



A happy talent

'It is a happy talent to know how to play.'
Ralph Waldo Emerson



.....

Disabled children and young people's access to play in Wales 2007: a review of local authority strategies.

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Foreword from Keith Towler, Children's Commissioner for Wales

Like it or not, play is a serious matter. Children and young people have consistently highlighted it as something that demands our attention and needs to improve. This report is a key part of my office's commitment to enabling all children and young people to enjoy — literally — their right to play, relaxation and leisure and I hope that those responsible for making sure that they are able to do so find it helpful and informative.

We are aware that this work took place very early in the life of many local play strategies, and also that there is some really good practice out there that simply wasn't reflected in the documents provided. The involvement and support of Children in Wales with the project is acknowledged and appreciated. Making the links between the United Nations Convention on the Rights of the Child, service delivery and practice can seem less than straightforward at times, but access to play opportunities for disabled children and young people is one area where the relevance is clear.

This project was one of those identified during the process introduced by my predecessor as Children's Commissioner, the late Peter Clarke, to give Wales' children and young people a real say in influencing and prioritising the work programme. I'm proud to say also that it shows that those who participated in our *What next?* events or voted online, clearly weren't motivated by self-interest. Through interactive workshops their understanding of the need to give **all** children and young people the same opportunities was demonstrated clearly. Peter was greatly impressed by the views and opinions expressed and the enthusiasm shown at his last *What next?* event. In his place I would like to thank all the children and young people who helped make this report possible — especially the disabled young people who took part in the workshops over the summer of 2007. We couldn't have done it without you and we're determined to make a difference.

Keith Towler



About the Children's Commissioner for Wales

The Children's Commissioner for Wales (CCfW) is an independent children's rights organisation, established by statute, and charged with safeguarding and promoting the rights and welfare of Wales' children and young people. CCfW is funded by the Welsh Assembly Government (WAG) and its main areas of concern coincide with the responsibilities of the National Assembly for Wales (NAfW) — although there is a power to consider and make representations on ANY matter affecting the rights and welfare of children.

Under the legislation, the Children's Commissioner's role isn't limited to what are usually considered to be children's issues, such as health, education and social services. Planning, transport, the environment, economic development and rural affairs also fall within the scope of his role.

The Commissioner can:

- review the effects of policies, proposed policies and the delivery of services to children
- examine the case of a particular child or children if it involves an issue that has a more general application to the lives of children in Wales
- require information from agencies or persons acting on their behalf, and require witnesses to give evidence on oath
- provide advice and assistance to children and young people, and others.

Among the work conducted and services provided are:

- an advice and support service for children and young people and adults who are concerned about their rights and welfare
- policy and service reviews, for example of systems and arrangements in place for children's complaints, advocacy and reporting malpractice

- a bilingual website and electronic methods of maintaining a dialogue under the banner Backchat
- events for children and young people to allow them to influence and help prioritise the workplan of the Children's Commissioner and his team
- consultation work with children and young people
- visits to schools, local groups and projects and a presence at larger events
- a targeted programme of workshops with children and young people from vulnerable or 'hard to reach' groups
- influencing activity aimed at government at all levels and the general public
- a range of activities designed to promote awareness of children's rights and in particular the United Nations Convention on the Rights of the Child (UNCRC).

Under the legislation that established the CCfW there is a duty to:

- have regard to the UNCRC in everything he and his team do
- make sure that children and young people know where his offices are and how to contact him and his team
- encourage children to contact him and the team
- ask children what they think about his work and future work, and allow them to influence the work programme
- make sure that he and his staff go and meet children wherever they are.

01 How this project came about

The Children's Commissioner for Wales has a responsibility to involve children and consult with them on his work programme and setting priorities. The Commissioner's team works directly with a large number of children and young people across Wales and information is drawn to our attention through a variety of routes. Children, young people, professionals who work with them, and parents or carers draw the Commissioner's team's attention to a range of issues that affect children's lives in Wales today.

In 2005, as part of our work to make sure that we have an ongoing dialogue with children and young people and a systematic way of making sure that our work programme reflects what they have told us, we developed a *Framework for the Involvement of Children and Young People*. This has helped them have a real say in the work of the office. As part of this framework, we have set up Advisory Groups of young people, in both the south and north of Wales, who regularly help and advise us on how we work and are involved in the selection and recruitment of staff. They work with us to look at the issues that have come up through all aspects of our work, and help us identify themes or possible projects for future work. These issues are drawn from all the information gathered from children and young people and adults over the previous year. Issues emerge from all aspects of our work, including workshops and discussions with children and young people, advice and support and policy work.

Another part of the framework gives a larger number of children and young people from all over Wales a say in choosing which of these themes should be priorities in the following year's work programme. We stage *What next?* events annually where the themes or

projects are presented and explored with children and young people and they decide which two will be taken forward.

We try and make the events as inclusive, accessible and enjoyable as possible and places are allocated through schools, organisations and projects throughout Wales. Applications are particularly welcome from disabled young people, lesbian, gay and bisexual young people, gypsy or traveller children, homeless young people, those looked after or recently leaving care, young offenders and other marginalised groups. However, we don't need to know about anyone's background unless it means that we have special requirements to help them participate. We try to make sure that those taking part reflect the diversity of backgrounds and life experiences of children and young people throughout Wales, and they are encouraged to think about what would benefit other children and young people, rather than just to consider the issues from their own point of view.

During the first cycle of our *Framework for Involvement*, children and young people identified two broad themes: play and leisure and education and schools. As a result of this direct mandate from children and young people, we focused our work on issues linked to these themes in the months that followed.

We found that trying to take two broad priority areas forward didn't always lead to us having clear outcomes through which children and young people could see the impact we have made. We felt we needed to be more specific in the options we suggested so that we could feed back and show what we had achieved. In 2006-07 our *What next?* events gave children and young people a chance to have a say on what distinct projects they would like us to take forward within the two themes. Throughout 2006, children and young people told us more about play and leisure — and about education and schools. Our Advisory Groups reviewed the information we had gathered and helped us to develop a shortlist of options for the events.

For the play and leisure theme, the options were:

- Talk to local councils about improving play for disabled children and young people
- Encourage people to ask children and young people how money should be spent on play and leisure in their communities
- Look for ways to make leisure centre prices fairer across Wales
- Give local councils ideas on how to improve public transport.

In late 2006, we hosted *What next?* events at Y Galeri in Caernarfon (for over-11s) and at the Liberty Stadium in Swansea (for 11s and under). One hundred and fifty children and young people attended each event. We also invited “adults who could make a difference” including WAG officials, Welsh Local Government Association (WLGA) representatives, Assembly Members and others to listen to what the 300 children and young people had to say. Children and young people who didn’t attend the events also had a chance to vote via our email group, Backchat, and our website.

Each child or young person was asked to rank the play and leisure issues in order of importance. The action with the highest number of votes was:

30% of respondents wanted us to help improve play opportunities for disabled children and young people.

The decision of children and young people at our *What next?* events was timely given that the *National Service Framework for Children, Young People and Maternity Services*, launched in 2005, included the following key action:

5.2 Disabled children and young people have equity of access to play and leisure services, including holiday play schemes, after school clubs and pre-school provision, with appropriate support if necessary.¹

This and other policy initiatives have informed our consideration of how to take forward the children and young people’s mandate from the events.

02 Play in Wales: policy and strategy

Introduction: the importance of play

Play is an activity which makes children so obviously happy but it is also essential to their development both as individuals and members of the community.

Without always realising it, we judge a community by the indications that it has happy children. An area in which we regularly see children using open space is judged to be a safe environment and the children part of a community that is meeting the needs of its people.

Many adults, looking back on their own childhoods, comment on how the very nature of childhood has changed for the worse. It is true that there are many barriers to children’s enjoyment of play. Modern living has resulted in there being less open space, more traffic and ever growing fear of crime, as well as changes in traditional family structures and working habits.

Another barrier to children’s development through play is an increased aversion to risk. With no exposure to risk children will not learn to assess and manage risk and will not develop essential problem solving skills.

Strategic and policy background in Wales

Compared to their peers in many other parts of Europe, young people in Wales, and throughout the UK, engage in less physical activity and sport. They are allowed less freedom of mobility and physical independence. They spend more time watching TV and are less evident in

¹Welsh Assembly Government: National Service Framework for Children, Young People and Maternity Services <http://www.wales.nhs.uk/sites3/Documents/441/EnglishNSF%5Famended%5Ffinal.pdf>

the public domain. This 'play deprivation' has been recognised by a number of studies in Wales and the UK in recent years.² Adrian Voce, director of Play England has commented that:

*'The extent of play deprivation experienced by many children today is at least as damaging as the prevalence of junk food'*³

Engaging with children and young people to find creative solutions to this situation is made more difficult when the public space agenda is dominated by the perceived need to safeguard our communities from some young people's behaviour, via curfews and dispersal orders. Additionally, planning policies at both national and local levels in recent years have reduced the number and quality of open spaces where children feel that they can play.

Local authorities in partnership with private developers have the potential to help deliver high quality play across Wales. Section 106 of the Town and Country Planning Act 1990 allows a local planning authority (LPA) to enter into a legally-binding agreement or planning obligation, with a land developer over a related issue. The One Wales document commits the WAG to reforming and reissuing guidance on local criteria for use in section 106 agreements.

These 'Section 106 Agreements' could be used as tools for promoting the development of play facilities, particularly when negotiating provision of open green spaces.

One Play Strategy Review has noted:

'Too often an 'adult agenda' can get in the way of delivering play-friendly developments'

One of the more constructive approaches is to encourage dialogue between children, young people, and adults within our communities. This is an approach advocated in the joint publication from the Children's Commissioner for Wales and South Wales Police, *Something to Do, Someone to Listen*.

The role of the Welsh Assembly Government

In 2002, WAG published guidance entitled *Improving Services for Children and Young People: A Framework for Partnership*; which set out the vision for the future developments in the delivery of children and young people's services.

The guidance envisaged that all children's and young people's services would be jointly planned, jointly commissioned and jointly delivered by those agencies and organisations providing services to children and young people. Statutory agencies and voluntary organisations providing both universal and specialist services would meet to draw up plans that identified the aims and objectives for all children's services.

However, it was not made clear where the responsibility for the development of local authority play policies or strategies lay, despite the fact that play is recognised as being of intrinsic importance to children's and young people's development.

The guidance advised that each new children's services planning partnership's work should, in line with WAG's vision for children's services, be informed by the principles of the UNCRC. The UNCRC identifies the right to play as a right for all children:

Article 31

1. *States Parties recognize the right of the child to rest and leisure, to engage in play and recreational activities appropriate to the age of the child and to participate freely in cultural life and the arts.*
2. *States Parties shall respect and promote the right of the child to participate fully in cultural and artistic life and shall encourage the provision of appropriate and equal opportunities for cultural, artistic, recreational and leisure activity.*⁴

² Play Wales (2003) *Play Deprivation* <http://www.playwales.org.uk/downloaddoc.asp?id=1&page=42&skin=0>

³ National Children's Bureau (2006) *Children's play deprivation is as damaging as junk food, says Play England* http://www.ncb.org.uk/Page.asp?originx_4261tp_28694342024139s72u_200610105438w

⁴ United Nations Convention on the Rights of the Child (1989) <http://unicef.org.uk/youthvoice/pdfs/uncrc.pdf>

This means that all children's services, statutory and voluntary, universal and specialist should be planned and provided on a multi-agency basis to meet identified local needs. The lead body for this multi-agency approach in each of the 22 local authorities in Wales is the Children and Young People's Framework Partnership.

So, it is the local authority Children and Young People Framework Partnerships, who are required to draft a local Play Strategy that will form part of the single Children and Young People's Plan (CYPP) by September 2008.

The Disability Discrimination Acts 1995 and 2005

As recognised by the Disability Discrimination Acts, access to services is not just about installing ramps and widening doorways for wheelchair users — it is about making services easier to use for **all disabled people**, including children who have a sensory impairment or a learning disability. Under the Act, it is unlawful for service providers to treat disabled children and young people less favourably than others for a reason related to their disability. Service providers now have to make "reasonable adjustments" to the way they deliver their services so that disabled children and young people can use them.

Failure or refusal to provide a service that is offered to other children or young people to a disabled child or young person is discrimination unless it can be justified.

The Disability Discrimination Act 2005 (DDA), introduced a new legal duty on all public sector organisations to promote equality of opportunity for disabled people. The DDA gives disabled people, including children and young people, important rights of access to everyday services. This includes services provided by local authorities and therefore includes access to play and leisure provision.

The general duty requires public authorities to adopt a proactive approach, mainstreaming disability equality into all decisions and activities.

Equality of opportunity cannot be achieved simply by treating disabled and non-disabled people alike. The Act states that the duty requires public authorities to have due regard to the need to take steps to take account of disabled persons' disabilities, even where that involves treating disabled persons more favorably than other persons.

The duty to make reasonable adjustments is an anticipatory duty which means that local authorities cannot just wait until a person with a specific disability applies for a specific provision before making an adjustment. The local authority should anticipate what may need to be done and make adjustments accordingly.

This means that local authorities must take account of the needs of disabled children and young people when planning any service provision, from the outset — including the drafting and implementation of a Play Strategy.

Disabled children and play

Article 31 of the UNCRC sets out every child's right to play, however, it has been acknowledged by a number of writers and support groups that disabled children and young people find it difficult to access play opportunities.

In 2007, Play Wales published a briefing, *Inclusive Play and Disability*, which identified the following barriers which may prevent disabled children from playing and socialising within their own community. The barriers are:

- Attitudes towards disabled children and the view that disabled children need different opportunities to other children. There is a focus on the care rather than the play needs of a disabled child
- Access — including physical access to buildings and provision
- Communication — language and communication may prove a barrier to some children being included in play provision

- Information — families with disabled children and young people say that they are unaware of the play opportunities in their areas
- Risk — some parents and carers may be more protective than others and seek to avoid any risks in their child's play
- Poverty — more than half of the families of disabled children in the UK experience poverty which impacts on their ability to participate in play opportunities.

(Play Wales, 2007)

Play Wales has suggested that through training professional playworkers can overcome some of these barriers — for example communication and attitudes. This again underlines the importance of the Playwork Centre for Wales.

Other barriers, though, need to be overcome through reforms at a local level. The *National Service Framework for Children, Young People and Maternity Services in Wales* recognises that:

*'it is not only disabled children's impairments which determine their quality of life, but also negative attitudes and a disabling environment for example unequal access to education, communication, employment, leisure activities, housing and health care.'*⁹

The introduction of the requirements of the Disability Discrimination Act has helped to raise public awareness of some of the difficulties that can be faced by disabled people. Significant adjustments often are being made because of this awareness rather than fear of litigation. Improvements to physical access to public buildings and schools are to be seen almost everywhere but there is still much work to be done. An example is reported in the Contact a Family report *School When You Are On Wheels*:

"My daughter has to go to school in her really old wheelchair, 'cause the tables are too small for her legs to go under... When

*she goes in her new chair, she has to lift up the table and then put the table on her legs, so she is very stressed out about this."*¹⁰

Parent

This illustrates that, for disabled children and young people, full equity of provision is yet to be fully realised in Wales, whereby disabled children can get true benefit from play provision. This was well illustrated by the 2007 report of the NAFW's Equality of Opportunity Committee *Why is it that disabled young people are always left until last?* which commented:

*'... historically services have been provided to disabled young people by non-disabled people, without young people themselves having a real say in what they want and need.'*¹¹

Play Wales (2007) summarised the challenge of making play fully inclusive in this way:

*'As play providers, if we are to turn policies and legal requirements into workable reality, we require open-mindedness, honesty, determination, hard work and creativity. Every child in Wales is entitled to quality play experiences and it is our role and a child's right to ensure that no child is excluded.'*¹²

"Hard work and creativity" (ibid.) will certainly be needed to overcome the remaining barriers which still prevent many disabled children and young people from being able to play. Not the least of these are attitudes to risk — it is not usually the children and young people who are able to assess and decide on an acceptable level of risk for an activity they want to do. This is usually decided by either their parents or carers or professionals who may fear litigation.

The participation of disabled children and young people in the planning, delivery and evaluation of play services may be the only way to address these remaining barriers.

⁹Welsh Assembly Government: National Service Framework for Children, Young People and Maternity Services <http://www.wales.nhs.uk/sites3/Documents/441/EnglishNSF%5Famended%5Ffinal.pdf>

¹⁰Contact a Family (2006) *School When You Are On Wheel* http://www.cafamily.org.uk/wales/swyaow_ev07.pdf

¹¹Equality of Opportunity Committee Welsh Assembly Government (2007) *Service Provision for Disabled Young People Why is it that disabled young people are always left until last?*

¹²Chwarae Cymru (2007) <http://www.playwales.org.uk/downloaddoc.asp?id=234&page=256&skin=0>

03 What we did

Methodology

We took a two phase, integrated approach to this project. This consisted of:

- desk research on policies, strategies, guidance and relevant reports including a detailed analysis of the play strategies provided by local authorities
- gathering the views of disabled children and young people.

We undertook a review of available literature and information about the importance of play, and disabled children's thoughts about play together with a review of current legislation and guidance. The ideas generated are represented in the diagram below.

We decided that the most appropriate way forward was to request, collect and analyse the play strategies of each local authority in Wales to see how they had considered the needs of disabled children.

We wrote to the Chief Executive of every local authority in Wales (see Appendix) in order to:

- inform them that we were undertaking the review
- explain the methodology and timescales of the review
- provide the terms of reference
- request copies of their play strategies
- request contact details of an officer who could be contacted in the event of any queries.

Key elements of Play Strategy?

Play: Disabled children and young people's access

Levels of provision

- Day to day, week to week not just summer play schemes
- School holidays across the year

Access

- Transport
- Entrance costs to leisure centres
- Physical access — changing rooms, showers, swimming pools etc (DDA)
- Wheelchair provision
- Staffing/resources
- Timing — hours of opening (seasonal)

Decision Making

- 'freely chosen'
- Right to choose
- Ability/enabled to make own decision/choice

Participation

- Involvement
- Engagement
- Monitoring
- Evaluation/review
- Wishes views
- Consultation
- Feedback

Partnership

- Integrated provision
- Single Plan (Sec26 Children Act 04)
- CC Act Sufficiency Assess
- Roles of the Inspectorates
- Importance of play recognised by LA as part of developmental process

DDA Compliance

- Nothing about us — without us
- Participation
- Enablement

Information

- Dissemination
- Marketing
- Communication strategy
- T.V. guide to enable participation
- Availability
- Formats
- Right to play
- Educate to play
- Conditioning

Attitudinal Change

- Training & recruitment
- 'freely chosen' — rights of disabled children
- Families and workers

We also worked with colleagues from Children in Wales, who host the Disabled Young People's Network for Wales, to design and run workshops with disabled children and young people across Wales, to discover their views and opinions about play.

Workshops were set up and held with five disabled young people's groups – in Aberystwyth, Barnardo's North Denbighshire group, Barnardo's Mid Denbighshire group, Cardiff People First group and Barnardo's Clebran group based in Gwynedd.

The workshops aimed to gather these young people's views and opinions about play, and specifically disabled young people's access to play opportunities. Participants took part in activities designed to find out:

- What play meant to them
- Information about how, where and when they played
- Their views on being involved in the planning of play provision
- Having information about play opportunities
- Risk taking
- Transport
- About their ideal play facility.

A total of 41 young people took part in workshops during August 2007. Those taking part had learning and physical disabilities ranging from mild to profound.

The key themes that emerged from the workshops were:

- Play means a variety of different things to different young people
- There were no times (of year, week or day) that were more popular for young people to play
- The young people tended to play in structured environments (often organised through the groups we visited)

- Many of the young people did not have information about play opportunities
- Most of the young people said they did not need an adult with them when they played, however when asked most said they were usually accompanied by family, social workers or friends.

04 How we assessed

Using the information from the workshops together with the results of our literature review we developed the criteria for analysing the play strategies. These criteria were used to draw up a set of prompt questions; these are explained below.

Criteria for analysing the play strategies

The criteria were expressed in the form of questions which disabled children and young people might themselves ask, for example:

- How are disabled children enabled to exercise choice about their play opportunities?
- How are disabled children able to engage in free play opportunities?

The criteria used to review the strategies were in four main areas:

- Consideration of the needs of disabled children and young people
- Participation of disabled children and young people
- Encouraging more play provision
- Choice.

These clarify whether a local authority had taken the needs of disabled children and young people into consideration when drafting their strategy.

Play Strategies received

Unfortunately, we were unable to apply the criteria as rigorously as we had hoped for several reasons:

- Many of the play strategies we received were draft or in a very early stage of development. Many still contained editing comments
- Some did not make any reference to disabled children and young people, or disability. Although there are often references to “all children”, there are times when a specific reference to disability would make the intentions of the strategy clearer
- Some local authorities had not developed play strategies. However we did apply the criteria to any other submitted documentation that made reference to play and leisure. Similarly, if a local authority sent further documentation about recent developments, these were also considered alongside the strategy.

05 What we found

General comments

The style and structure of many of the play strategies we received was formulaic. Some of the policies suggested that local authorities had not given much consideration or original thought as to what play means for children within their own local authority areas. Many seemed to prefer to use quotations (most commonly one from David Lloyd George) from national documents.

Many of the play strategies are still not receiving full recognition and acceptance in their local authority, and, perhaps because of this, are not adequately funded. Only two of the strategies we received had forewords or introductions from the relevant elected members.

We analysed each of the play strategies we received, however we did not receive any documentation from Anglesey or Torfaen local authorities.

Consideration of disabled children and young people

If we lived in a society in which disability was mainstreamed, there would be little need for direct reference to disability. In our consideration of the play strategies, we looked for evidence that there was an intention to include disabled children when reference was made to “all children”.

Some strategies make statements that all future play provision should be planned to include the needs of disabled children from the outset, with no reference to plans for improving existing provision. It would appear that making play inclusive of all children is an afterthought rather than being integral to all policy and strategy development.

Some of the local authorities appear to use resources to count or audit how many facilities/resources provide opportunities for disabled children rather than working towards bringing all provision to the level where disabled children and young people can access and enjoy.

There were few references to the statutory duties of the Disability Discrimination Acts and the Children Acts.

Some of the strategies identify disability as a barrier to accessing play; but, unfortunately, they do not set out clearly how this barrier will be overcome.

Participation

Despite some individual instances of good practice, the participation of children and young people in the planning delivery and evaluation of services appears to be extremely limited and, in our opinion, rarely meets the WAG’s National Standards for Children and Young People’s Participation. Local authorities should consider using the

Inclusion in Strategy	Local Authority																						
	Blaenau Gwent	Bridgend	Caerphilly	Cardiff	Carmarthenshire	Ceredigion	Conwy	Denbighshire	Flintshire	Gwynedd	Merthyr Tydfil	Monmouthshire	Neath Port Talbot	Newport	Pembrokeshire	Powys	Rhondda Cynon Taff	Swansea	Vale of Glamorgan	Wrexham	Anglesey	Torfaen	
Consideration of disabled children and young people																							
Does the strategy state an intention to include disabled children from the outset?	★	★	★		★	★								★		★	★		★	★			
Does the strategy refer to the Disability Discrimination Act?					★	★		★				★	★		★					★			
Does the strategy refer to consideration of disability in current provision?												★	★	★		★	★						
Does the strategy refer to consideration of disability in future provision?	★		★	★	★	★	★	★	★			★	★	★	★	★	★	★	★	★	★		No documents received
Does the strategy refer to the advantages of play as therapy?	★				★	★		★				★					★	★	★	★			No documents received

Participation Standards Self-Assessment Pack recently produced by the Participation Unit at Save the Children and endorsed by the WAG which includes details of the standards.

Participation of children and young people should not be limited to a one-off consultation exercise. True participation occurs only when service providers engage with children and young people on a long term basis and involve them in the production of the strategy, the design, planning and the evaluation of services

as well as in the initial consultation. Even with very young children, appropriate participatory work can take place and there is significant creative practice which can be adapted for this purpose. Resources are available from a variety of sources, including the Participation Unit. Innovative practice in participation is often not shared across local authority areas and we welcome the initiatives that are taking place in order to support local partnerships and exchange notable practice.

Inclusion in Strategy	Local Authority																						
	Blaenau Gwent	Bridgend	Caerphilly	Cardiff	Carmarthenshire	Ceredigion	Conwy	Denbighshire	Flintshire	Gwynedd	Merthyr Tydfil	Monmouthshire	Neath Port Talbot	Newport	Pembrokeshire	Powys	Rhondda Cynon Taff	Swansea	Vale of Glamorgan	Wrexham	Anglesey	Torfaen	
Participation																							
Have the perceptions of disabled children and young people about their play needs, or experiences been sought and included in the strategy?		★								★	★			★		★		★		★			
Have disabled children and young people had opportunity to comment on the play strategy?																★							
Are disabled children and young people able to provide feedback about their play experiences?	★	★									★	★		★		★							
Are disabled children involved in monitoring how the play strategy is delivered?												★			★	★					★		
Is there evidence that the play strategy actually delivers what disabled children and young people want? Are there plans to find out?												★		★									
																						No documents received	No documents received

Although many of the strategies state that parents/carers/disabled children and young people are consulted, this is far from realising the full benefits of children’s participation. There were few strategies which explained clearly whether or how disabled children and young people have been enabled to participate.

While several mentioned consultation with children and young people about their play needs in the process of developing the strategy, there was little evidence that children and young people had seen the strategy or been given the opportunity to comment on a child friendly version of the completed strategy. As noted earlier, some of the strategies were still unfinished and not at a stage to be given to children and young people.

In the initial stages of preparation for this review, we looked for play strategies that were published on local authority websites. Only a few were available, yet for children and young people this is one of the ways in

which they find and receive information. We hope that every local authority will publish their finalised play strategy on their website and consider other ways of making their key messages and commitments known to the children and young people in their area.

Some strategies made little distinction between consulting parents and carers and children. It was noticeable that when the child was disabled the strategies were even more likely to only refer to consulting with parents and carers. In the majority of cases, disability does not mean that a child or young person cannot participate, and there may be concern that no steps were taken to ensure that all had a say. In addition, it is well recognised that parents and children have different attitudes towards what is an acceptable risk in play. Quite apart from it being a fundamental right, it is therefore beneficial that consultation takes place with both parents and carers and with children separately.

Few of the strategies reviewed indicated whether disabled children would be asked for ongoing feedback. Few indicated whether they would be involved in evaluating play provision and ensuring that those drafting and implementing the strategy were made aware of the actual experience of play for disabled children in their local authority.

Encouraging more play provision

We considered it important that all facilities under local authority control which provide play opportunities could be used for play by all children (if necessary, supported by playworkers). The involvement of voluntary

organisations is essential to widening the range of play opportunities available to all children including disabled children. Some disabled children had told us that their only play opportunities were during school holidays and so we also looked for evidence of year round provision. As mentioned earlier, the involvement of trained playworkers can reduce the barriers to disabled children’s play opportunities, so we looked at how the strategy considered the availability and training of playworkers.

Local Authority	Blaenau Gwent	Bridgend	Caerphilly	Cardiff	Carmarthenshire	Ceredigion	Conwy	Denbighshire	Flintshire	Gwynedd	Merthyr Tydfil	Monmouthshire	Neath Port Talbot	Newport	Pembrokeshire	Powys	Rhondda Cynon Taff	Swansea	Vale of Glamorgan	Wrexham	Anglesey	Torfaen
Encouraging greater play provision																						
Are local schools involved in the delivery of the play strategy?	★			★ ★								★		★ ★				★ ★				
Are leisure centres involved in the delivery of the play strategy?																						
Does the strategy include mention of multi-agency working with agencies such as the police, highways, housing and education?	★ ★				★ ★						★				★			★				
Does the strategy explain how play is considered by the Children and Young People’s Framework Partnerships?	★		★	★	★ ★					★	★	★	★	★	★			★	★			
Does the strategy say that play will be included within the Children and Young People’s Plan from April 2008?			★								★				★ ★			★				
Does the strategy address play provision throughout the year for disabled children and young people?			★		★ ★																	
Does the strategy address the provision of safe open spaces available for play after sunset and in bad weather?					★																	
Does the strategy refer to training is being made available for staff to enable and promote play opportunities for disabled children and young people?	★				★										★		★					
																					No documents received	No documents received

Many strategies emphasised the importance of engaging schools within the wider play strategy. Many had details about how play was to be encouraged during school hours and some, but fewer, addressed the community focussed schools agenda of utilising the school facilities out of school hours and in school holidays. It was surprising, however, that leisure centres were not similarly seen as having facilities that could also be used to increase the range of play opportunities.

There were surprisingly few strategies that discussed the importance of engaging a variety of agencies in the production and implementation of the play strategy. One important area that some addressed was the need to have planning requirements that each new housing development should include an area of open space for play which can be arranged under Section 106 of the Town and Country Planning Act 1990. Traffic control and safe routes to play opportunities were also considered in some strategies. However these important considerations were lacking in so many strategies. It is to be hoped that, in finalising their drafts, these issues will be given greater consideration by local authorities.

We understand that many of the strategies received were written before there was a requirement for local authorities to produce a CYPP and did not expect many to refer to the plan directly. However, we kept this question in order to aid our monitoring of play developments in the future.

It is the Children and Young People's Framework Partnerships that are charged with the production of the CYPP and it was therefore encouraging to see so many of the strategies state how the Partnerships are kept informed about play developments. We will study the Plans from each local authority when they are produced in September 2008 to see how play is included.

Few strategies specifically addressed the need for suitable play opportunities to be available throughout the year. No doubt many thought this to be implicit and there was no need to state this. Similarly few addressed the provision of safe places to play after sunset or in bad weather — considerations which are more likely to limit the opportunities for disabled children.

Most strategies discussed the need for training for play workers which would include training on dealing with parental concerns about risk. Few, however, discussed the need for training playworkers on disability issues or, importantly, on how they might promote joint use of the facilities by both disabled and non-disabled children.

Choice

Choice is an important part of everyone's lives and learning how to make informed choices based on information is an important part of a child's development towards becoming ever more independent. Risk, access and information had been highlighted in the research as some of the barriers to disabled children's play opportunities, so we looked for evidence of how local authorities had attempted to overcome these barriers in their play strategies.

If the aspirations expressed in many strategies for future provision are realised, disabled children will one day have a choice of play opportunities. However, while there are no efforts to ensure that existing provision is suitable for disabled children, choice is severely limited. Many strategies rightly pointed to the need to make new provision suitable for the "most local" disabled children. We would agree that having play opportunities close to home is important, however, so too is having a range of options and the ability to exercise choice.

The importance of free play is well recognised but not all of the strategies contained clear statements as to how this

Inclusion in Strategy	Blaenau Gwent	Bridgend	Caerphilly	Cardiff	Carmarthenshire	Ceredigion	Conwy	Denbighshire	Flintshire	Gwynedd	Merthyr Tydfil	Monmouthshire	Neath Port Talbot	Newport	Pembrokeshire	Powys	Rhondda Cynon Taff	Swansea	Vale of Glamorgan	Wrexham	Anglesey	Torfaen
Choice																						
Are disabled children enabled to exercise choice about their play opportunities?																						
Does the strategy recognise the importance of free play?	★					★ ★				★ ★				★ ★ ★							★	
Does the strategy recognise the importance of enabling children to use the same facilities whether disabled or not?						★							★ ★			★					★	
Does the strategy recognise the need for an element of risk in play?	★ ★				★ ★				★ ★	★ ★	★ ★	★ ★	★ ★	★ ★	★ ★	★ ★	★ ★	★ ★	★ ★			No documents received
Does the strategy recognise the need for local transport and play policies to complement each other to ensure access?					★						★ ★					★					★	No documents received
Is information provided to disabled children and young people about play opportunities that are available?			★																			No documents received

was to be encouraged. The young people we consulted gave a clear message that they didn't need an adult supervising their play and yet, especially for disabled children, supervision appears to be common.

Children and young people themselves are aware of the need for their play facilities to be safe and, in one strategy, the children and young people were reported as saying that they felt that having their play facility visible to adults would make it safer.

Most strategies recognised the importance of there being an element of appropriate risk. Some stressed the importance of playworkers addressing parental concerns about risk. Many areas though, at the time their strategies were sent to us, had not yet appointed playworkers to perform this task.

Although several strategies emphasised that local transport policy was an important factor

in the accessibility of play opportunities, none addressed the additional needs of disabled children in this respect. Traffic calming measures and the provision of safe routes to play facilities were mentioned in surprisingly few strategies.

The provision of information to children is an area that received little attention in the strategies despite several references to the provision of information to parents. Certainly, the children and young people whom we consulted said they had not received information about play opportunities. Particularly for children and young people who are disabled, this is a significant omission. If parents need to be persuaded to increase choice of play opportunities for their children, who better to do this than the children and young people themselves.

06 Keeping children and young people in the picture, next steps and monitoring progress

This report is being published at the same time as a children's version so that we get the messages out to those who matter most. During the *What next?* events in 2008 we also reported back to children and young people on some of our findings and plans for taking things forward. The events held in January 2008 aimed to gather information to help inform the new Children's Commissioner for Wales' vision for the organisation and gave around 500 children an opportunity to tell us what's good about growing up in Wales and what could be better. It will be no surprise to hear that play, leisure and needing something to do was up there with the top issues once again. We expect to continue with work related to this theme for some time.

When we've conducted previous reviews, we have made recommendations for change. The legislation that established the Commissioner is clear about the monitoring of those recommendations and evaluating progress. Given the early stage at which we found many play strategies, we felt that recommendations would not be appropriate in this particular review. We were also aware of a clear gap between the information some local authorities volunteered about the provision they had in place for disabled children and what was included in the strategy. This is something that those responsible for the play strategies should be encouraged to address.

We hope that the analysis and observations made in this report will be useful when finalising local play strategies. While we have not sought to use our criteria to either criticise or to prescribe good practice, we hope that they will encourage the sharing of information between local authorities so that all will consider what needs to be done in their authority to ensure that their strategy delivers accessible, safe play that allows children and young people to develop their full potential.

We would hope that all the play strategies will be finalised, ratified and implemented before the end of 2008. When we distribute this report to local authorities, we will be asking them to send us a copy of their final play strategy and we will keep a note of those received.

From September 2008 local authorities are required, for the first time, to publish their single CYPP. We anticipate a busy period while we look at these important documents. Inclusion of play for all children and young people in the plans will certainly be a priority for us.

As part of our monitoring role, we intend to review the progress made in every local authority following the feedback that we have provided. We also expect that by looking at the single CYPPs will indicate whether play is seen as a priority and whether play strategies are incorporated and given sufficient recognition.

At the time of writing, consideration is being given to our future work programme and because of the importance of this issue to children and young people we will be considering ways forward — possibly working in partnership with others concerned or expert in this field — to keep the issue high on the agenda.

Appendix

Letter to local authorities

25th June 2007

Dear

The Children's Commissioner for Wales' review of disabled children's access to play facilities in local authorities in Wales

In accordance with the regulations accompanying the Children's Commissioner for Wales Act 2001, we have sought the views of children as to how the Commissioner should exercise his or her functions and as to the content of the Commissioner's annual work programme by means of a series of participation events across Wales in 2006. Children and young people prioritised the issue of disabled children's access to play and leisure facilities and mandated the Children's Commissioner to undertake a review into this.

We have also taken account of the key findings of the recent report of the Welsh Assembly Government's Equality of Opportunity Committee "Why is it that disabled young people are always left until last?" which considered the provision of services for disabled young people.

In the first instance the review will focus on the play strategies of all 22 local authorities in Wales to identify to what extent they seek to provide play and leisure opportunities for disabled children and young people. Each local authority will be asked to provide a copy of their play strategy. A framework of criteria has been constructed against which the analysis may be conducted.

There may be elements within the play strategy where we may appreciate further discussion, clarification or amplification. We would be grateful, therefore, if you would nominate an officer with whom we may make contact for further discussion as necessary or required.

At the same time, and in parallel, we will work with disabled children and young people, in order to better understand their experiences of accessing play activities in Wales today, and to be able to reflect their views within this review.

At the end of the review, a written report will be produced and feedback provided to each of the 22 local authorities. It is our expectation that the report will be published in late September 2007 and will be shared with the Commission for Equalities and Human Rights (CEHR) in Wales. It will also be made available to Welsh Assembly Government, Play Wales, Funky Dragon and other organisations as well as the general public through our website.

An appropriate version of the report will also be published for children and young people.

Action required by 27th July 2007:

- Please send a copy of your local authority play strategy or equivalent document to play@childcomwales.org.uk.
- Please send (by email to play@childcomwales.org.uk.) the nominated officer's contact details as below:

Name:

Job Title:

Telephone No.:

Email Address:

For both practical and environmental reasons, we request that all materials and correspondence are sent by email in electronic format.

If you anticipate any problems or difficulties in providing the information requested, or would like further information about this process, please contact me or any member of the Policy and Service Evaluation Team on 01792 765600 to discuss the matter.

Yours sincerely,



E. Rhian Davies

Assistant Commissioner, Policy and Service Evaluation
Children's Commissioner for Wales