

Senedd Cymru  
Y Pwyllgor Plant, Pobl Ifanc ac Addysg

Ymchwiliad i effaith argyfwng Covid-19 ar blant  
a phobl ifanc yng Nghymru

COV 49  
Ymateb gan: Chwarae Cymru

Welsh Parliament  
Children, Young People and Education Committee

Inquiry into the impact of the Covid-19 outbreak on  
children and young people in Wales

COV 49  
Response from: Play Wales



**National Assembly for Wales' Children, Young People and Education Committee's consultation exploring how the outbreak of COVID-19 is affecting all aspects of life for children and young people:**

CONSULTATION RESPONSE

Please note: we have endeavoured to ensure the following paper has accurately reflected the circumstances at the time of writing: 11 May 2020

1.1 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 worked closely with Welsh Government on its groundbreaking 'Play Sufficiency' legislation. Section 11 of the Children and Families (Wales) Measure 2010<sup>1</sup> places a duty on local authorities to assess and secure sufficient play opportunities for children in their area.

1.2 In the current crisis, there is a necessary focus on work, shopping and exercise as essential activities. For children, there has also been an emphasis on continuing their education, as far as possible.

1.3 Playing must also be seen as essential activity. Playing is the most natural and enjoyable way for children to be active, keep well and be happy. It is fundamental to children's well-being and healthy development as articulated in Welsh Government's Play Policy.<sup>2</sup>

1.4 Play Wales is pleased to have an opportunity to input into the consultation exploring the impact of COVID-19 on children. From our

<sup>1</sup> <http://www.legislation.gov.uk/mwa/2010/1/contents>

<sup>2</sup> <https://www.playwales.org.uk/login/uploaded/documents/Play%20Policy/Wales%20play-policy-e.pdf>

engagement with our membership and other stakeholders, we have identified some issues of concern.

## **Information for parents**

1.5 Since the outbreak of the current crisis we have been disappointed that Welsh Government did not share our resources for children and their play as comprehensively as we had hoped.

1.6 The *Stay Safe. Stay Learning: continuity of learning policy statement*<sup>3</sup> was issued on 20 April 2020. In the statement, Welsh Government commits itself to targeting support and action at all levels of the education system and will provide a range of guidance and support. The list includes guidance for parents in supporting children's health and well-being and their learning at home.

1.7 As part of the Stay Safe, Stay Learning collection, *COVID-19 Guidance to parents and carers to support families to stay safe, healthy and learning*<sup>4</sup> was published on 23 April. One of the key messages from Welsh Government in this guidance is that it is important for '*everyone in the household to stay safe and look after the health and well-being of all those you live with*'.

1.8 Play Wales has undertaken a range of activity directed at supporting families in response to the coronavirus pandemic. In particular, The Playful Childhoods | Plentyndod Chwareus website<sup>5</sup> provides practical and useful resources to support parents to provide good and varied play opportunities in and around the home as part of the current guidance relating to social distancing and self-isolation. We have restructured the website to better reflect the information that parents are looking for during the crisis. We have added timely and relevant content, such as a new indoor play section, blog posts, and several Top Tips listings for a range of wide-range of issues and ideas. The Children's Commissioner's website and many local authorities are directing parents and carers to our Playful Childhoods website.

1.9 We have also worked with the International Play Association and played a key role in the development in a new *Play in Crisis* resource for parents and carers.<sup>6</sup>

1.10 The Committee might be interested to note that the Irish government, which has no national play organisation, has set up a website specifically to raise the profile of the importance of play to parents during this time, using the *Play in Crisis* resource as its primary source of

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<sup>3</sup> <https://gov.wales/stay-safe-stay-learning>

<sup>4</sup> <https://gov.wales/covid-19-guidance-parents-and-carers-support-families-stay-safe-healthy-and-learning>

<sup>5</sup> <https://www.playfulchildhoods.wales> | <https://www.plentyndodchwareus.cymru>

<sup>6</sup> <https://www.playfulchildhoods.wales/play-in-crisis>

information. It has also been used for the same purpose by the Turkish Ministry of Education.

1.11 We have provided comprehensive updates to Welsh Government [play policy] officials regarding the specific resources we have published as part of our support to mitigate the impact of the coronavirus crisis.

1.12 However, Play Wales is concerned about the delay in including reference to play, its importance to children and its role in contributing to mitigating the impact of the measures to address the current pandemic in any Welsh Government messaging to parents or briefings to those providing childcare for vulnerable children and children of critical workers. Progress is now being made and we anticipate working with the team responsible for the Parenting Give it Time campaign to share information more widely. A link to the Playful Childhoods website has recently been shared through the Covid 19 Education, Childcare & Work Based Learning Updates.

### **Access to outdoor space**

1.13 On 24 April, Welsh Government released further guidance about *Leaving home to exercise*<sup>7</sup> – ‘*exercise should be local and generally be limited to walking, running and cycling, and travelling by vehicle to exercise should be avoided unless there is a good reason for doing so*’.

1.14 Play Wales is concerned that this guidance provides a very adult-centric view of exercise. As much as they will enjoy long walks and cycling, children get most of their physical activity from playing. Scooting, exploring, jumping, climbing on walls can still happen within the official physical distance guidance – children will need some gentle guidance with this and parents need permission to allow it.

1.15 We draw the Committee’s attention to *Improving safe access to street space for children’s play and physical activity*<sup>8</sup>, a short paper that explores the evidence for families with children to be allowed greater access to very local neighbourhood space, to allow children to play safely within physical distancing rules.

1.16 Some of the changes proposed in the paper include temporary changes to speed limits on residential streets and giving priority to non-motor vehicle road users on some roads.

1.17 The paper discusses how the changes have the potential to make the coronavirus crisis less damaging to children and more bearable for families.

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<sup>7</sup> <https://gov.wales/leaving-home-exercise-guidance#section-41069>

<sup>8</sup> <https://blogs.ncl.ac.uk/alisonstening/improving-safe-access-to-street-space-for-childrens-play-and-physical-activity/>

1.18 The paper has been shared with the Deputy Minister for Economy and Transport and Welsh Government officials working in both play policy and active travel policy and responses are awaited.

1.19 Wales is well-placed to respond to these calls, having been the first country in the world to legislate for children's play through Play Sufficiency Duty within the Children and Families (Wales) Measure 2010 and also, for active travel, via The Active Travel (Wales) Act 2013.

1.20 The Committee might be interested to know that on 28 April, Transport Scotland announced a £10,000,000 fund to support local authorities to develop pop up active travel infrastructure.<sup>9</sup>

### **National Play Policy**

1.21 Over the 2019 summer and October half term holidays, the Welsh Government allocated £100,000 to the *Holiday Hunger Playworks Project* pilot project to test the feasibility of tackling holiday hunger through play and community-based settings. During the pilot the funding was distributed to test different models of provision. Initial evaluation of the pilot was positive and £1,000,000 has been allocated in 2020-21 for this purpose.

1.22 In March 2020, local authorities in Wales were informed by Welsh Government that the Playworks Holiday Hunger funding initiative was on hold. Due to situations related to Covid-19, local authorities were advised that all proposed activity, including planning work, under the funding stream must stop. We understand that the funding remains available for this initiative should circumstances change sufficiently for the initiative to re-start.

1.23 Play Wales understands that difficult decisions regarding funding and face to face provision have been made by Welsh Government and local authorities. However, we advise that the positive evaluation of the *Holiday Hunger Playworks Project* pilot is noted by the Committee and that every effort is made to ensure that this intervention is funded in the future.

### **Play development and playwork provision**

1.24 The involvement and engagement of playwork projects, playwork settings and play development teams has varied across Wales in respect of working with the Childcare Hubs. Where there are people still employed with play specific roles, they are working hard to engage parents, hubs and childcare settings to raise the profile of the importance of play at this time.

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<sup>9</sup> <https://twitter.com/transcotland/status/1255142271508377600/photo/1>

1.25 We understand that the decision to suspend the Holiday Hunger initiative has informed the decision to cancel summer holiday provision in some parts of Wales, despite no clear indication that this whether playwork provision should run or not.

1.26 There remains at the time of writing, no clear steer as to whether there will be an expectation that holiday playschemes should operate in the summer holiday.

1.27 Some playscheme providers have shared their serious concerns that should the current lockdown begin to be eased at the beginning of August, of their anxiety that in a playwork setting it would be extremely challenging, if not impossible to ensure that children maintain two metre physical distancing. Particularly if playschemes are the first opportunity to play out after the lockdown. The recent experience of community parties on VE Day has done nothing to allay these fears.

1.28 There is also a concern that partnership funding for holiday provision may be permanently lost if summer holiday provision is advised not to operate. This would have serious sustainability issues for the future of community based play provision.

## **Children's Rights Impact Assessments**

1.29 Following the introduction of the Coronavirus Act 2020, the Welsh Government moved quickly to introduce numerous emergency regulations and issued guidance in an effort to reduce transmission of the virus while balancing this against the desire to limit restrictions to only what is strictly necessary.

1.30 These regulations and guidance have a direct and significant short and long-term impact on everyone in Wales, including children. Perhaps for children they will have the greatest impact as they impose restrictions on a population group undergoing unavoidable physical, social, and emotional development. Social distancing and social isolation will have a particular effect on children, and we therefore consider that special attention should be given to children in all decisions.

1.31 In Wales there is a legal requirement for Ministers to pay close attention to the interests of children in the management of Covid-19 arising as a consequence of the duty to have due regard to the UNCRC under Section 1 of *the Rights of Children and Young Persons (Wales) Measure 2011*.

1.32 One important aspect of due regard is the requirement to undertake a Child Rights Impact Assessment (CRIA) of any legislation or policy which

will have a direct or indirect impact on children as set out in the Children's Rights Scheme 2014<sup>10</sup>.

1.33 As a member of the UNCRC Monitoring Group, Play Wales is concerned that as far as we are aware this obligation has not been met in the drafting of Covid-19 emergency regulations or guidance in Wales.

1.34 Regarding Covid-19, the UN Committee on the Rights of the Child urges States to respect the rights of the child in taking measures to tackle the public health threat posed by the pandemic. In particular, the Committee calls on States to consider the health, social, educational, economic and recreational impacts of the pandemic on the rights of the child. It calls on States to '*explore alternative and creative solutions for children to enjoy their rights to rest, leisure, and recreation*'.<sup>11</sup>

1.35 Welsh Government's Covid-19 emergency regulations and guidance place restrictions on children's right to assembly (Article 15) and to engage in play and recreational activities (Article 31). These rights are directly linked to the right to development (Art.6(2)) as a fundamental principle of the UNCRC.

1.36 Whilst current restrictions on movement and exercise represent a curtailment of these rights, CRIA would help the Welsh Government better appreciate the extent to which restrictions may (or may not) be necessary, including as emergency measures are gradually lifted. This should help address the situation of those children where there is no proximate access to facilities where exercise may be taken.

### **Thinking ahead - returning to school**

1.37 Play Wales welcomes the announcement that Welsh Government is allocating £1,250,000 to provide additional mental health support for children who may be experiencing increased stress or anxiety as a result of coronavirus. The funding will be provided for school counselling services to deal with an anticipated increase in demand.

1.38 We welcome the commitment to better support the mental health of our children to help with the uncertainty and challenge that the coronavirus pandemic has caused.

1.39 We advise that interventionist programmes can be useful in minimising some of the damaging impact, but they must be complemented by a focus on supporting children to be active participants in building their own resilience. Every aspect of children's lives is influenced by their urge to play, and self-directed, self-determined playing increases

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<sup>10</sup> <https://senedd.wales/Laid%20Documents/GEN-LD9732%20-%20Children's%20Rights%20Scheme%202014-22042014-255569/gen-ld9732-e-English.pdf>

<sup>11</sup> [https://tbinternet.ohchr.org/Treaties/CRC/Shared%20Documents/1\\_Global/INT\\_CRC\\_STA\\_9095\\_E.pdf](https://tbinternet.ohchr.org/Treaties/CRC/Shared%20Documents/1_Global/INT_CRC_STA_9095_E.pdf)

children's opportunities to build their own resilience and support their own health and well-being.

1.40 When children return to school, efforts to improve well-being in schools should focus on providing sufficient time and space for play. This will enable children to be given time to rebuild relationships, social skills and connections with the school environment.

1.41 Prior to schools closing as part of the Covid-10 response, Play Wales had seen an increase in parents getting in touch with concerns about the shortening of school days which is resulting in reduced playtime, and also, the withdrawal of it as part of behaviour management policy.

1.42 This increase in parental concern and recommendations within Estyn's *Healthy and happy – school impact on pupils' health and wellbeing* report<sup>12</sup> prompted us to produce guidance for schools.

1.43 *A play friendly school – Guidance for a whole school approach*<sup>13</sup>, published by Play Wales, provides policy and practice related information to help communities take a whole school approach to children's right to play. This was published in early March and we were mid-way through our promotion and dissemination plan when schools closed.

1.44 It might be anticipated that when schools re-open, children will need the benefit of extended playtime to play out the experiences of the previous months; to benefit from the therapeutic aspects of play.

1.45 We draw the Committee's attention to *Play First: Supporting Children's Social and Emotional Wellbeing During and After Lockdown*<sup>14</sup>, a letter to the four nations' government Ministers written by academics with expertise in children's mental health. The letter, endorsed by Play Wales, urges the governments to prioritise children's play and socialising with friends over formal lessons and academic progress when schools reopen and restrictions are eased.

### **Thinking ahead - supporting play in communities**

1.46 Children's access to outdoor space for play, exercise and enjoyment differs greatly across Wales and this is heightened in the current situation. Some children live in accommodation with outdoor gardens, ample outdoor community space and supportive carers with time to support play, whilst others don't. This is articulated in the quote below, taken from an action research project, which piloted the opening of school grounds when the teaching day ended and was facilitated by Play Wales:

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<sup>12</sup> ESTYN (2019) *Healthy and happy – school impact on pupils' health and wellbeing*. Cardiff: Crown Copyright.

<sup>13</sup> <https://www.playwales.org.uk/eng/publications/schoolsguidance>

<sup>14</sup> <https://www.sussex.ac.uk/about/documents/play-first-letter.pdf>

*'Oh, there was quite a big age range – from eighteen months to eleven in one family, there was like four children living in a two-bedroom flat, with no access to the outdoors, so six people living in two bedrooms, and I thought “Well where do they go, what do they do?” We [the mother and I] spoke quite in-depth. There was an eighteen-month-old baby. He just wanted to get involved with everyone else. When he arrived, he would happily run around for the whole session.'*  
(Student volunteer, post project interview)<sup>15</sup>

1.47 Where children have accessed their local community for exercise and play in the current situation, it has mostly been accompanied by parents. Care must be taken to ensure that, when restrictions on outdoor spaces is relaxed, that children feel connected to their communities to help them to gain confidence to play out, when the time is right. Parents and communities will also need reassurance and confidence building.

1.48 Making better use of community assets will support children, parents and communities feel more confident about playing out, and therefore, better connected. For this, we advise:

- School communities should be encouraged to consider making their outdoor space available for playing when the teaching day ends and during weekends, as noted in Welsh Government guidance<sup>16</sup> and supported by the Play Wales *Use of school grounds for playing out of teaching hours toolkit*<sup>17</sup>
- Attention is given to the potential measures raised within the previously mentioned *Improving safe access to street space for children's play and physical activity* paper:
  - Enforcement of 20mph limits and reduction to 20mph on urban streets
  - Temporary introduction of 10mph limits on residential side roads
  - Temporary closure of some streets to through traffic, with road signs and other filters
  - Temporary widening of pavement space to create more space for pedestrians; and narrow and slow the flow of motor traffic
  - Priority to non-motor vehicle road users on all but main roads.

## Conclusion

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<sup>15</sup> Mannello, M; Connolly, M; Dumitrescu, S; Ellis, C; Haughton, C, Sarwar, S and Tyrie, J (2019) *Opening the School Gates: facilitating after-school play in school grounds* in (Ed) Reed, M and Fleet, A. Rethinking Play as Pedagogy. London: Routledge

<sup>16</sup> Welsh Government (2014) *Wales – A Play Friendly Country*. Cardiff: Welsh Government (Crown Copyright)

<sup>17</sup> <https://www.playwales.org.uk/eng/publications/schoolsgroundstoolkit>

1.49 Playing is the most natural and enjoyable way for children to keep well and be happy. It can contribute to improved well-being for everyone during times of uncertainty and change. Playing is something that children do whenever they have the chance. It is their way of supporting their own health and well-being. The onset of the coronavirus means we had to deal with uncertainties and unknowns very quickly and with little preparation. Being at home for long periods of time and not being able to see friends and visit familiar places is a confusing situation. Despite the current pandemic, children will still need and want to play, now and when restrictions begin to relax. During times of uncertainty playing:

- helps to give children a feeling of normality and joy during an experience of loss, isolation and trauma
- helps children to overcome emotional pain and regain control over their lives
- helps children make meaning of what has happened to them, and enable them to experience fun and enjoyment
- offers children an opportunity to explore their own creativity.

1.50 Play Wales urges Welsh Government to continue its strong tradition of supporting children's right to play, both during the immediate management of the COVID-19 crisis and as emergency measures are gradually lifted. Play Wales looks forward to continuing to work with Welsh Government colleagues in this endeavour.