

# Executive summary



## Leopard Skin Wellies, a Top Hat and a Vacuum Cleaner Hose:

An analysis of Wales' Play Sufficiency Assessment duty



This report presents the findings from a small-scale research project exploring how local authorities respond to the introduction of the duty to assess sufficiency of play opportunities for children, the first part of the Play Sufficiency Duty as set out in the Children & Families (Wales) Measure 2010, Section 11. The research was carried out by Stuart Lester and Wendy Russell of the University of Gloucestershire with support from Dr Owain Jones and Nick Lewis of the Countryside and Communities Research Institute (CCRI) based at the University of Gloucestershire.

It draws on data from 20 local authority Play Sufficiency Assessments (PSAs) and associated documentation, interviews and notes from stakeholder meetings in three local authority case studies, notes from attending regional meetings to share experiences across local authorities, interviews with a Welsh Government officer and key officers from national partners (Play Wales and Welsh Local Government Association) and an online survey for key stakeholders involved in the PSA process.

Wales is the first country in the world to legislate for children's play. The Children and Families (Wales) Measure 2010, Section 11 places a statutory duty on local authorities to assess and, as far as is reasonably practicable, secure sufficiency of play opportunities for children.

The completion of the first stage of implementation coincides with the publication by the UN Committee on the Rights of the Child of a General Comment on Article 31 of the UNCRC, which specifically recommends that governments consider the introduction of legislation that addresses the principle of sufficiency. Given this, the Welsh Play Sufficiency Duty should be of great interest to other governments across the world.

However, 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.

**Section 2** of the report offers a policy analysis of the Play Sufficiency Assessment, looking at policy narratives within the Welsh Government since devolution, particularly narratives of partnership, welfarism and social justice, and citizen engagement, showing how these translate directly into policies relating to children's play:

1. The partnership narrative can be seen in the partnerships between the Welsh Government, Play Wales and the Welsh Local Government Association, which were particularly successful in the development of the Statutory Guidance and toolkit for the Play Sufficiency Assessment.
2. The social justice narrative can be seen in the Welsh Government's move to base its policies for children and young people on the UNCRC, and this has allowed a broader understanding of play that includes and moves beyond its instrumental value in helping to address policy issues of physical and mental health and wellbeing, readiness for school, children's development and community cohesion, to embrace play's intrinsic value as a right for children.
3. The engagement narrative can be seen in the Welsh Government's commitment to children's participation and consultation, and this was also evident on the PSA, although its implementation varied across local authorities from largely technical online surveys to in-depth working with children in an authentic effort to understand their particular, situated and rich knowledge and experiences of their own environments.

**Section 3** looks in detail at the Statutory Guidance and toolkit as instruments to support and guide local authorities in gathering and reporting on information for their PSA. It considers the (limited) place of



knowledge and the power of language in policy making: whilst knowledge is useful, decisions are usually made drawing on a broader range of issues such as history, context, relationships and other locally contingent factors. Sometimes too much of a focus on ‘facts’ occludes everyday collective wisdom about the idiosyncrasies of children’s play patterns, and language used can influence the way that issues are understood and then acted upon.

The design of the Guidance and the toolkit had a number of intentions: to balance ambiguity with prescription in order to give guidance but allow for local contexts; to encourage dialogue as a way of producing shared knowledge regarding children’s play and thus to influence future awareness and policy decisions; and to take account of children’s play in all policy and implementation agendas.

**Section 4** of the report explores some of the key themes that have emerged from the process of completing PSAs and action plans. It examines the ways in which the framing structures of the Duty, namely the Guidance and accompanying toolkit, have shaped local authority responses in arriving at judgments of the current levels of sufficiency of play opportunities. For those undertaking the PSAs, this was an intensive and challenging process involving partnership working across departments and with other stakeholders, particularly the voluntary sector. It also, to varying extents, prompted a rethink about local authority responsibility for children’s play and a wider appreciation of how current practices might support or inhibit children’s ability to take time and space for playing.

Each PSA is a reflection of the current state of understanding, attitudes, priorities, working relationships, and economic, social and political factors within the authority. Some local authorities started the PSA process from a relatively weak position, with little history of partnership working across the key themes of the Sufficiency Duty. In these cases the template has been followed in a fairly linear and technical manner and there is a general disconnection between the information provided and considerations for developing an environmental approach to supporting children’s play. Other local authorities had a stronger starting position, often with pre-existing play partnerships and an operational play strategy in place. Here the requirement to complete the PSA has extended these arrangements to develop a more integrated approach to the issues. The thematic analysis of data is framed and presented by drawing on Amin’s account of the good city. It is adapted to the specific context of

children’s play and considers four ‘registers’, or essential constituents, that combine to produce environments that are open to children’s playful presence. It acknowledges 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. Amin’s four registers are:

1. *Repair and maintenance*: This register critically examines the way space works in order to reveal the ways in which citizens are included and excluded, thereby facilitating a process of repair to make spaces more equitable. In terms of the Play Sufficiency Duty this register refers to ways local authorities assess the value and capacity of diverse spaces for supporting play opportunities. For ease of discussion it aggregates public open, green, and designated spaces for play alongside institutional adult-supervised environments (playwork provision and school playgrounds) to primarily cover Matters C, D and F.
2. *Relatedness*: Adapting from Amin’s analysis, relatedness refers to the ways in which adults acknowledge that children are other-than-adult and care for this difference. It recognises that children inhabit the same environment as adults, experience it differently, and have a right to actualise what the environment offers for them as children.

In terms of the Duty, all Matters may be viewed as relational in the sense that children’s relationship with their environments are produced through encounters with others (children and adults) both directly at local level and more remotely by the influence of adults in shaping local conditions. As is evident, the issue of relatedness is extremely wide-ranging in scope and operates across multiple levels of analysis, from everyday encounters between adults and children to the ways in which governance actors develop their understandings, responsibility and enactments in shaping policies, spaces and practices.

3. *Rights*: It is timely that the Welsh Government has embarked on this stage of a long journey given the recent publication by the UNCRC of General Comment (17) on Article 31 which clearly acknowledges supporting children's right to play involves cross cutting approaches that extend beyond provision. The General Comment also re-positions Article 31 from an isolated right to one intimately connected with other UNCRC participation articles, namely Article 15 (children's right for free association and peaceful assembly); Article 14 (respect for children's freedom of thought); Article 13 (children's freedom of expression); and Article 12 (the right to express views freely in all matters affecting the child). As such the focus on establishing favourable environmental conditions for play and the constituent elements of the PSA process fully align with the main thrust of the General Comment.

An analysis of PSAs reveals that most make direct reference to children's right to play in the opening principles statement but this tends not to be explicitly tracked through into the completion of the individual toolkit sections; as such rights become disconnected from judgements of play sufficiency and associated actions. This is further evidenced in the report by looking at two key themes within the Duty: firstly the requirement to consult with children and secondly to provide for diverse needs.

4. *Re-enchantment*: The final register from Amin's analysis refers to the ways in which habitual practices, policies, symbols, common-sense assumptions and so on are subjected to critical scrutiny to reveal the ways in which they might support or constrain the environmental conditions for play opportunities. Having made these revelations, actions may be taken to reconfigure or re-enchant existing conditions to make environments more open for playing. In the context of the PSA process it refers to the ways in which judgments of sufficiency are then taken forward into a series of actions to re-enliven or protect spaces.

Key themes arising from the analysis:

1. In many local authorities, the Duty has strengthened existing partnerships both within the authority and also with other key stakeholders, particularly the voluntary sector, although this was

not uniform. It has brought together local authority departments who traditionally may have been perceived to have little in common with regards to children's play, most notably planning and local development, transport and highways, and environment.

2. Some PSAs have developed a range of approaches to consultation with children (and in some cases adults) that extends beyond tokenistic and abstract surveys to reveal that children have a wealth of situated knowledge about their environments and how space/time and attitudes shape their everyday interactions.
3. When children's situated knowledge is given higher profile and combined with professional expertise, including the influential role of voluntary sector organisations, and other key sources of information, partnerships are forming 'collective wisdom', that is, a more nuanced consideration of the ways in which local environments may enhance or inhibit children's ability to find time and space for playing.
4. This growing wisdom and accompanying shared narrative allows for a more coherent and cohesive approach to addressing the PSA Matters rather than treating them as discrete entities. It provides the foundations for dealing with the messy, multiple and complex variables that contribute to the production of play friendly environments. Thus, for example, an integrated partnership approach based on the value children attribute to playing in informal spaces close to home can address issues that range across micro 'street' level actions (signs, street closures, playwork interventions, protection of small 'waste-ground' sites), issues of community engagement (advocacy, community play audits), to broader policy issues (traffic regulations, accessible street closure procedures) and so on.

## Conclusions

The Welsh Government and its partners, Play Wales and the Welsh Local Government Association, are to be heartily congratulated for taking this bold step into what is potentially a new landscape for government understanding about children's play. As one interviewee commented, 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.

The PSA process has required local authorities to consider 111 criteria that have an impact on children's environments. Our analysis has shown that responses to these have varied, but that all 22 local authorities have to varying extents considered them all. If momentum can be maintained in times of austerity where other priorities may claim centre stage, this can be seen as the beginning of a fruitful journey where governments can appreciate the impact of their actions and work together to create a play-friendly Wales.

The key themes in our analysis highlight the complex ways in which all aspects of children's lives are interconnected; play is not a separate phenomenon that happens in designated spaces and prescribed times but is interwoven into children's everyday lives and will erupt whenever conditions allow. Policy development and implementation is a process influenced by historical and contemporary factors. In order to continue the momentum provided by the statutory requirement of the PSA, we suggest there is a need to develop an awareness of the conditions that support local authorities in this endeavour, and these might include:

*Maintaining dialogue:* The strategic partnerships that have been created or developed in response to the PSA requirement, both across local authority departments and with other partners in the voluntary sector, need to be fostered in order to continue the conversations that have taken place in the process of producing the data for the PSA. Dialogue acknowledges that there will be different understandings, different priorities and different levels of commitment to be navigated; within a shared desire to create a play friendly Wales, this agonistic dialogue requires strategic leadership and support both at local and national level, to encourage actors to take care of each other in order to care for children's environments.

*Fostering an on-going community of learning and practice:* The work to date has developed collective wisdom about conditions that support or constrain children's play. This wisdom is assembled not only from factual data but also through anecdote, intuition, memory, observation, experience and dialogue itself. Workforce development is an important element of this, both in terms of playwork training and qualifications and also in terms of continuous professional development that fosters a shared

understanding across professional and community sectors. Again, this requires strategic leadership at local and national level.

*Children's competence and adult responsibility towards a collective wisdom:* Most children have rich and situated knowledge about their environments and adults need to develop more nuanced and authentic approaches that recognise and value this alongside the myriad other ways of knowing. However, adults can never fully know about children's play, and nor should they. What is more relevant here is to develop wisdom regarding the micro, meso and macro levels practices that support or inhibit children's ability to take time and space for playing in and through their environments. However, children have a right to be separable, to have time and space to themselves that is beyond the gaze of adults and adults need to care for this. At the same time, children are not entirely separate or apart from adults; adults have a presence with children even when they are remote, and a mindful response pays attention to the ways in which these relationships may support or inhibit environmental conditions for play.

*Experimentation:* Wales is the first country in the world to introduce a Play Sufficiency Duty, so there is no blueprint to follow. Given what we know about the complex and situated nature of children's relationships with their environments, standard blueprints are neither achievable nor desirable, although there are general principles to be considered. The Welsh Government has taken a bold step of recognising that addressing sufficiency of play opportunities will require experimentation – not in the sense of scientific experiments that try to control all governing variables, but through critical examination of current habitual policies and practices and daring to do things differently.

There is a sense of excitement that the PSA process has generated. This needs nurturing through supportive and collaborative networks, not always amicable and consensual (as in children's play itself) but with a shared commitment to create more just and democratic environments for children. There is a principle in playwork training that the process of developing collective wisdom within a community of practice of adults looking to support children's play should itself reflect some of the characteristics of playfulness: openness to novelty, a sense of curiosity and what might happen, a willingness to ask different kinds of questions – a 'what if...?' approach. We hope that the PSA process has opened up and can continue this possibility.

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## References

- <sup>1</sup> Deleuze, G. and Guattari, F. (1998) *A Thousand Plateaus: Capitalism and Schizophrenia*, trans. B. Massumi, London: Continuum Books.
- <sup>2</sup> Amin, A. (2006) The Good City, *Urban Studies*, 43(5/6): 1009–1023.



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The full research report is available upon request:  
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