respond to themes in inspection rather than what is felt to be the most appropriate way of working) and reduce complex issues to mere technical tick sheets, particularly if the inspector is not familiar with ideas about creating conditions that support children's play both in designated provision and the general environment. Discussions in interviews also revealed a confusion regarding Estyn's involvement, with some not appreciating that the suggestion is to adapt or extend Estyn's inspection of the local authority as a whole in terms of their education services for children and young people. Play Wales' response to the consultation on the draft Statutory Guidance strongly advised Welsh Government to consider and make public how it intends monitoring activity and progress. It further recommends that Estyn, through the inspection procedure, be directed to ask a range of questions regarding Play Sufficiency. Suggested questions had been included in the earlier draft Play Wales response, and included issues such as identifying the lead for play sufficiency within the local authority, describing the scrutiny process and partnership structure, and how information regarding play opportunities and play sufficiency is published.

Such questions are in line with the strategic approach outlined in Section 7.2, and are aimed at encouraging local authorities to put in place the necessary partnerships and procedures that will support the play sufficiency process rather than specifying more prescriptive targets or outcomes. Nevertheless, concerns have also been expressed regarding a lack of 'occupational competence' in understanding the Play Sufficiency Duty amongst those whose expertise is in education services.

7.4 Coherence

In a report on the state of children's rights in Wales,⁵⁷ there was a recognition that more needs to be done to integrate shared policy priorities, with particular reference to the children's rights agenda, across government departments and between national and local government and other sectors. The report highlights the

need for concerted action in reducing the implementation gap between national policy rhetoric and local delivery. Programmes and initiatives need to be better integrated to work together more effectively to achieve the necessary strategic impact.⁵⁸

The evidence from *LSW* and the limited data available for this follow-up report suggest that in terms of the Play Sufficiency Duty there is a degree of coherence between the responsible Welsh Government department and local authorities, and certainly the framework established for assessing play sufficiency has given clear focus and direction to play partnerships. However, there are still concerns around the disconnection at national level between national initiatives, as noted at consultation events, seen in comments regarding the coherence between initiatives, policies and funding streams such as 21st Century Schools, Communities First and Families First, with participants noting a real challenge to embed play in other strategies. One particular issue seems to be around

⁵⁷ Croke (2013) *Op. cit.*

⁵⁸ *Ibid.*, p. 12.

the availability of Families First funding to support play provision. As raised in Section 5.2, the shift towards more targeted services in the change from Cymorth to Families First funding in 2012 resulted in

a significant hiatus in funding for play provision across Wales. In most instances the resulting challenges have been resolved, but in a few cases this has resulted in the wholesale reduction in Government funding being used to support play provision.⁵⁹

This change, together with the cessation of Big Lottery funding and the general public service spending cuts, has meant that in some authorities the infrastructure that supported play development has been lost. As discussed in Sections 4.5 and 5.2, both the loss of funding and the increasing targeting and results focus of what remains could have a significant effect on stability and continuity of relationships and expertise within local authorities as well as direct funding for initiatives that may not meet current criteria. This issue still appears to be a matter of concern and was raised at consultation events and interviews. Given that, as *Creating a Play Friendly Wales* clearly establishes, developing conditions to support children's play requires cross-sector work, there is a need for the Welsh Government to lead by example and be seen to work cross-departmentally. In interview, a Welsh Government officer acknowledged that the Play Sufficiency Duty has supported efforts to embed considerations of children's play into other policy initiatives. For example, the guidance on Single Integrated Plans⁶⁰ includes the Play Sufficiency Duty in the list of statutory obligations to be included in the SIP. In addition, it has also been possible to argue for ensuring that play is included in discussions on the Future Generations Bill, possibly through SIP inclusion. The same issues pertain at national level as at local level in terms of how children's play may speak to the interests of colleagues in other departments:

The Welsh Government has made a firm commitment to improve play opportunities for all children in Wales. We recognise the importance of play in relation to education and how play supports children's learning and development. We also recognise the contribution play makes to children's health through physical activity and combatting childhood obesity. The Active Travel Act is important in supporting children's play through making the environment safer for walking and cycling.

Nevertheless, some expressed a feeling that cross-departmental working at national level was not evident from their perspective and it was suggested that if the Welsh Government is not already doing so, it should look at establishing and reporting on mechanisms that facilitate joint-working, including external stakeholder groups, across ministerial portfolios in order to consider how current policy initiatives, funding streams and policy guidance can be best used to support the Play Sufficiency Agenda. In addition, there was a suggestion that the Welsh Government should publish its own Play Sufficiency Duty action plan that includes cross-cutting agreements on use of funding streams. This may be an opportunity for the Welsh Government to contribute to the iterative process of building collective wisdom by sharing what it, as a national government, has learned from the process to date and how this can be used to shape the future direction of the Play Sufficiency Duty.

⁵⁹ Play Wales (2013) Editorial, *Play for Wales*, Issue 40, p. 2.

⁶⁰ Welsh Government (2012) *Shared Purpose – Shared Delivery: Guidance on integrating partnerships and plans*, Cardiff: Welsh Government, p. 5.

7.5 Building collective wisdom

The issue of whether more specific requirements are included in the Statutory Guidance is a delicate balancing act with the potential danger of being over-prescriptive and reinforcing a formulaic rather than creative, emergent approach that is responsive to local conditions. Issues of accountability are important given the 'cost-neutral' element of the second stage and the potential for momentum to be stalled as play sufficiency may be seen as lower priority within local authorities, but several comments from consultation events and interviews raise some concerns over the role that Estyn might have, as discussed in Section 7.2. Accompanying this, there are concerns over some of the apparent tensions and lack of coherence across policy initiatives and funding mechanisms.

Play Wales has co-ordinated a response from the sector that presents a series of recommendations for the draft Statutory Guidance. The Statutory Guidance is a policy instrument that articulates the expectations of Welsh Government for the next stage of the Play Sufficiency Duty and as such it is important that attention is given to ensuring that it provides a clear framework and direction to support local authorities, particularly in the absence of dedicated funding. But as noted in *LSW*, how this is implemented is not straight-forward; while the Guidance, toolkits, recording forms and so on may seek to focus and normalise responses, this is balanced by the recognition that local authorities should be able to determine their own strategic priorities according to identified needs. Equally, there are multiple actors and actants involved in the process of securing a sufficiency of play opportunities and much of the ongoing, everyday relational processes that enact the Duty fall outside of the instrumental recording and accounting systems. These have equal, if not more important, value when it comes to developing collective wisdom across local and national scales of operation. As discussed in *LSW*, accounting for playing is simply not possible, as a WLGA officer acknowledges:

Quite a bit of the play agenda is a bit ethereal, you can't just count the number of managed play spaces because play is freely chosen so if it's managed – yet there's an opportunity there to play but what about all the other general play that goes on after school, in school. I live right next to a village green and it's just there, they just use it and my grandchildren come down and they just go and play. Last week they were collecting slow worms in the church yard ... there's no adults supervising them.

As such we return attention to the ways in which 'learning' (past, current and future) is best used to maintain the progress made to date. One of the common issues identified in the draft Statutory Guidance is the inclusion of examples of good practice in the annex. Comments from participants at consultation event questioned the value of some of the examples, queried how judgments were made about inclusion, identified the potential danger of seeing these as things that elected members felt were requirements, noted the ways in which these become outdated quickly, and regretted the lack of any explanation of how these specific actions were arrived at. There was a general consensus that these should not be included in the Statutory Guidance itself, but this does then raise an issue of how the contingent, often minor, everyday stuff, and the ways in which it may contribute to opening up environments for playing are captured and shared.

At various stages in this report we have commented on the ways in which Play Wales has contributed to supporting developments, for example, through publishing guidance and toolkits, facilitating seminars and conferences at local, regional and national level, developing training and

qualifications with supporting resources, and contributing to more informal support and guidance processes with local authorities. Their significant partnership role in working with the Welsh Government and WLGA to implement the Play Sufficiency Duty was highlighted in *LSW* and continues to be valued, as a Welsh Government officer commented:

We have worked closely with Play Wales in the engagement process for the play legislation, and value their role in working with the play sector.

This was also acknowledged by a local authority play lead in interview:

[Play Wales'] success has always been working with Welsh Government rather than against it – so much of this is down to the work they have done, so I am hoping they can continue to have that kind of influence.

Discussions with play leads also suggest that Play Wales should have a significant role to play in being a repository of the growing evidence of practice within local authorities to 'reflect what is going on locally' (LA Play Lead interview) and to disseminate this at national and regional level. Another commented that 'it is pointless to have paper documents on examples of good practice because they become outdated so quickly' and there needs to be 'a website with a gatekeeper ... probably best on Play Wales' website'. Interviews with Play Wales officers indicated that they see this as a significant part of their future strategic role:

It seems to me that Play Wales is one organisation that can do that – and that seemed to be coming out in some of the events – well in all of the events. Play Wales was mentioned more than once in terms of influencing the annex and holding the evidence.

This was echoed in an interview with a local authority play lead:

Play Wales have got that role – talking about good examples, providing people with advice and support, sharing information ... It seems to me they have been part of the process all the way along and they fit that role perfectly.

Given what has been said in *LSW* and in this report about the nature of knowledge, the importance of supporting the development of collective wisdom, and the importance of anecdotes, stories, shared experiences in this process, we would suggest that such a repository is a crucial complement to the technical focus on compliance and accountability. We discussed earlier the potential in the current climate for a sense of disenchantment to permeate the next stage of implementation. Simply countering this with more prescriptions is, on its own, unlikely to maintain the sense of optimism and commitment that has been generated to date. The founding principles for the Play Sufficiency Duty recognise the vitality of playing for all children, for its own sake and also because of this, the benefits it may have in countering some of the effects of current austerity measures.

Greater attention needs to be paid to what is already happening, and to realise that children by and large can create moments of playing if conditions are favourable. This does not require much in terms of funding but it does necessitate key and stable drivers for change within national and local organisations and changes in practice to experiment with new possibilities that may have been previously not considered or closed off. As noted, these events matter as they contribute to developing collective wisdom but there seems little opportunity at the moment (with some notable exceptions) to capture and share these, not with the intention of replication but rather to continue to build a community of learning and practice.

8. Concluding remarks

The concluding section of *LSW* recognises the achievement of the 'Welsh Government and their national partners Play Wales and the Welsh Local Government Association for having the courage to take this bold and innovative step'.⁶¹ Since that time, the release of General Comment 17 reaffirms the value of the direction that this collaborative partnership has steered and certainly there is international interest in what has been achieved to date and what the next stage of implementation may deliver. The Duty for local authorities to assess the sufficiency of play opportunities has established foundations for thinking differently and collectively about the ways in which everyday environments may include or exclude children as citizens-in-common. While each authority has a different starting position arising from unique historic, economic, cultural, political and social factors, it is evident from this small-scale study that the momentum gained from undertaking the initial assessment has been maintained through the implementation of action plans. Certainly long established boundaries between local authority departments have become blurred with the growing appreciations that all have a shared responsibility in creating environments where children can play'

The important point here is to acknowledge that spaces are relational achievements, brought about by encounters between diverse bodies, symbols and materials, near and remote, in an on-going, contingent, dynamic and complex process; spaces are always being produced and as such always open to new possibilities. This shifts the traditional focus from seeing children's play as something that simply belongs in adult designated and designed places. Although these have value, to paying attention to the ways in which relational conditions work collectively to ameliorate exclusive forces (as suggested by Amin's registers of repair, relatedness, rights and re-enchantment). Such a position is entirely consistent with the Welsh Government's broader commitment to support children's rights, well-being and ensuring equitable distribution of resources to support children and their families.

Data from the local authorities and interviews with national officers indicate the interim period between the first and second stage of the Duty has been an opportunity to strengthen partnership working, within and between authorities, with valued support from Play Wales. This has enhanced the formation and application of collective wisdom, as evidenced in some of the case study authorities by sophisticated and creative responses to establishing spatial/relational conditions to support opportunities to play.

The achievement of introducing the second stage of the Duty to secure a sufficiency of play opportunities is a testimony to the commitment that national and local partners have brought to this not inconsiderable endeavour. As noted in interviews, not to commence the second part would have harmful impact on progress to date. The agreement to implement this on a 'cost-neutral' basis presents considerable challenge in itself, and one that authorities are embracing in small-scale but influential ways. And of course, as noted in all consultation events and interviews, this is set against the serious deleterious effects of austerity.

As this report and *LSW* highlight, the continuous development of collective wisdom will be vital in the next period in order to hold off *disenchanting* forces. This is not a predictable, uniform, linear and consensual process; collective wisdom, in this sense, implies developing approaches that are

⁶¹ Lester and Russell, (2013) *op. cit.* p79

open, experimental and responsive to ever-changing conditions. This is challenging at the best of times. The existence of the Duty and its overall intention is itself a powerful supporting tool; to this can be added an effective balance between the vagueness of the concept of sufficiency on the one hand and on the other appropriate supportive but non-prescriptive guidance that facilitates innovation and can be used within local authorities to hold partners to account. In addition, attention needs to be paid to continued support for the growth of partnership working at national, regional and local level and the accompanying development of national and local intelligences.

The intensification of collective wisdom and extensive connections with a widening 'play' constituency are resilient and resourceful foundations for future success. As such, the gains made to date through multiple and interwoven networks of practice (from micro everyday relationships between adults and children to national policy formulation and implementation) must, as far as possible, be protected and strengthened. We would also suggest that as the second part of the Duty is commenced that careful consideration is given to the ways in which local authority actions and approaches are captured during the process to iteratively feed into the continuous formulation of collective wisdom. Taken together, these should help to develop a growing shared appreciation of the nature and value of children's playful relationships with time and space and how adults can support this.

We end this report with a quotation from one interview about how the growing attention to play fits with a sense of what matters in life.

I think it's a really positive thing and it is moving forward in all sorts of areas as regards town planning. We shouldn't just be dominated by cars and that adult control of the environment and control of life, so it is a whole consideration of children, what's important in children's lives and what's important for their present and future happiness and well-being. So I think there's been a growing awareness and concern about it in all sorts of different organisations and the media generally, saying we can't just carry on the way that we did, amassing vast debt and the whole disposable throwaway society, that sort of mindset, the whole thing to do with climate change, just the way people live their lives. The idea about play, the very free and open way, that it's not to do with material things necessarily, it's to do with open space, the attitudes and some resources of course but, you know what I mean, that fits well I think with the way hopefully society's moving and people are thinking at the present time.