



CYPCommittee@wales.gov.uk

Inquiry into Childhood Obesity

Play Wales is the national charity for children's play. We work to raise awareness of children and young people's need and right to play and to promote good practice at every level of decision making and in every place where children might play.

We are the charity that provides advice, support and guidance for all those in Wales who have a concern or responsibility for any environment where children and young people might play. We uphold children's right to play. Freely chosen play is critically important in the healthy development of all children and young people. All children are entitled to quality play provision within their communities and we work strategically to achieve this goal on their behalf.

Although there are limited longitudinal studies assessing the longer term impact of play for health, there is evidence that playing is central to children's physical, mental, social and emotional health and wellbeing¹ and play is enshrined in the United Nations Convention on the Rights of the Child. Through play, children develop resilience and flexibility, contributing to physical and emotional wellbeing.

For children themselves, playing is one of the most important aspects of their lives.^{2,3} they value time, freedom and quality places to play. Consultations with children and young people show that they prefer to play outdoors away from adult supervision – in safe but stimulating places. In this situation children tend to be physically active and stretch themselves both physically and emotionally to a greater extent than they would if they were supervised.⁴

Play Wales welcomes the opportunity to respond to this call for evidence. The response is set out against the points that have the most relevance for playing children.

Health related programmes

Play Wales advises that the Change 4 Life resources be enhanced with the addition of 'Play 4 Life' materials. Several years ago, we worked with Welsh Government officials to contextualise the English Play 4 Life materials for use Wales. Although that work has not progressed, we are hoping that this may be added to the Change 4 Life website in the future. We would welcome the opportunity to support this development again.

Cross cutting programmes

Healthy School Initiative

We recommend that this initiative can better support children's play and better health outcomes for children by providing more time, space and permission for play which is freely chosen by children, rather than through the provision of highly structured adult led activity, which often fails to meet the needs of children and young people less likely to experience healthy lifestyles. Healthy school co-ordinators can ensure play is set within the Healthy School approach by:

One day Wales will be a place where we recognise and provide for every child's play needs

Un dydd bydd Cymru'n wlad ble y byddwn yn cydnabod ac yn darparu ar gyfer anghenion chwarae pob plentyn

National Office
Baltic House
Mount Stuart Square
Cardiff
CF10 5FH

Swyddfa Cenedlaethol
Tŷ Baltig
Sqwâr Mount Stuart
Caerdydd
CF10 5FH

Tel (029) 2048 6050
Cymraeg (029) 2043 6927
Fax (029) 2048 9359

mail@playwales.org.uk
post@chwaraecymru.org.uk

www.playwales.org.uk
www.chwaraecymru.org.uk

Registered charity No. / Elusen
Cofrestredig Rhif. 1068926

A company limited by guarantee
registered in Wales, No. / Cwmni
Cyfyngedig drwy warrant
cofrestrwyd yng Nghymru, Rhif.
3507258



Llywodraeth Cymru
Welsh Government

- Advocating for well-designed playable space when capital improvements are being made.
- Ensuring that play time is protected. The withdrawal of play time is often used as punishment. School play times are as important to children as break times are to school staff. Like adults, school play time is part of children's 'work/life balance'. Although not all children play vigorously at playtimes, it does provide the opportunity for children to be active in the mode of their choosing and to practice movement and motor skills.
- Advocating against school play times being shortened.
- Advocating that adequate time is given for both lunch and play time in order to support healthy eating patterns (children tell us that they often rush eating their lunch at school to have more time to play. *'People will chuck their lunch away so they have more time to play and other people sneak out of the canteen', 'You have to rush or leave and you waste your lunch. If you don't eat it fast then you get a detention.'*)⁵
- Advocating for the use of school grounds out of teaching hours to provide space for children to play freely in their own communities. Play Wales is currently producing a toolkit⁶ to support school communities to identify the scope for this provision locally.

Even minor movement during play and lunchtime counterbalances sedentary time at school and during out of school hours and helps the child achieve the recommended guidelines on physical activity as set out in Start Active, Stay Active.⁷ Play Wales produced a paper for Welsh Government's task and finish group on schools and physical activity. The paper is attached as Appendix 1.

Creating an Active Wales

Play Wales was pleased to be part of an external stakeholder group which supported the development of *Creating an Active Wales*, the national physical activity plan. We sat on the former Physical Activity Ministerial Advisory Group (PAMAG) which provided expert advice to the then Minister for Heritage to help ensure the effective implementation of *Creating an Active Wales*. In addition, we attended and were active members of other working groups which supported the implementation of the plan. To support the understanding of high quality play amongst members of the group, Play Wales produced a paper which outlined guidelines and support documents. The paper is attached as Appendix 2; however, it should be noted that it is not current (it was produced in March 2012) in terms of Health and Safety or the Children and Families (Wales) Measure. We provide a brief update regarding Health and Safety later in this evidence. We would be happy to provide more specific information upon request.

Commitments with regards to playing in the *Creating an Active Wales* plan include access to high quality play that is physically active and focus on the sufficient provision of play areas for children by local authorities under Section 11 of the Children and Families (Wales) Measure⁸, which places a duty on local authorities to assess and secure sufficient play opportunities for children in their area.

The Statutory Guidance to Local Authorities on assessing for sufficient play opportunities for children in their areas⁹ recognises that providing for play is an important tool or method in achieving other agendas, such as Healthy Living and wellbeing. Play Wales welcomes the inclusion (within the Statutory Guidance) of a

description of a quality play provision. This will support local authorities, providers and parents and communities to better understand playing.

The deadline for the completion of Assessments and Action Plans was 1 March 2013. We understand that the Welsh Government will consider these before the second part of the Duty, which is to secure sufficient play opportunities, is commenced.

Due to the innovative nature of and the international interest in the legislation, Play Wales, in partnership with The University of Gloucestershire, has funded research into Local Authority responses to the Play Sufficiency Assessments. The research findings will be available in mid May.

Early indications from Local Authorities and their partners suggest that the duty to undertake Play Sufficiency Assessments has:

- Raised the profile of play locally
- Allowed for the identification of linkage of local plans (such as Road Safety plans and local Creating an Active Wales plans) to play strategies
- Forged stronger departmental links between local government officers.¹⁰

Play Wales advises that it is vital that Part 2 of the duty is commenced in a timely fashion in order to maintain the momentum in terms of recognising children's play at local authority level.

Conclusion

Recent increases in childhood obesity have dominated interests in children's health. It is generally recognised that there are a range of factors which have been identified as underpinning the obesity figures. Technology-driven leisure activities, the availability and consumption of food and drink with high calorific content, parental and community ideas of safe spaces and activity and decreasing levels of active and independent travel all impact on energy expenditure.

To address these issues, Play Wales has continued to advocate for the provision of quality play opportunities for children in their own communities. This has included advocating and supporting the development of both quality staffed provision and quality spaces and places for playing, particularly in the public realm. We have produced a range of resources¹¹ to support those who plan for and provide children's play services and provision.

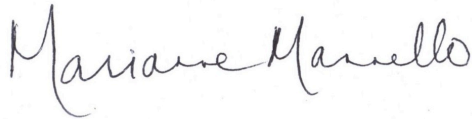
Health and safety laws and regulations can be used as a reason why certain play and leisure activities undertaken by children and young people are stopped or discouraged. The reasons for this misunderstanding are many and varied. In terms of Health and Safety, Play Wales has, as members of the Play Safety Forum¹² collaborated with the Health and Safety Executive (HSE) to develop and published a joint High Level Statement on play.¹³ The Play Safety Forum is also soon to publish an updated Managing Risk in Play Provision: Implementation Guide. We are hopeful that the Welsh Government will adopt the guide and endorse its use and application at local level, as has the Northern Ireland Executive and the previous UK government.

Recent and current focus for responding to childhood obesity levels tends to lean towards the amount of exercise children take and their dietary habits. However, an article in Archives of Pediatric Adolescent Medicine¹⁴ concludes that attention should be given to ensuring that there are sufficient community resources to support children's play:

“we should enthusiastically promote it [free play] on its traditional merits—that play allows children to experience the joys of movement, creativity, and friendship. Though it seems urgent to emphasize that play improves energy balance, we may get further in obesity prevention by realizing that modern neurobiology supports grandmother’s conventional wisdom and that the brain will naturally reinforce behaviors that make it healthy.”

Please feel free to contact Play Wales should you have any queries regarding our comments.

Kind regards,



Marianne Mannello
Assistant Director

¹Lester, S. and Russell, W. (2008) *Play for a Change: Play, policy and practice - a review of contemporary perspectives*, London: National Children’s Bureau

² Funky Dragon (2007) *Why Do People’s Ages Go Up Not Down?* Swansea: Funky Dragon

³ National Assembly for Wales (2010) *National Assembly for Wales Children and Young People’s Committee Provision of Safe Places to Play and Hang Out*

⁴ Mackett, R. *et al* (2007) ‘Children’s independent movement in the local environment’, *Built Environment*, 33, 4,454-68

⁵ Kapasi and Gleave (2009) *Because it’s freedom: Children’s views on their time to play*, Published for Play England by NCB

⁶ <http://www.playwales.org.uk/eng/schools>

⁷ Department of Health (2011) *Start Active, Stay Active: A report on physical activity for health from the four home countries’ Chief Medical Officers*

⁸ <http://www.assemblywales.org/bus-home/bus-legislation/bus-leg-measures/business-legislation-measures-cf.htm> (Accessed April 2013)

⁹ Welsh Government (2012) *Creating a Play Friendly Wales – Statutory Guidance to Local Authorities on assessing for sufficient play opportunities for children in their areas*

¹⁰ (January 2013) All Wales Strategic Play Network workshop exploring the NGO reporting process

¹¹ <http://www.playwales.org.uk/eng/information sheets>

¹² The UK Play Safety Forum is an independent forum of national organisations which focus on discussion and policy development in tow key areas:

- defining the role of risk and change in play provision
- advising on policy in relation to risk and safety in places where children play

Play Wales is a member of the forum, along with Association of Play Industries, Child Accident Prevention Trust, Fields in Trust, Play England, Play Scotland, PlayBoard Northern Ireland and Royal Society for the Protection of Accidents (ROSPA).

¹³ Health and Safety Executive (2012) *Children’s play and leisure: promoting a balanced approach*

¹⁴ Burdette, H. L. & Whitaker, R.C. (2005). Resurrecting free play in young children: Looking beyond fitness and fatness to attention, affiliation, and affect, *Archives of Pediatric Adolescent Medicine/Vol 159*, Jan 2005: 46-50 in Lester, S. and Russell, W. (2008) *Play for a Change: Play, policy and practice - a review of contemporary perspectives*, London: National Children’s Bureau



Appendix 1

Play in Schools

April 2013



Key points

- *Playing is central to children's physical, mental, social and emotional health and wellbeing¹ and is enshrined in the United Nations Convention on the Rights of the Child. Through play, children develop resilience and flexibility, contributing to physical and emotional wellbeing.*
- *For children themselves, playing is one of the most important aspects of their lives.²*
- *Schools often offer ideal space for children to play and interact with one another. It is important to develop a strong play element in order to provide a healthy school environment.*

Supporting play – the role of schools

The school day should allow time and space for children to relax and play freely with their friends. Children spend a reasonable amount of time in school; therefore the space should be designed to be inclusive and flexible. Children tell us that playtimes are the most important part of the school day to them. Many children also tell us that at school is the main opportunity they have to spend time playing with their friends. Parents also report that play in school is important.³

For the purposes of this paper we have categorised the time children spend in school under three primary headings. They are the:

- planned, structured curriculum part of the day
- non-curriculum part of the school day (playtimes and lunchtimes)
- out of school hours.

In the planned curriculum part of the day, play, from the teachers perspective, has identifiable learning outcomes. To achieve identified outcomes, the play may be structured, directed and assessed by the teacher. Teachers guide or direct the play to help the child to develop knowledge across the curriculum. Play Wales has developed suggestions for ways that play could be incorporated into various areas of the curriculum: www.playwales.org.uk/eng/schools

Children's play and lunchtimes form the non-curriculum part of the day; when play is freely chosen by the child and in the child's control. School landscape design, playground design and good use of indoor space for playing during severely inclement weather presents an opportunity to improve the quality of playtimes both for pupils and staff. Providing time and space for free play time during playtimes supports positive benefits such as:

- a reduction in violent behaviour in the school playground
- the provision of positive social experiences for children
- increased attention and activity in the classroom.⁴

While learning through play is enshrined in the early years curriculum, there is growing evidence that it is being severely squeezed elsewhere. Queries from parents and children to Play Wales have indicated a trend toward reducing playtimes to accommodate additional time for academic subjects in addition to its withdrawal as a punishment or for behavioural reasons.

Benefits of free play at playtime

Playtimes represent an essential, planned break from rigorous cognitive tasks. It affords a time to rest, play, imagine, think, move, and socialise.

Although not all children play vigorously at playtimes, it does provide the opportunity for children to be active in the mode of their choosing and to practice movement and motor skills. Even minor movement during play and lunchtime counterbalances sedentary time at school and at home and helps the child achieve the recommended guidelines on physical activity set out in 'Start Active, Stay Active'.⁵

Playworkers across Wales are forging better relationships with local schools by supporting the non-curriculum part of the school day, by facilitating local models of the Scrapstore PlayPod®.⁶

Play organisations are supporting schools to undertake playground audits of the existing play space. Many provide training for lunchtime supervisors to support them to better understand a wide range of play opportunities. They provide information and advice specific to supporting play at play and lunchtimes.

The playworkers source appropriate clean and safe scrap, such as nets, cardboard and tubes, that is suitable for children's play and is collected from businesses and manufacturers. The playworkers may help the school to identify and provide a purpose built structure suitable for playgrounds to store the scrap and other play equipment. The playtime staff and lunchtime supervisors oversee the opening of the structure and support children to access the resources and return them when playtime finishes.

Welsh play organisations report that schools have identified a range of benefits to transforming playtime, such as:

- Happier children
- Significantly fewer incidents and accidents
- Children returning to class ready to learn
- Empowered lunchtime staff
- Positive parental responses

Use of school grounds for play during out of learning hours

Existing school facilities, in most cases, offer significant opportunities to satisfy not only the learning needs of all learners, but many of the social and recreational needs for the community. In many areas, both urban and rural, school grounds offer neutral space in the local community. Having access to such a space can enhance the opportunities that all parts of the community around the school have for outdoor recreation and play. Both schools and communities can be enriched when they engage with each other more fully.

Providing play opportunities within school grounds will be a challenge. Some schools and communities may encounter more challenges than others. Every school is individual, and is ideally placed to be sensitive to the needs of its particular community. To support schools Play Wales (working with a focus group of head teachers from across Wales) is developing a toolkit to support the use of school grounds for children to play out of school hours.

Key recommendations to support play in schools

- Play and lunchtimes are necessary breaks in the day for optimising a child's social, emotional, physical, and cognitive development. They should not be shortened or withheld as a punishment or for behavioural reasons.
- Outdoor play spaces should provide wide-ranging opportunities for all children of varying ages. They should offer a rich play environment as described by Welsh Government.⁷
- Schools should be signposted to Play Wales' toolkit for use of school grounds to help identify the scope for this provision locally.
- Schools should consider providing drying rooms for wet clothing and shoes.
- Providing suitable indoor spaces for playing in periods of severe inclement weather.
- All staff should be supported, and if necessary, be provided with training in order that the value of free play is understood, supported and promoted.
- Schools should be encouraged to adopt a play policy, which states the value that the school places on children's play and commits itself to supporting play opportunities. It also supports staff in the planned, structured, curriculum part of the school day to use professional judgement to meet the requirements of the curriculum through play and to intervene sensitively to maximise learning potential. A sample school play policy can be found at:
www.playwales.org.uk/eng/schoolplaypolicy

¹ Lester, S. and Russell, W. (2008) *Play for a Change: Play, policy and practice - a review of contemporary perspectives*, London: National Children's Bureau

² Funky Dragon (2007) *Why Do People's Ages Go Up Not Down?* Swansea: Funky Dragon

³ www.playday.org.uk/playday_campaigns/2009_make_time/2009_research.aspx

⁴ Barros, R, Silver, E and Stein, R (2009) 'School recess and group classroom behaviour', *Pediatrics*, 123, 2, 431–36

Pellegrini, A. D. and Bohn, C. (2005) 'The role of recess in children's cognitive performance and school adjustment', *Research News and Comment*, AERA, Jan/Feb 2005, 13–19

Pellegrini, A. (2009) *The role of play in human development*. Oxford: Oxford University Press

⁵ 2011 *Start active, stay active: a report on physical activity from the four home countries' Chief Medical Officers*

⁶ www.youtube.com/watch?v=nqi1KyJJeKg

⁷ Welsh Government (2012) *Creating a Play Friendly Wales – Statutory Guidance to Local Authorities on assessing for sufficient play opportunities for children in their areas*, Welsh Government: Cardiff

www.playwales.org.uk/eng/richplayenvironment

www.playwales.org.uk

Registered Charity/Elusen Gofrestredig: 1068926

Company Limited by Guarantee/Cwmni Cyfyngedig trwy Warant: 3507258

Registered in Wales/Cofrestrwyd yng Nghymru



Appendix 2

Environments for Playing March 2012

Introduction

Creating an Active Wales notes that access to a variety of environments for play contribute to an environment that will encourage people to be more active.

The purpose of this paper is to advise the group of current policy issues and resources that support a more innovative approach to providing environments for play.

Background

To children themselves, playing is one of the most important aspects of their lives¹ – they value time, freedom and quality places to play. Consultations with children and young people show that they prefer to play outdoors away from adult supervision – in safe but stimulating places. In this situation children tend to be physically active and stretch themselves both physically and emotionally to a greater extent than they would if they were supervised.²

Most children will play without the need for adult intervention, even in the most barren of environments, but an environment rich in possibilities supports their play best of all.

A rich play environment is:

- a varied and interesting physical environment that maximises the potential for socialising, creativity, resourcefulness and challenge.
- a place where children feel free to play in their own way, on their own terms.

Quality play environments offer a variety of opportunities:

- **challenge and uncertainty** – both on a physical and emotional level
- **loose parts** – natural and man made materials that can be manipulated, moved and adapted, built and demolished
- **movement** – running, jumping, climbing, balancing, rolling
- **other children and young people** – with a choice to play alone or with others, to negotiate, co-operate, fall out, and resolve conflict
- **rough and tumble** – play fighting
- **the natural world** – weather, trees, plants, insects, animals, mud and the four elements
- **the senses** – sounds, tastes, textures, smells and sights.

Active play is the most common type of physical activity that children take part in outside school, and unstructured play may be one of the best forms of physical activity for children.³

- Prolonged and wide-ranging exercise develops stamina (informal sports, chase games, climbing, building). Research suggests that children can gain more physical exercise in regular informal play than in a weekly sports activity.⁴
- Climbing develops strength, co-ordination and balance, while jumping contributes to bone density.
- When children repeat an action as part of their play they are often in the process of calibrating – learning to manage growing bodies – as well as developing agility, co-ordination and confidence.

Policy context

A section on Play Opportunities is included in the Children and Families (Wales) Measure 2010. Section 11 of the Measure allows Welsh Ministers to place a duty on Local Authorities to assess for and with regard to that assessment secure sufficient play opportunities in their areas for children, so far as reasonably practicable.

The Deputy Minister for Children and Social Services will commence this duty in two parts.

Part 1 will be the commencement of section 11(1), which will place a duty on each local authority to assess the sufficiency of play opportunities in its area for children in accordance with regulations; and section 11(2) which will set out the detail of the regulations. These will detail the requirements for the assessments and the date by which they must be completed.

The assessments should cover the range of factors that affect children and young people's opportunities to play and include demographic profiles of the area; an audit of open space and existing and potential play space; play provision; recreational provision and other factors that promote play opportunities including planning; traffic; transport; community initiatives, as well as workforce development. The sufficiency of provision and opportunities will be assessed against criteria set out in the Statutory Guidance, which will include consultation with children and young people.

The Foundation Phase

The Foundation Phase is a play-based curriculum for 3 to 7-year-olds that provides children with the opportunity to learn through active involvement both in the indoor and outdoor learning environment. The Foundation Phase encourages children to enjoy physical activity whilst developing their gross and fine motor skills, awareness of space and the use of large and small equipment across all Areas of Learning. *An evaluation of the implementation of the Foundation Phase for five to six years old in primary school*, produced by Estyn says the 'Foundation Phase is having a positive impact on the wellbeing of children'. The inspectorate found that 'generally, children are more engaged and eager to learn, particularly the boys, who are benefitting from more active learning including greater use of the outdoors.'

Tobacco Control Action Plan for Wales

Launched in February 2012, this plan supports one of the key themes of Our Healthy Future, which is the need to further reduce the number of people who smoke and are exposed to second-hand smoke in Wales. The action plan encourages public bodies, such as local authorities, to adopt an exemplar role in action to discourage smoking, particularly in areas where children are likely to congregate, such as school grounds and play grounds. Ceredigion and Powys councils ban smoking at playgrounds.

Designing for Play-Tools and Resources

Technical Advice Note (TAN) 16: Sport, Recreation and Open Space (2009)

Local planning authorities are expected to refer to the standards recommended by the Welsh Government's Technical Advice Note (TAN 16). TAN 16 provides advice for communities, developers and local planning authorities preparing local development plans and taking decisions about planning applications. The

Note contains advice about spaces for children's and young people's play:

"It is vital that children and young people, including those who are disabled, can access areas which provide safe opportunities to play. Whilst formal, equipped areas provide opportunities, these are not the only forms of provision which should be offered. Wheeled play areas, ball game areas, 'playable space' and informal areas for 'environmental play' can provide opportunities for children to interact and gain the social, health and well-being benefits which come from opportunities for active, physical play."

Play Wales is currently undertaking the State of Play 2011, a Wales wide review which focuses on the planning and funding of provision to meet children's play needs. Early returns suggest that the development of 'playable spaces' is included in a small number local Open Space Assessments.

Design for Play: A guide to creating successful play spaces

This guide explains how good play spaces can give children and young people the freedom to play creatively, while allowing them to experience risk, challenge and excitement. There is also advice on how

play spaces can be affordably maintained. It sets out a new approach, tackles some current myths, and challenges providers to think more laterally and creatively about children and young people. It helps those involved in commissioning and designing play spaces to put play value at the heart of their work.

Nature play: Maintenance guide

This guide is aimed at those responsible for developing, delivering and maintaining innovative natural play spaces within parks and similar spaces. It supports those who want to introduce nature play into their play spaces, and does it according to the design principles outlined in *Design for Play*. The guide also highlights the need for commissioners and designers to consider the management and maintenance implications at the start and throughout the development of a new play space. It helps identify procedures for the ongoing maintenance of these play areas, ensuring that consideration is given to ongoing revenue funding for maintenance, repairs or replacement.

How Play Wales is using the guides locally

- The Tri-county Play Association received funding from the Heads of the Valleys Programme in September 2010 to conduct a project that seeks to design and build natural playable spaces across the region. The project will create natural play spaces that are rich in play opportunities for children and teenagers, providing a wide range of play experiences that are accessible to disabled and non-disabled children and provide for the needs of the local community.

Play Wales, is currently contracted to co-ordinate this project, which will result in new spaces in Sirhowy Woodlands (Blaenau Gwent) and Maerdy Community Primary School (RCT). The project is based on the principles in the above guides and on *Managing Risk in Play Provision: Implementation Guide*.

- Play Wales is working with the Community Foundation in Wales and the Fair Share Panel on Ynys Môn to “enable equal opportunity access for children and young people of all abilities to experience play and physical activity within their own communities. The responsibility for play space development and management is largely devolved to community councils or local play associations.

Play Wales has been funded to develop a community toolkit that fills a gap in support for groups that manage play areas in the County, in order to ensure the development of quality play spaces that are accessible.

‘Developing and Managing Play Spaces’ is intended to provide a single source of support and signposting for community groups to navigate some of the challenges of managing or developing a play space.

Managing Risk in Play Provision

The *Managing Risk in Play Provision: Implementation Guide* was produced by the Play Safety Forum¹ to give specific guidance to practitioners who manage, design and maintain unstaffed public play areas.

The guide shows how those responsible for play provision can develop an approach to risk management that takes into account the benefits the provision offers to children and young people as well as the risks.

The guide, which is endorsed by the Health and Safety Executive (HSE), was produced by the former UK Government is being amended by the current administration. The Northern Ireland Executive has adopted the Guide. Play Wales is engaging with officials in Children and Young People's Strategy Division (Department for Health, Social Services and Children) in order to explore the Guide's adoption by Welsh Government.

Common Sense, Common Safety

Common Sense Common Safety (A report by Lord Young of Graffham to the Prime Minister following a Whitehall-wide review of the operation of health and safety laws and the growth of the compensation culture) states:

"A further area of concern is the impact of health and safety on children's play areas. In legal terms, play

provision is guided by the Health and Safety at Work Act. There is a widely held belief within the play sector that misinterpretations of the Act are leading to the creation of uninspiring play spaces that do not enable children to experience risk. Such play is vital for a child's development and should not be sacrificed to the cause of overzealous and disproportionate risk assessments.

The report advises that with regard to children's play we should shift from a system of risk assessment to a system of risk-benefit assessment, where potential positive impacts are weighed against potential risk. Furthermore, it advises that Government consider reviewing the Health and Safety at Work Act to separate out play and leisure from workplace contexts.

Engagement with HSE

In response to Lord Young's recommendation to Shift from a system of risk assessment to a system of risk-benefit assessment and consider reviewing the Health and Safety at Work Act to separate out play and leisure from workplace contexts a workshop was held with HSE, Play Safety Forum and others to consider the proposal and discuss the development of a high-level statement. This High Level Statement will help clarify the Law's operation and the expectations of HSE.

Issues for consideration:

- PAMAG members should remain cognisant of developments within HSE, particularly regarding the high level statement which will clarify how health and safety law will be applied to the operational circumstances of children's play provision
- PAMAG members should promote the risk-benefit approach as an approach that satisfies the legal requirement for 'suitable and sufficient risk assessment'
- PAMAG members involved in play space design, commissioning and management, or those who fund such, should expect new and play area refurbishment projects to refer to the design principles as outlined in '*Design for Play*', '*Managing Risk in Play Provision*' and '*Nature play: Maintenance Guide*'.

¹ (2007) *Why do people's ages go up not down?* Funky Dragon: Swansea

² Mackett, R and others (2007) 'Children's independent movement in the local environment', *Built Environment*, 33, 4,454-68

³ British Heart Foundation (2009) *Couch Kids: The nations future*. London

⁴ Mackett, R. (2004) *Making Children's Lives More Active*. University College London: London

^v The UK Play Safety Forum is an independent forum of national organisations which focus on discussion and policy development in tow key areas:

- defining the role of risk and change in play provision
- advising on policy in relation to risk and safety in places where children play

Play Wales is a member of the forum, along with Association of Play Industries, Child Accident Prevention Trust, Fields in Trust, Play England, Play Scotland, PlayBoard Northern Ireland and Royal Society for the Protection of Accidents (ROSPA).