



RCT Play Association is a regional Play Association whose work covers the areas of Rhondda Cynon Taf and Bridgend County Borough. RCT Play Association aims are to improve the standards and opportunities for play for children living in Rhondda Cynon Taf and Bridgend County Borough.

RCT Play Association welcomes the opportunity to comment in this public consultation period on the Proposed Children and Family (Wales) Measure to the National Assembly for Wales'.

In our response we will be focusing on Part 4 Miscellaneous and General Section 60. Local Authorities duties in respect of play opportunities for children.

Consultation Questions

1. *Is there a need for a proposed Measure to deliver the stated objectives of:*
 - *contributing to the eradication of child poverty;*
 - *making provision in relation to child minding and day care for children;*
 - *establishing integrated family support teams to provide services to families where there are children who need to be, or who are, looked after, and this is related to needs on the part of their adult carers (such as dependence on drugs and alcohol); and*
 - *making provision for play opportunities for children?*

Yes

In the Welsh Assembly Governments Play Policy 2002 a commitment was made 'to ensure that all children have access to rich stimulating environments' and to encourage the creation of high quality 'compensatory' play provision that is appropriate, local, stimulating and challenging for all children in Wales.'

Play provision is not always seen as a priority within Local Authorities and the benefits to children's health and well-being are not recognised. In recent years many of the play spaces children have used have been lost to housing developments or busy roads have been built in between children's houses and those spaces. There is also a lot of fear around letting your child out to play because of the media hype of a few high profile cases. Now more than ever there is a greater need for staffed play provision for the Welsh Assembly Governments commitments made in the Play Policy 2002 to become a reality.

2. *How will the proposed Measure change what organisations do currently and what impact will any such changes have?*

We hope that the proposed measure will ensure that there is more effective use of resources in regard to Children's play particularly from within Local Authority Budgets.

Play is a cross cutting theme across a number of service areas and we hope this proposed measure goes some way to putting play at a strategic level across service areas such as health, education, highways and planning.



Play space is another important factor, providing the permission for children to use space in their local communities. This doesn't take a large investment it takes an attitudinal change amongst society.

In the proposed measure the duty for 'a local authority to secure sufficient play opportunities...' should provide support and guidance to local authorities to ensure that sufficiency incorporates quality and quantity.

3. *Are the sections of the proposed Measure appropriate in terms of achieving the stated objectives?*

In considering this question, consultees may wish to consider the nature of the provisions in the proposed Measure that:

- (a) *contribute to the eradication of child poverty (sections 1-12), particularly in relation to:*
 - *the broad aims for eradicating child poverty and preparation of strategies (sections 1-5)*
 - *services to tackle child poverty (sections 6-9).*

- (b) *make provision in relation to child minding and day care for children (sections 13-48), particularly in relation to:*
 - *registration provisions (sections 13-27);*
 - *emergency protection provisions (sections 28-29);*
 - *safeguards and disqualification provisions (sections 30-33);*
 - *inspection provisions (section 34-35);*
 - *offences and penalty provisions (sections 38-43).*

- (c) *establish integrated family support teams (sections 49-58), particularly in relation to:*
 - *teams (sections 49-52);*
 - *boards (sections 53-54);*
 - *annual reports (section 56).*

- (d) *secure sufficient play opportunities for children (section 60); and*

- (e) *ensure participation of children in local authority decision making (section 61).*

In respect of 3(d)(section 60):

We agree that assessing the sufficiency of play opportunities is the most strategic starting point and these sufficiency audits should be based on both quantity and quality of provision.

Therefore supplementary guidance and standards will need to be produced for local authorities that incorporate current play theory and best practice.

The inclusion of Section (60) paragraph (6) "play" includes any recreational activity" has the potential for negative consequences for the play sector. "Recreation" can be defined as sport, caravanning shopping etc. It would not be useful for the inclusion of recreation within



the proposed measure, as local authorities will argue that it can satisfy sufficiency by providing for recreational activities rather than play. The Welsh Assembly Government defines play as 'Children's behaviour, which is freely chosen, personally directed and intrinsically motivated.' We would like to see the same definition used in regard of the proposed measure.

4. *What are the potential barriers to implementing the provisions of the proposed Measure (if any) and does the proposed Measure take account of them?*

For example, is there capacity to implement the new duties in the proposed Measure through the existing programmes of Cymorth and Flying Start, and to undertake the work of the new Integrated Family Support Teams?

In order for the proposed measure to be implemented effectively thorough supplementary guidance and standards for play provision will be required. It is important that sufficiency of play opportunities builds on the Welsh Assembly Governments Play Policy 2002 and Play Policy Implementation Plan 2006 and that it starts to address the commitments the Welsh Assembly Government made such as to ensure that all children have access to rich stimulating environments' and to encourage the creation of high quality 'compensatory' play provision that is appropriate, local, stimulating and challenging for all children in Wales.'

5. *What are the financial implications of the proposed Measure for organisations, if any? In answering this question you may wish to consider Section 2 of the Explanatory Memorandum (the Regulatory Impact Assessment), which estimates the costs and benefits of implementation of the proposed Measure.*

We would predict that play sufficiency audits carried out by local authorities would evidence that current play provision is insufficient. In order to meet the sufficiency requirements extra resources would be needed. It would also be an ideal time to refocus the provision provided by the sector and local authorities to ensure it meets the newly identified priorities. It may be predicted that there will be an increased demand on regional play associations to support the implementation of the proposed measure and the increase in information and support to other organisations. This may require future investment to ensure the increased capacity is achievable and sustainable.

6. *Are there any other comments you wish to make about specific sections of the proposed Measure?*

We welcome the commitment the Welsh Assembly Government is placing on the Childs Right to Play as stated in the UNCRC Article 31 and commend the Welsh Assembly Government for identifying poverty of play experiences as a vital factor in tackling child poverty.