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**Fair Play: A consultation on the play
strategy
Department for Children, Schools and
Families
Department for Culture, Media and Sport**

**A response from the National Council
for Voluntary Youth Services and the
National Council of Voluntary Child
Care Organisations**

July 2008

Introduction

1. The National Council for Voluntary Youth Services (NCVYS) and the National Council of Voluntary Child Care Organisations (NCVCCO) are pleased to have the opportunity to submit a joint response to the Department for Children, Schools and Families (DCSF) and Department for Culture, Media and Sport (DCMS) *Fair Play: A consultation on the play strategy*.

2. As umbrella organisations representing voluntary and community organisations that work with children, young people and families, NCVYS and NCVCCO are in a unique position to comment on the Statutory Guidance. Our collective membership encompasses around 300 organisations working with children and young people, ranging from large national service providers to small community-based organisations.
3. For more information on any element of this paper, please contact NCVYS's Policy Officer, Hannah Dobbin on 020 7278 1041 or NCVCCO's Director of Policy and Communication Joe Levenson on 020 7833 3319.

Key comments

4. NCVYS and NCVCCO broadly welcome *Fair Play: A consultation on the play strategy* and its focus on play for all. It is essential that, although a great deal of resources and support is going to the most disadvantaged areas, children and young people in all areas have safe access to play facilities and spaces. It is also essential that a holistic approach is taken throughout government so that policymaking in other areas, such as planning or transport, does not have unintended consequences for play.
5. NCVYS and NCVCCO propose the following recommendations:

Recommendation 1: Existing and new play facilities and spaces should be inclusive and accessible to all children and young people.

Recommendation 2: Sure Start Children's Centres to develop links with local VCS organisations to ensure that parents are informed about all good local play areas and facilities.

Recommendation 3: Local Authorities (LAs) should utilise voluntary and community sector (VCS) skills, knowledge and contacts to facilitate community and young people's involvement in places to play.

Recommendation 4: LAs and the VCS to work together to provide play opportunities through the extended schools programme.

Recommendation 5: DCSF and LAs to work with, and support, the VCS to learn from its experience and knowledge of providing safe places to play.

Recommendation 6: Government to adopt a joined-up approach to challenging negative perceptions of children and young people.

Recommendation 7: Government to support the *Playwork Principles* which establish the professional and ethical framework for playwork.

Recommendation 8: Government to continue to support and fund developments in the play workforce, recognising the links between youth work and playwork and encouraging sector mobility.

Recommendation 9: Government to work with the VCS to build on current good practice around volunteering and play.

Recommendation 10: Primary Care Trusts and health groups to work with the VCS to disseminate information about the benefits of play and ensure that children, young people and families are aware of the full range of play opportunities available.

Recommendation 11: Government to invest in capital funding to provide play facilities, but also demonstrate how revenue will be created to enable long-term, sustainable play opportunities for children and young people.

6. This response has been informed by consultation with NCVYS and NCVCCO member organisations, including St. John Ambulance and Mencap.

Play for all

7. All children and young people have the right to play, as enshrined in Article 31 of the UN Convention on the Rights of the Child¹. *Fair Play* recognises this and successfully considers children and young people from different backgrounds, ages and with different needs.
8. NCVYS and NCVCCO welcome government's commitment to transforming services for disabled children and their families. Successful implementation of the proposals within *Fair Play* will be crucial to providing disabled children and young people with play opportunities, particularly outdoors, in safe settings. However, it is important that disabled children and young people have access to generic play facilities to foster an inclusive play environment. This does not only apply to new facilities, existing play spaces can be adapted to allow all children and young people to benefit from play activities. This may involve small changes such as putting fences up around play areas to make them safer or building changing place toilets.
9. For young people there is a policy focus on positive activities for young people, as highlighted in *Aiming high for young people: a ten year strategy for positive activities*² and *The Children's Plan*³. Although play can be a route into more formal positive activities, the notion of play should not be lost in positive activities and young people should also be given the opportunity, facilities and support, to play in safe environments.
10. A focus on provision for older young people might also help combat problems of young people hanging around play areas designed for children. Access to positive activities, structured and non-structured, is key to engaging young people in both indoor and outdoor activities and encouraging play.
11. This is also pertinent to the development of family-orientated play space which can provide vital facilities for young people, 13-years-old and above, with learning disabilities.
12. Play England's (2007) *Charter for Children's Play*⁴ highlights that children sometimes need extra support to enjoy their right to play:

Children and young people living away from home or visiting unfamiliar or controlled environments such as hospital, prison, immigration centres, and residential homes and schools, sometimes experience fear, anxiety and discomfort. For these children it is especially important to ensure they have good play opportunities facilitated by trained staff and volunteers.
13. Another group of children and young people that may be excluded from play activities are those that have English as an additional language. This is particularly important when giving safety messages. Multi-lingual play workers, in areas where there is a need for facilitating communication, would be one way of ensuring that all children and young people can play. Play workers, with relevant skills, are also vital in assisting visually and hearing impaired children and young people access and enjoy play opportunities.

¹ Play England (2007) *Charter for Children's Play*. London, Play England.

² <http://www.everychildmatters.gov.uk/youthmatters/aiminghigh/>

³ <http://www.dfes.gov.uk/publications/childrensplan/index.shtml>

⁴ <http://www.playengland.org.uk/resources/charter-for-childrens-play.pdf>

Recommendation 1: Existing and new play facilities and spaces should be inclusive and accessible to all children and young people.

14. Investment in, and support for, early years provision is key to introducing and enabling children to play. The development of Sure Start Children's Centres as sources of information for parents on play provision is welcomed, especially as an opportunity to develop links with, and sign post parents to, voluntary and community sector (VCS) organisations that also provide play facilities and programmes.

Recommendation 2: Sure Start Children's Centres to develop links with local VCS organisations to ensure that parents are informed about all good local play areas and facilities.

Community and children and young people's involvement

15. The emphasis throughout *Fair Play* on children's stake in public spaces, particularly places to play, is very welcome. However, it is important that DCSF, LAs and others consider how to fully reflect this in developing the strategy and its proposals. In particular, children should be involved in determining local priorities and designing services from the outset, rather than having a limited range of options presented to them. While children are a key part of the community and should be consulted and engaged alongside other members of the community, consideration should be given to the most appropriate ways of engaging with them and ensuring their voice is heard. The VCS clearly has a strong track record of participation work with children and young people and this expertise should be harnessed to ensure that children do feel they have a stake in public spaces.

Recommendation 3: LAs should utilise VCS skills, knowledge and contacts to facilitate community and young people's involvement in places to play.

16. In May 2008, NCVYS, NCVCCO, YMCA England and The Foyer Federation held a joint seminar examining the role of children and young people in 'place shaping'. The view of children and young people about the local areas where they live and study formed a key part of the event, and eight films were commissioned to demonstrate these views and the extent to which children and young people felt able to influence decision making processes.
17. The event also highlighted the importance of considering the full range of issues that are important to children and young people, such as transport, positive activities, play spaces and a sense of belonging – this breadth should be reflected in the play strategy and proposals to engage with children and young people⁵.

Schools, the VCS and places to play

⁵ Further information, including a conference report and copies of the films made are available from NCVYS and NCVCCO. Contact details and websites are given at the end of this document.

18. *Fair Play* highlights schools as providers of play and the extended schools programme is an opportunity to increase access to play facilities. The VCS is also a key provider of activities for children and young people, often working in the most disadvantaged areas. However, some VCS organisations are finding it difficult to engage with the extended schools programme. LAs and the VCS need to be proactive and encourage better working to enable children and young people to fully benefit from activities out-of-school hours. LAs need to be aware of what the VCS can offer in their area and facilitate communication between schools and VCS organisations, especially the smaller ones.

Recommendation 4: LAs and the VCS to work together to provide play opportunities through the extended schools programme.

19. Although schools may provide the best local play facilities, alternative venues need to be accessible to children and young people. For children and young people who are not in formal education, the fact that the play space is in a school may deter them from going to that space. Investment in more places to play is welcomed, offering children and young people a choice of where to go.

Playing safely

20. As recognised in DCSF's *Staying Safe*⁶ document, fun does not come without risk and a balanced approach to risk management needs to be taken to ensure that children and young people benefit from stimulating developmental activities within a safe environment. The Play Safety Forum (2002)⁷ also states that 'children need and want to take risks when they play. Play provision aims to respond to these needs and wishes by offering children stimulating, challenging environments for exploring and developing their abilities'.
21. VCS organisations need appropriate support to assist them in keeping young people safe. NCVYS has developed Keeping it Safe, a good practice guide and Sound Systems⁸, a peer accreditation scheme aimed at voluntary youth organisations. Keeping it Safe has received endorsements from DCSF, the NSPCC and other key stakeholders and is a good example of how the VCS can lead the way in safeguarding work. Yet there seems to be unwillingness by funders to invest in this tried and tested scheme. NCVYS hopes that *Fair Play* will provide an opportunity for discussion with Ministers and officials on how NCVYS can play a role in working with youth organisations to ensure their practice is safe.

Recommendation 5: DCSF and LAs to work with, and support, the VCS to learn from its experience and knowledge of providing safe places to play.

22. Transport can often provide a barrier to children and young people accessing play opportunities. Enabling children and young people to feel safe on the way to and from play spaces is key to ensuring that the facilities on offer are used. Supporting the police, LAs and transport operators to tackle crime and anti-social behaviour on public transport will help, however focus also has to be on supporting community relations which can contribute to a safer environment to travel around in.

⁶ <http://www.everychildmatters.gov.uk/stayingsafe/>

⁷ Play Safety Forum (2002) *Managing risk in play provision: A position statement*. London, National Children's Bureau.

⁸ Further information on Keeping it Safe and Sound Systems can be found via <http://www.ncvys.org.uk/index.php?page=262>

23. In rural communities access to transport is often a problem, limited, infrequent bus routes can often mean that children and young people are not able to get to play spaces. In some areas the VCS is helping to tackle this problem by providing safe collection and drop-off points to transport children and young people. However this is only possible where resources allow.
24. In urban areas public transport or walking may not be seen as a safe option. Issues around territories, unlit streets and road safety may all be deterrents, for children, young people and their families to travel to access play spaces and facilities.
25. NCVYS and NCVCCO welcome the focus in *Fair Play* on tackling safe access to play and would encourage government to learn from good practice within the VCS. The VCS also provides opportunities to engage with young people on their views which can influence policymaking.
26. *Fair Play* highlights that DCSF are working with the Department for Transport around providing safe travel for children and young people. NCVYS and NCVCCO encourage this to continue, along with working with other government departments such as Communities and Local Government, to develop cross-government policies that tackle these issues.
27. Negative perceptions of children and young people, by both adults and other young people, can hinder engagement in play. There is a great deal of good practice currently going on, within the VCS and other sectors. For example St. John Ambulance works with approximately 21,500 young people and has many examples of the positive impact that its work has on local communities. However, good practice needs to be shared and promoted on a wider scale, often it circulates in channels that are preaching to the converted. Furthermore, unfortunately good work being done at a local level often gets overshadowed by national media coverage of negative stories about children and young people.
28. Negative perceptions of children and young people is part of a wider societal problem that needs to be recognised as a cross-government issue and must be tackled consistently by government departments. Contradictory messages around intervention, restorative justice and punishment from government departments do not aid work being done to challenge negative perceptions.

Recommendation 6: Government to adopt a joined-up approach to challenging negative perceptions of children and young people.

Play workforce

29. Play Wales issued the *Playwork Principles*⁹ that have been endorsed by SkillsActive, the Sector Skills Council for playwork and the Early Childhood Forum. NCVYS and NCVCCO also support the principles that include:
 - for playworkers, the play process takes precedence and playworkers act as advocates for play when engaging with adult-led agendas;
 - the role of the playworker is to support all children and young people in the creation of a space in which they can play;
 - the playworker's response to children and young people playing is based on a sound up-to-date knowledge of the play process and reflective practice;

⁹ Play Wales (2005) *Playwork principles*. Cardiff, Play Wales.

- playworkers recognise their own impact on the play space and also the impact of children and young people's play on the playworker; and
- playworkers choose an intervention style that enables children and young people to extend their play. All playworker intervention must balance risk with the developmental benefit and wellbeing of children.

Recommendation 7: Government to support the *Playwork Principles* which establish the professional and ethical framework for playwork.

30. *Building Brighter Futures: Next Steps for the Children's Workforce*¹⁰ highlighted significant investment and focus on the play workforce. NCVYS and NCVCCO welcome this support, in particular the development of the National Vocational Qualification Level 3 in Playwork. This will help to develop the workforce and create greater recognition of the skills involved in playwork.
31. NCVYS and NCVCCO also support the development of links between youth work and playwork, especially the discussion around a transitional unit which is being looked at by SkillsActive, the Sector Skills Council for Play, and Lifelong Learning UK. This will help facilitate sector mobility and create a better-skilled workforce.

Recommendation 8: Government to continue to support and fund developments in the play workforce, recognising the links between youth work and playwork and encouraging sector mobility.

32. The VCS and volunteers provide vital support children and young people to play safely and NCVYS and NCVCCO welcome recognition of this within *Fair Play*. The VCS plays an important role in providing challenging, but safe, learning environments for young people and VCS organisations can lead the way in delivering safe services for children and young people, working in partnership with schools and other providers in safeguarding.
33. NCVYS and NCVCCO are well placed, as membership organisations, to represent and engage the VCS in DCSF consultations, pathfinders and initiatives. Therefore, NCVYS and NCVCCO would welcome the opportunity to contribute to work around volunteering models and proposals for a national volunteering scheme.

Recommendation 9: Government to work with the VCS to build on current good practice around volunteering and play.

34. **It is essential that staff and volunteering involved in supervising play activities are fully equipped to carry out their role and are suitable to work with children. It will be especially important to ensure that the introduction of the Independent Safeguarding Authority and new vetting and barring arrangements meet those needs, without making it too difficult in practice to recruit staff and volunteers. NCVCCO and NCVYS are keen to work with the ISA and other government partners to ensure that the children and young people's voluntary and community sector is fully aware of new vetting and barring arrangements and well placed to adapt to the changes.**

¹⁰ <http://www.dfes.gov.uk/publications/childrensplan/downloads/7482-DCSF-WorkforceMatters.pdf>

Sustaining and embedding play

35. 'Play is an essential part of every child's life – vital to his or development... Play is essential for healthy physical and emotional growth, for intellectual and educational development, and for acquiring social and behavioural skills' (Play England, 2007). It is therefore essential that play is supported and embedded into national and local policy.
36. There are often problems in implementing national policies at a local level and it is encouraging that *Fair Play* recognises the importance of sustaining and embedding play at a local level. The test will be in implementing the national policies successfully locally. Introducing a play indicator and providing funding incentives will all help to achieve this.
37. As stated above play is essential for healthy physical and emotional growth so Primary Care Trusts (PCTs) and regional public health groups have a key role in disseminating information about play and promoting the benefits of play to children, young people and their families. Links between PCTs, health groups and local VCS organisations can ensure that children, young people and their families are made aware of the full range of play opportunities available.

Recommendation 10: PCTs and health groups to work with the VCS to disseminate information about the benefits of play and ensure that children, young people and families are aware of the full range of play opportunities available.

38. In order to make play sustainable, long-term funding and support need to be in place. *Fair Play* introduces a great deal of capital funding to provide places for children and young people to play, however it needs to be made clear where revenue will come from, enabling play providers, in particular small VCS organisations, to continue to provide positive and beneficial play services to children and young people.

Recommendation 11: Government to invest in capital funding to provide play facilities, but also demonstrate how revenue will be created to enable long-term, sustainable play opportunities for children and young people.

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