



**PLAYBOARD'S RESPONSE to the Delivering Social Change for
Children and Young People**

March 2014

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1.0 INTRODUCTION

- 1.1 PlayBoard is the lead organisation for the development and promotion of children and young people's play in Northern Ireland. We are a membership organisation and our vision is of 'a society where the right to play is realised'. We exist to promote and support the child's right to play as a fundamental human right, consistent with Article 31 of the United Nations Convention on the Rights of the Child (UNCRC).

PlayBoard's work is underpinned by the 'Playwork Principles' which provide a professional and ethical framework for playwork practice. The principles outline the unique nature of play and playwork and are based on the recognition that Children and Young People's capacity for positive development will be enhanced if they are given access to the broadest range of environments and play opportunities. Children and young people's views, aspirations and perception of themselves and the environment in which they live are at the heart of PlayBoard's work.

2.0 OVER-ARCHING COMMENTS ON THE CONSULTATION DOCUMENT

- 2.1 PlayBoard's response to the Delivering Social Change (DSC) for Children and Young People consultation is based on our learning from direct work with children and young people; primary and secondary research; policy and advocacy work and the resultant campaigns that have been taken forward by the organisation since its establishment in 1985.
- 2.2 PlayBoard welcomes this opportunity to respond to the DSC consultation. Childhood, as a conceptual timeframe is quite straight forward, however as research outlines, childhood is in fact one of the most complex and contested social concepts. We therefore recognise from the outset the complexity of the issues faced by the department in attempting to bring together 3 key areas i.e. 'Improving Children's Life Chances: The Child Poverty Strategy', 'Our Children and Young People our Pledge – A 10 year Strategy for Children and Young People' and the obligations contained within the United Nations Convention on the Rights of the Child (UNCRC).
- 2.3 We also welcome the Department's stated intention of ensuring that the strategy is 'informed by the views of children and young people, their families and those who work with them'. We accordingly welcome the extension period for consultation responses; however do feel that whilst this offered an extended time frame for children and young people to input into the process, the limited overall time available did reduce the opportunity for more focused participation in the consultation process.

We do acknowledge the department's recognition during the consultation extension period of the need for a focused consultation event with children and young people. Further, we welcome the departments support for the consultation event which took place on 22nd March 2014 which saw 70 children aged between 4 and 12 taking part in a consultation morning facilitated by PlayBoard. As part of this response, and acknowledging that a

more detailed report of the event will be produced for the department, we have sought to capture a flavour of the key issues raised by the children and young people who attended the event.

- 2.4 Providing the questions as a guide has been helpful. PlayBoard have decided to take an open-ended approach as this better affords us the opportunity to unpick the 'how' of the consultation document and in doing so to contribute more effectively to the desired elimination of child poverty.
- 2.5 At the outset of this response we would like to make a number of overarching comments relating to the consultation document:

1. **Language** – We note that throughout the document there is a lack of consistency with regards to the use of the terms 'children' and 'children and young people'. For example, the vision references 'children' whilst outcomes 5 and 6 refer to 'children and young people'. PlayBoard suggest that the language used should be consistent throughout, referring to 'children and young people' or, if 'children' is to be used that a definition clarifying the term as consistent with the definition used in the UNCRC be made clear at the outset of the document.
2. **Vision** – The vision outlined within the consultation document reads:

"That all children have the support and nurturing required to allow them to have a healthy, safe and active childhood and have access to good quality education, which will provide them with the skills to gain employment and fulfil their potential as active, engaged citizens"

In developing a vision to deliver social change it is important that the aspirations for childhood contained within it should aim high and express a set of conditions, standards and principles that we should strive to achieve for all children young people and not just a majority.

PlayBoard feel that the vision as currently outlined is restrictive and excludes one of the key elements of childhood, that of the fun and enjoyment that comes from new experiences, social interactions and personal development.

PlayBoard suggest that the vision could be enhanced through recognition of the importance of enjoyment in childhood, for example "That all children *and young people* have the support and nurturing to allow them to have a healthy, safe, *enjoyable* and active childhood...."

We would echo the view outlined in CiNI's response (page 8) that the vision "*implies children are a unit of economy rather than children and young people who should be enjoying a happy, healthy and fulfilled childhood*". To view the primary focus of childhood as a route towards economic productivity within the workforce is extremely limiting and ignores the range of opportunities which exist for children and young

people as they develop towards adulthood. Given the limited focus within the vision we would suggest that it should be reviewed with the aim of better reflecting the full range of positive opportunities which exist for children and young people as they mature towards adulthood.

3. **6 high level outcomes** – recent informal discussions with OFMDFM officials have established that departmental thinking for the outcomes is underpinned firmly on a rights based approach.

Having considered the articulation of the 6 high level outcomes identified within the document we do feel that action needs to be taken to address a number of areas of ambiguity:

- Whilst acknowledging the need for targeted action to meet the needs of individual groups e.g. children in poverty, we do feel that outcome 2 as currently articulated reads as a target rather than an outcome.

All children and young people have the right to expect good educational outcomes; we therefore suggest that the outcome should be reworded "All children and young people have good educational outcomes". Once the final strategy has been agreed we suggest that a specific target be introduced focusing on the educational needs of children in poverty.

Furthermore, if the purpose of the strategy is to alleviate poverty it is important that it embraces a wider brief than education, by way of example poverty of essential childhood experiences i.e. play, recreation, leisure pursuits etc.

- Echoing point 1 above, there is a lack of consistency across the outcomes with regards to language used to define target groups i.e. outcomes 2, 3 and 4 refer to children, whilst outcomes 5 and 6 refer to children and young people;
- We would fully endorse the comment made by CiNI in their response to the consultation (see page 7) regarding the UNCRC. With specific focus on the outcomes, currently adherence and delivery of the UNCRC is articulated as being one of the 6 outcomes within the framework. The UNCRC should be the overarching framework within which the strategy sits as opposed to being one of the 6 outcomes.

4. **Signature Projects** - PlayBoard welcome the Signature Projects under the Delivering Social Change framework as recently outlined by the Office of the First and Deputy First Minister. With a view to maximising impact, and in keeping with the cross-departmental ethos which lies at the heart of the programme, we would urge the Executive to establish a statutory or

legal obligation to co-operate between departments to optimise the discernable effectiveness of the DSC framework.

Given that Signature Projects are subject to short term funding, we would strongly urge the Executive to ensure that sustainability strategies and robust evaluation mechanisms are put in place from the outset to ensure that programme learning is captured with a view towards scaling-up on a wider basis.

PlayBoard particularly welcomes the seventh signature programme which aims to enhance play and leisure opportunities for children and young people.

5. ***Outcome Based Accountability approach*** - We commend the department's commitment to utilising an Outcomes Based Accountability (OBA) approach as the basis for driving the DSC process. Acknowledging that the indicators identified within the document are only indicative at this stage, we would make the point that the indicators as currently identified within the document would not in our opinion provide an adequate test to measure the extent to which the outcome has been met.

Given the willingness and commitment of the Department to develop the best possible strategy for children and young people we would seek the incorporation of additional indicators in order to provide a more accurate reflection of how children and young people's lives are developing.

We are conscious of work commenced through both the Children and Young People's Strategic Partnerships (CYPSP) and the National Children's Bureau and would suggest that the department consider a review of their existing datasets as a starting point for reviewing indicator sets. It will also be important to acknowledge emergent areas for data development in order to ensure that these are taken into consideration at future planning stages.

5. ***Early Stage Intervention*** - We welcome the emphasis on early stage intervention within the consultation however, we would urge the Department to place a similar focus on prevention, which although mentioned in the document, does not receive the weighted importance it deserves.

We welcome the commitment to ensuring that DSC 'will be firmly evidence based' however we would urge caution about using this term and suggest using the term evidence-informed.

Commentators have highlighted that for a programme to be evidence-based it must demonstrate at least one randomised controlled trial or two

quasi-experimental evaluations¹. Such an approach may not always be appropriate. We would agree with the comments made with regards to this area by Youthnet in their submission (see page 9).

3.0 Outcomes Based Accountability Approach

- 3.1 In principle PlayBoard welcomes the proposition to build on the work of the Child Poverty Outcomes Framework NI and to pursue an Outcomes Based Accountability (OBA) approach.

We do feel that if the OBA approach is to underpin the delivery of the DSC Strategy, further work will be required across the children and young people's sector in order to embed the theory base and methodology. Having adopted this approach across PlayBoard we would agree with CiNI's observation in their response that *'the consultation document oversimplifies the process of OBA, limiting its effectiveness'*.

- 3.2 We particularly welcome the Department's key first action on page 25 to use further consultation and engagement with stakeholders to continue to develop the draft scorecards set out for each of the six proposed outcomes.

4.0 Outcome 1: Families have adequate incomes and work that pays

CiNI's "view is that this policy dilutes the Child Poverty Strategy. The stated purpose of the Child Poverty Act 2010 is to 'define success in eradicating child poverty and create a framework to monitor progress at a national and local level'. It sets out in legislation a requirement to meet four child poverty targets by 2020. At no point within the Delivering Social Change Strategy document does it talk about eradicating child poverty.

Crucially, while the programmes can be seen as central to delivering on the Programme for Government, the issue of dealing with the underlying problems of child poverty appears as less of a priority. The issue of using short term funding to drive change which is long term needs addressed, the funding for the signature projects highlighted within the Strategy are time-limited."

- 4.1 *Story behind the baseline* states that 'Children in poverty are more likely to: suffer more from poor health; get involved in alcohol, drugs and crime; and not do as well in school'.

PlayBoard would urge the Department to recognise the protective factors play can provide in children's lives. As a priority the benefits of play need to be promoted to parents from before birth; schools should be encouraged to recognise the benefits of play at break-time and within the curriculum; and the benefits of play should be articulated to communities to address negative stereotyping of children and young people. Play has a critical role in helping to alleviate the likelihood of poor health, help prevent involvement in alcohol,

¹ Allen, G. (2011). Early intervention: the next steps, an independent report to Her Majesty's government by Graham Allen MP. The Stationery Office, p135.

drugs and crime and develop a love of learning that is so critical do doing well in school².

The importance of play in promoting healthy children and young people is set out in the Northern Ireland Executive's 'Fitter Futures for All' framework which aims to empower the population of Northern Ireland to make healthy choices, reduce the risk of overweight and obesity related diseases and improve health and wellbeing, by creating an environment that supports and promotes a physically active lifestyle and a healthy diet'.

The Fitter Futures for All Framework highlights the importance of green spaces, urban design and planning to enable physical activity and to prevent obesity. Children with lower socio-economic status are noted as tending to participate less in formal leisure-time and are on average more physically active in everyday activities such as unstructured play.

4.2 PlayBoard welcome the Department's acknowledgement in the *What works to do better?* section, of the importance of Accessible and Affordable Childcare in the areas of school age childcare, rural provision and better information about childcare options. We also welcome the first key actions set out on p27, which incorporates the roll-out of Bright Start³.

4.3 At PlayBoard's consultation event on 22nd March, children were afforded an opportunity to express their views in relation to each of the 6 outcome areas. With regards to outcome area 1, children told us:

<p>That living in poverty means ...</p> <ul style="list-style-type: none">• Having no money• Being poor• Not having nice things• Not having heat in your house <p>the causes of poverty for families are ...</p> <ul style="list-style-type: none">• not having money/enough money• not having jobs/good jobs• wasting your money on the wrong things
<p>Do you have ideas about what government could be doing?</p> <ul style="list-style-type: none">• Give them money• Make more jobs
<p>Other comments included:</p> <ul style="list-style-type: none">• I think the government should make more money for factories for jobs

² Ginsburg, K. R. (2007). The importance of play in promoting healthy child development and maintaining strong parent-child bonds. *Pediatrics*, 119(1), 182-191.

³ OFMDFM (2013). BRIGHT START The NI Executive's Strategy for Affordable and Integrated Childcare A Strategic Framework and Key First Actions. Belfast: OFMDFM. Available at: <http://www.northernireland.gov.uk/bright-start-strategic-framework-key-actions.pdf>

- I think the government should get jobs for people in our area, and new skills so they can earn more money
- I think the government should build buildings for jobs
- I think government should give more money to the poor
- I think government should make sure poor people get good jobs
- I think government should give parents more wages
- I think government should give parents more money for childcare
- I think the government should give children more help in school
- I think the government should help children
- I think government should create more money and more jobs

5.0 Outcome 2: Children in poverty achieve good educational outcomes

As previously outlined, outcome 2 appears to be articulated more as a target than an outcome. At present the outcome suggests that only children in poverty should achieve good educational outcomes, while given the overarching reach of the strategy, all children and young people should be achieving good educational outcomes. There is a need for a broader set of indicators to reflect all children and young people's desire to achieve anything they value or that will enhance their life chances.

Within the 10 year strategy the expressed outcome was enjoying, learning and achieving. As an organisation which lobbied for the delineation of the 3 elements (enjoying, learning and achieving) we are concerned that within the current document the focus appears to have shifted almost wholly towards the learning aspect.

- 5.1* Outcome 2 is mostly expressed within the indicator set 'proportion of school leavers achieving 5A* - C GCSE (including English and Maths)'. Whilst acknowledging the importance of educational attainment, education alone is not sufficient for delivering the range of experiences which support emotional, physical and psychological growth and development.
- 5.2* The *Contributory Factors* identified are economic social and cultural deprivation; lack of parental engagement, poor school leadership and poor attitudes to education. PlayBoard would urge the Department to recognise and promote the benefits of Play in accordance with the prescriptions of General Comment 17 as a mechanism for lessening the impact of the identified contributory factors.
- 5.3* *What works to do better?* PlayBoard welcome the Department's emphasis on 'Early Years/Early (Stage) Interventions' and in particular the acknowledgement of the need to improve childcare services, pre-school education, early years provision and parental involvement in the child's education.

The period of life from pre-birth to the end of Foundation Phase (0 to 7 years of age) is a critical part of childhood; a time children should be able to enjoy as they grow, develop, play and learn in a safe and nurturing environment. Northern Ireland's statutory Foundation Stage curriculum is clear that self-initiated play helps children to understand and learn about themselves and their surroundings⁴. Indeed play underpins the learning at the Foundation Stage and continues to have a role throughout Key Stages 1 and 2.

PlayBoard welcome the emphasis on prevention and early intervention but are concerned that the mid-childhood stage of development (7-8 years through to adolescence) has been overlooked. We would strongly advocate that the focus should be on Early Stage Intervention with sustained, follow-on interventions for children in the mid-childhood and adolescent stage. In this regard we would highlight the added-value that Play brings to the lives of children throughout their childhood.

5.4 Key First Actions: We broadly welcome the actions identified. In particular we welcome a training programme to improve and enhance skill across the childcare (and we would suggest including the terminology playwork or children services) workforce.

PlayBoard has concerns about the strong emphasis on educational attainment set out in 1.1 – 1.4 of the Key First Actions (p29), which we fear may come at the expense of article 31 rights. General Comment 17⁵, paragraph 41 is very clear about how increasing educational demands are reducing the time available for the enjoyment of these rights.

41. Pressure for educational achievement: Many children in many parts of the world are being denied their rights under article 31 as a consequence of an emphasis on formal academic success. For example:

- *Early childhood education is increasingly focused on academic targets and formal learning at the expense of participation in play and attainment of broader development outcomes;*
- *Extracurricular tuition and homework are intruding on children's time for freely chosen activities;*
- *The curriculum and daily schedule often lack recognition of the necessity of or provision for play, recreation and rest;*
- *The use of formal or didactic educational methods in the classroom do not take advantage of opportunities for active playful learning;*
- *Contact with nature is decreasing in many schools with children having to spend more time indoors;*

⁴ CCEA (2007). The Northern Ireland Curriculum Primary. Belfast: CCEA Available at:

http://www.nicurriculum.org.uk/docs/key_stages_1_and_2/northern_ireland_curriculum_primary.pdf

⁵ United Nations Committee on the Rights of the Child (2013). General Comment no. 17, on the right of the child to rest, leisure, play, recreational activities, cultural life and the arts (art. 31) (CRC/C/GC/17), United Nations, Geneva, Switzerland. Available at: http://www.playboard.org/uploads/CRC-C-GC-17_en.pdf

- *Opportunities for cultural and artistic activities and the provision of specialist arts educators in school are, in some countries, being eroded in favour of more academic subjects.*
- *Restrictions on the type of play in which children can engage in school serve to inhibit their opportunities for creativity, exploration and social development.*

There is a growing body of research evidencing the benefits of play throughout the school day. A randomized controlled trial⁶ conducted by Mathematica Policy Research and the John W. Gardner Centre for Youth and Their Communities at Stanford University examined how investing in recess and organized play through the 'Playworks' programme benefited both teachers and students during the school day. The study found that Playworks improved student outcomes in four domains: 1) school climate, 2) conflict resolution and aggression, 3) physical activity, and 4) learning and academic performance.

The Paediatrics journal⁷ recently published an article supporting the importance of recess as a necessary break from the classroom and highlighted the importance of safe and well-supervised recess for cognitive, social, emotional, and physical benefits. In conclusion the American Academy of Pediatrics was unequivocal that recess is a crucial and necessary component of a child's development and should not be withheld for punitive or academic reasons.

5.5 At PlayBoard's consultation event on 22nd March, children were afforded an opportunity to express their views in relation to this outcome area:

There was wide consensus that education was important:

- So that when you are older you can get more money;
- Important to get into a good school;
- Helps you to support your family if you decide to have one when you leave school;
- School is important because it creates really important memories for childhood; and
- To get a good job

When asked what else is important the overwhelming response was:

- More fun;
- More PE; and
- More art.

When asked what government could be doing, responses included:

⁶ Bleeker, M., James-Burdumy, S., Beyler, N., Dodd, A. H., London, R. A., Westrich, L., ... & Castrechini, S. (2012). Findings from a Randomized Experiment of Playworks: Selected Results from Cohort 1. Mathematica Policy Research, Inc. Available at: <http://files.eric.ed.gov/fulltext/ED531230.pdf>

⁷ Murray, R., Ramstetter, C., Devore, C., Allison, M., Ancona, R., Barnett, S., ... & Young, T. (2013). The crucial role of recess in school. *Pediatrics*, 131(1), 183-188.

- Maybe like a little bit more fun and less work;
- Playground having more swings, slides and climbing frames;
- Free School Dinners for everybody;
- I think you should always have a good chance to go into a very good school not because of a thing you got in one single test;
- More subjects;
- Be more interesting;

6.0 Outcome 3: Children and families thrive and have a healthy future

As noted by CiNI in their response "*...this outcome places too great an emphasis on a medical model approach rather than a holistic, integrated early intervention, emotional and well-being whole child model. The document does not address sufficiently other key factors to improving the health and well-being of ALL children and young people.*" PlayBoard would be in agreement with this statement.

The Children and Young Peoples Strategic Partnership has (CYPSP) spent some considerable time and resource in working towards the development of partnership based structures aimed at delivering improved health and wellbeing outcomes for children and young people. We would suggest that the inclusion of a more formal linkage with the CYPSP could enhance the Delivering Social Change Strategy document.

6.1 *Indicator 2: Proportion of primary one pupils who are obese*

We welcome recognition of the importance of play in addressing growing levels of obesity amongst P1 pupils. If we are to successfully 'turn the curve' within this area action will be required in order to:

- Increase parental understanding of the importance of play and its role in tackling obesity and enhancing physical growth and development at pre and post natal stage;
- Enhance levels of access to 'free play' opportunities at community level, encouraging outdoor physical play as a means of enhancing health, wellbeing and supporting the development of essential motor skills;

Given the recognition of play's role in tackling obesity within the Fitter Futures for All⁸ framework, and the recent announcement of a £1.6 million investment in play and leisure through the DSC framework, an opportunity exists to develop clear actions which can help to reverse the growth in early childhood obesity.

6.2 *Indicator 3: Crude Suicide Rate (deaths per 100,000 populations)*

The *Implications of Indicator 3* state that 'by tackling deprivation we will help to address many of the underlying issues which contribute to poor mental

⁸ DHSSPS (2012). A FITTER FUTURE FOR ALL Framework for Preventing and Addressing Overweight and Obesity in Northern Ireland 2012 – 2022. Belfast: DHSSPS Available at: <http://www.dhsspsni.gov.uk/framework-preventing-addressing-overweight-obesity-ni-2012-2022.pdf>

health outcomes including suicide in the most deprived areas’. The need to examine the cause of the underlying issues will be critical to reducing inequalities. The 2011 Marmouth Report 2011⁹ States:

"Giving every child the best start in life is crucial to reducing health inequalities across the life course ... To have an impact on health inequalities we need to address the social gradient in children's access to positive early experiences."

- 6.3 *What works to do better?* Under the early intervention section, the Department acknowledge the need for parenting programmes. General Comment 17 highlights that *'adults often lack the confidence, skill or understanding to support children's play and interact with them in a playful way'*. PlayBoard welcome the focus on parents, would encourage the promotion of play as a central component of parenting programmes and highlight the importance of shared play in encouraging parental involvement in children's lives¹⁰. With a view to supporting parents, PlayBoard would encourage the development of targeted antenatal health promotion activity to message the benefits of play from the perspective of both physical and mental health and wellbeing.
- 6.4 We welcome the acknowledgement of the critical role of Play in the key first action listed on p32 and would highlight the positive role a play based approach could have if applied across a range of the key actions including 3.5, 3.6, 3.7, 3.8, 3.9 and 3.10.
- 6.5 At PlayBoard's consultation event on 22nd March, children were afforded an opportunity to express their views in relation to this outcome:

There was wide consensus that play helped children to be healthy:

- Great exercise
- You don't get fat
- Keep you alive

Only half of the children felt the people where they lived are healthy and happy and noted

- Some don't have healthy diets
- Don't do exercise

Do you have ideas about what government could be doing:

- Less sugar in foods
- More playgrounds
- More free activities for adults
- Encourage people to eat healthy
- Make sweets and chocolate more expensive

⁹ Marmouth Report (2010). Fair Society Healthy Lives Full Report Available at:

<http://www.instituteofhealthequity.org/Content/FileManager/pdf/fairsocietyhealthylives.pdf>

¹⁰ Ginsburg, K. R. (2007). The importance of play in promoting healthy child development and maintaining strong parent-child bonds. *Pediatrics*, 119(1), 182-191.

- More physical activities in school
- More play parks that you can walk to

7.0 Outcome 4: Children and families live in a safe and secure environment

The environmental conditions in which children and young people live have a significant impact on their lives, influencing childhood experiences and impacting on their general health and well-being. A safe and secure environment not only supports individual growth and development but also helps to promote positive community identity and a sense of pride and belonging.

Over the past 5 years, PlayBoard have been involved in a number of projects focused on the environment and how it impacts on the child's right to play. Work carried out within the Shankill area of Belfast highlighted the difficulties faced by children in using the play spaces which were available to them within the community.

On-going environmental assessments carried out by a group of local children highlighted that play spaces were often unusable due to poor maintenance, broken glass, dog mess and other environmental conditions which led to risk of illness or injury. The simple provision of space for play within communities is therefore not enough; it must be maintained and kept in a manner which enables children and young people to avail of play opportunities in a safe environment.

We would highlight the need to expand the indicators within this outcome. It is evident that the indicators used skew the focus away from children and young people and do not in our opinion lead to a fair and balanced view of what children and young people experience, or indeed should experience in order to live in a safe and secure environment

7.1 *Indicator 2: Number of child admission to hospital due to an accident in the home or on the road*

The contributory factors identified for indicator 2 include:

- A lack of safe places to play;
- Poor supervision; and
- A lack of safety education/awareness

For many children and young people, particularly those living in urban areas, opportunities for outdoor play have become increasingly limited due to the levels of, and the priority given to road traffic.

Within the recently announced signature project for play, an opportunity exists to introduce new and innovative approaches to delivering play more

effectively and safely within communities. Through the Torrens area 'Reclaiming Street Play Project' PlayBoard were able to demonstrate how streets within urban areas could be closed off to traffic for an agreed period each week to create a safe street play zone.

More recently, PlayBoard's 'CAN Play' programme demonstrated how with support and guidance communities could become key partners in supporting an opening up of safe play spaces within communities. PlayBoard are currently refining the 'CAN Play' model based around the development of a cohort of trained 'Play Volunteers' who can support safe, free play within their own community.

- 7.2 *Lack of safety education/awareness:* From a play perspective, there is a need to achieve a balance between protecting children from injury through risk by restricting the play experience and recognising that risk in play can bring developmental benefits which, if removed completely can inhibit skills development.

The recently updated version of the Managing Risk in Play Provision: Implementation Guide¹¹ was launched in Westminster in October 2013 and includes the joint high level statement endorsed by the Play Safety Forum and Health and Safety Executive.

The guide demonstrates how play providers can develop an approach to risk management that takes into account the benefits to children and young people of challenging play experiences, as well as the risks. The guide is written for those responsible for managing play provision, especially unstaffed public play areas, and for those involved in designing and maintaining such provision. We would urge the department to recognise the importance of achieving a risk/benefit balance in approaching the issue of safety in play as opposed to a risk averse approach.

- 7.3 At PlayBoard's consultation event on 22nd March, children were afforded an opportunity to express their views in relation to outcome 4:

When asked what they liked/didn't like about their community, comments included;

- I do not like the cars and traffic;
- I like school and [the afterschool club] and shops too;
- I like the [afterschool club] because we get to Play and go on trips;
- Ban drug dealers. Make sure no drugs are being sneaked into drinks;
- I don't like it because there is not a park and we have to drive to get to one. I like that we don't have to go far to get to school; and
- It's dangerous to play on the road.

When asked if they feel safe in your community – the family and school

¹¹ Ball, D., Gill, T., & Spiegel, B. (2012). Managing risk in play provision: Implementation guide. Available at: <http://www.playengland.org.uk/media/172644/managing-risk-in-play-provision.pdf>

featured strongly

- I have a good family and house
- I feel safe at school and my home

When asked if they had somewhere to go out and play responses ranged from the garden, street, fields and local parks.

Do you have ideas about what government could be doing:

- Reduce teenagers that drink and drug dealers;
- Less glass on paths, slow down cars;
- Re-open our police station;
- Make footpaths;
- Give us money to buy houses and parks to play in; and
- More street lights and cameras.

8.0 Outcome 5: Children and Young People contribute positively to community and society

We know from evidence¹² gathered over a number of years, that children and young people's often feel alienated and even 'unwanted' within their communities. Many report a lack of positive interaction with adults and highlight an undercurrent of negative stereotyping with play and leisure activity often labelled as being anti-social.

- 8.1 Whilst the right to have a say in the decisions which impact upon their lives is central to the UNCRC, the experience of many children and young people would suggest that their views are rarely, if ever sought, and where they are sought they are largely ignored.

Where given the opportunity, children and young people can make valuable and imaginative contributions to local decision making, and it is important that this is enshrined within the DSC framework. PlayBoard welcome recognition of the need to 'Involve children in their communities/decision making' and would highlight the need to embed true participation (not just consultation) as being a key component of delivering change.

- 8.2 As an example of children and young people actively driving change we would highlight the work of PlayBoard's Young Research team. During 2013 PlayBoard established a team of Young Researchers aged 8 to 12 years old and supported them to become young peer researchers with a focus on their 'Right to Play'.

Engaging with other children and young people from across Northern Ireland the young researchers explored what children and young people thought about play and the right to play, whilst also examining what prevented children from playing within their communities.

¹² "PlayScapes at 16: Revisited" An extended report of the findings of the 2010 YLT survey Dirk Schubotz and Roisin McCooey - <http://www.playboard.org/uploads/PlayScapes%20at%2016%20Revisited.pdf>

The Questions	The Findings
Favourite things to play	<ul style="list-style-type: none"> • Traditional street and play-ground games; • Football (soccer) is the most popular sport and was more popular than Xbox or PlayStation.
Where do you play?	<ul style="list-style-type: none"> • The street is the place where children play most; • Children also play in parks and playgrounds, some in their gardens, at after-school clubs and in the school playground.
When do you play, and who do they play with?	<ul style="list-style-type: none"> • Most children say they play every day after school; • Most children say they play with friends; • Others play with brothers and sisters or neighbours; • A few said they play by themselves or with their iPad or tablet.
What stops you playing	<ul style="list-style-type: none"> • Rain or bad weather is the main problem that stops children playing outside; • Too much homework - it takes up too much time. • Traffic can stop children playing and can cause accidents; • Fighting or rioting can be a problem as it makes it dangerous to play outside (but there are some children who want to go to the riots, as for them it is fun and exciting). • Some parents can be over-protective; and • Often children are grounded as a punishment.
What happens when children can't play	<ul style="list-style-type: none"> • Children can feel angry or annoyed, sad or lonely, upset or crying; • Children become depressed and lonely.
Playing outside	<ul style="list-style-type: none"> • Most children said they are allowed to play outside whenever they want; • Some said they have to finish their homework first; • Some children said they can only play outside sometimes - most of these were younger children; • Overall, children want to play outside more than they are allowed to.

The group's research culminated in the development of an easy to understand version of General Comment 17 and a poster on the challenges of making the right to play a reality for children and young people in Northern Ireland.

8.3 At PlayBoard's consultation event on 22nd March, children were afforded an opportunity to express their views in relation to outcome 5:

There was consensus that it is important to give something back to your community:

- It's extremely important to give back to your community because

they've probably done so much for you;

- We should buy food every day in the shops so they don't close;
- Yes I think it is good because helping others is kind.

Getting a job after school was seen as important:

- So you can get a good job and get a good house for our family;
- Because you need money to buy food.

Thoughts on how things could be improved:

- I think in my estate I would love a park;
- Make a play area in my estate;
- More parks, more houses, more schools and more places to play without cars;
- Money for childcare and staff;
- More after school and playgroup clubs;
- Make the streets nicer;
- Give more money because some people are poor.

When asked why do you think some people don't work, responses included:

- Because they are lazy;
- They are so sad from school they don't want a job;
- They have children to take care of;
- I think so their children can come home from school and their parents will be there to look after their children;
- There are no jobs left;
- Maybe they are sad because they didn't get qualifications and now they can't get jobs.

9.0 Outcome 6: Children and young people live in a society which respects their rights

Establishing a society which respects children's rights should be the central aspiration of the DSC Strategy and should therefore in our opinion sit at the core of the outcomes framework.

Children are not merely passive recipients, they are entitled to rights, and they are entitled to be involved in those decisions that affect their lives. Under UNCRC obligations associated with article 12 the Executive has a duty to promote the voice of the child; as well as making the voice of the child integral to service design, planning, delivery and evaluation.

- 9.1 PlayBoard would highlight that some children and young people face a multiplicity of issues which impact upon their lives across a range of rights based areas including disability and ethnic background. It is important that in rolling out the DSC strategy the department recognise the need to listen to the particular needs those children and young people who can easily become isolated and invisible within our society.

We recommend the Executive utilises the tools already available to ensure children’s participation is measured and improved upon. Areas which should be identified and measured include legal entitlements to participate; measuring the right of access to information; measuring awareness raising on children’s civil rights; measuring opportunities to influence agendas; and measuring respect for children’s participation in their everyday lives.

- 9.2 PlayBoard fully endorses the actions set out in the set out in the ‘*What works to do better?*’ section of the document and would strongly advocate for the incorporation of the UNCRC into domestic law.
- 9.3 In line with many sectoral colleagues, PlayBoard would welcome an Annual Report detailing how Northern Ireland is progressing on its UNCRC commitments. This would provide an opportunity for the Executive to take a pro-active approach to realising children and young people’s right and would establish a firm basis for measuring progress towards full implementation.
- 9.4 PlayBoard fully endorses the key first actions 6.1 - 6.5 (p39). Full implementation of these actions would be a first step towards achieving delivery of outcome 6.
- 9.5 At PlayBoard’s consultation event on 22nd March, children were afforded an opportunity to express their views in relation to outcome area 6:

Having a voice, being listened to and being able to play featured strongly

- We should be listened to;
- We should have rights to talk out;
- We have a right to play;
- Get more special education teachers;
- Children should get to see the doctor faster;
- To learn at school;
- To help make decisions;
- To listen to great teachers.

Do you have ideas about what government could be doing:

- We should let more people know about their rights;
- The government should give us more money for more toys to play with, more games to play with and more play time;
- LISTEN TO US, MAKE DECISIONS;
- We’re small but MIGHTY WE HAVE THE RIGHT TO SPEAK OUT AND EXPRESS OURSELVES;
- I think people should make more parks in our community;
- Get more after school because it’s nice to have them and it’s easier for the parents.

Other notable comments included:

- We should get more playtime and outdoor time in school because we need fresh air and exercise;
- We should get school nurses and some therapy teachers (in case of

anger issues and craziness);

10.0 Concluding Comments

Developing a strategy to meet the myriad issues which impact on the lives of children and young people is challenging, and in recognising those challenges we welcome the publication of the DSC consultation as a first step towards addressing those issues.

We acknowledge that much work remains to be done, and we welcome the department's willingness and desire to work with the children and young people's sector to identify additional actions and indicators to drive the DSC agenda.

At its core, there do however remain some key issues which need to be addressed if we are to achieve the type of change which is necessary across Northern Ireland. Central is the need to ensure that the strategy is focused on meeting the needs of *all children and young people* and not a subset of the population. Also, whilst we welcome the use of the Outcomes Based Accountability approach, we feel that more work will be required if the approach is to be truly embedded within the DSC framework, across government and within the wider voluntary sector.

The commitment shown by the Northern Ireland Executive through the DSC signature projects is to be commended. PlayBoard in particular welcome the allocation of £1.6m to the Play and Leisure Signature project as providing an opportunity to enhance children's access to play opportunities in line with UNCRC article 31. Recognising the short term nature of the investment available, we would strongly advocate for the implementation of an effective evaluation process to ensure that learning can be captured to support future 'scaling up' of signature projects.

With regards to the issue of statutory duty, we would highlight the Welsh Executives experience in introducing play sufficiency measures across local government. We would encourage the Executive to explore the approach adopted in Wales with a view to assessing the applicability of such an approach in Northern Ireland.

Given the potential impact of the strategy on the lives of children and young people we would highlight the importance of building and maintaining effective participative structures with children and young people as the strategy develops.

Children and young people account for 27% of the population in Northern Ireland, and the right to have a say in the decisions that impact upon them is central to the realisation of the rights enshrined within the UNCRC.

We would urge the Department to ensure that in further developing the strategy children and young people are given a range of participative opportunities to feed into and ultimately shape the emerging strategy. The children and young people sector, through the Big Lottery Funded 'Big Deal'

initiative established a number of participative approaches which may be of interest to the department as it seeks to progress thinking.

Finally, we would strongly advocate for a recognition across the DSC strategy of the four core principles of the UNCRC that underpin all other rights, namely non-discrimination (article 2), best interests of the child (article 3), survival and development (article 6 and respect for the views of the child (article 12). Whilst recognising the centrality of the four core principles references, we would also highlight the interdependence and indivisibility of the articles contained within the UNCRC. As a society we cannot ensure some rights without or indeed at the expense of other rights. Only by delivering against all of the articles contained within the UNCRC will we as a society tackle the broad range of issues which impact on the lives of our children and young people.

APPENDIX A

THE IMPORTANCE OF PLAY WITHIN DELIVERING SOCIAL CHANGE

PlayBoard is a rights based organisation and we believe unconditionally in the importance of the rights of the child as set out in the UNCRC. PlayBoard campaigns and advocates for children and young people's rights under Article 31 and alongside other organisations and individuals in Northern Ireland for other articles of the UNCRC.

By signing up to the UNCRC in 1991, the UK government committed itself to working towards the realisation of the rights of children set out in the CRC.¹³ This means that implementing the CRC in and through law is an obligation which must be taken seriously¹⁴.

It is PlayBoard's position that a key objective of the Executive should be to develop children's rights legislation, encompassing both direct incorporation of the CRC and supportive measures of implementation.

Given that the Executive is keen to deliver on its commitments under the UNCRC we would strongly urge careful examination of possible ways to implement children's rights through legal measures, which would ultimately support the Executive in realising its obligations under international human rights law in relation to children and young people (see Byrne and Lundy, 2013).

These options could ideally be included in a comprehensive children's rights statute or they might be implemented on an ad hoc basis when opportunities present themselves¹⁵.

Article 31 of the UNCRC underpins PlayBoard's existence. The release last year by the UNCRC of General Comment 17 is a very important milestone for article 31 and sets out what the Executive has to do as a duty bearer to realise its article 31 obligations, including those in relation to poverty, clarifying for governments worldwide the meaning and importance of Article 31, the child's right to play. The general comment is hugely significant as it fleshes out what the Ten Year Children's Strategy has to do in relation to '... play and recreation, culture and leisure ...'

The general comment defines all elements of article 31, in addition to the statement on play, and explains their importance in the growth and development of children and their impact on children's overall well-being. The twenty-two page General Comment statement also addresses challenges to the implementation of Article 31, which include:

¹³ OFMDFM (2006) Our Children and Young People – Our Pledge A TEN YEAR STRATEGY FOR CHILDREN AND YOUNG PEOPLE IN NORTHERN IRELAND 2006 – 2016. Available at: <http://www.dardni.gov.uk/our-children-and-young-people-ten-year-strategy.pdf>

¹⁴ Byrne, B. and Lundy, L. (2013). Legal Measures for Implementing Children's Rights: Options for Northern Ireland. Available at:

<http://www.qub.ac.uk/researchcentres/CentreforChildrensRights/filestore/Fileupload,425359,en.pdf>

¹⁵ *ibid*

- Lack of awareness in adults of its importance (particularly of child-controlled play).
- Inadequate space for children's play.
- Excessive pressure for educational achievement.
- Increase in structured and programmed leisure time as well as the negative effects of technology.
- The fact that children are rarely involved in planning for play.
- Groups of children requiring particular attention in order to realize their rights under Article 31 (Children with disabilities, girl children, children in institutions, working children and children in deep poverty are examples of these).

States parties' obligations: Most importantly, the General Comment provides a detailed elaboration of the specific actions that governments should take to ensure that all the provisions of Article 31 are fully implemented.

Article 31 imposes an obligation on States parties to guarantee that these rights are realised for every child without discrimination, and, imposes three types of obligation:

- (a) *The obligation to respect* requires States parties to refrain from interfering, directly or indirectly, with the enjoyment of Article 31 rights
- (b) *The obligation to protect* requires States parties to take steps to prevent third parties from interfering with Article 31 rights
- (c) *The obligation to fulfil* requires States parties to introduce the necessary legislative, administrative, judicial, budgetary, promotional and other measures aimed at the full enjoyment of Article 31 rights by undertaking action to make available all necessary services, provision and opportunities

Article 31 is hugely important in its own right but is significant to so many other articles.

... play is both a right in itself as well as an important means of achieving other rights (such as health, development and education). Moreover, it potentially adds to these debates in emphasising that the right to play is in turn dependent on the fulfilment of a number of other rights (such as health, development and education) and should therefore be acknowledged as an important outcome of other child-focused initiatives (Davey and Lundy, 2011:4).

The General Comment calls on State Parties to support the realisation of Article 31 rights. For Northern Ireland State Parties, means the Northern Ireland Executive at Stormont. General Comment 17 sets out how Article 31 links with the general principles of the convention and other relevant articles:

- Article 2 (non-discrimination),
- Article 3 (best interests of the child),
- Article 6 (life, survival and development),
- Article 12 (right to be heard)
- Article 13
- Article 15
- Article 17
- Article 22
- Article 23
- Article 24
- Article 27
- Article 28 and 29
- Article 30
- Article 32
- Article 19, 34, 37 and 38
- Article 39

REALISING ARTICLE 31 WITHIN DELIVERING SOCIAL CHANGE

Article 31 is a cross-cutting right, which is intertwined with many of the other articles and therefore must not be separated out or disregarded. In relation to poverty General Comment 17 states:

Children living in poverty: Lack of access to facilities, inability to afford the costs of participation, dangerous and neglected neighbourhoods, the necessity to work and a sense of powerlessness and marginalization all serve to exclude the poorest children from realizing the rights provided for in article 31. For many, the risks to their health and safety outside the home are compounded by home environments which provide no or little space or scope for play or recreation. Children without parents are particularly vulnerable to loss of their rights under article 31; children in street situations are not afforded play provisions, and are commonly actively excluded from city parks and playgrounds, although they use their own creativity to utilize the informal setting of the streets for play opportunities. Municipal authorities must recognize the importance of parks and playgrounds for the realization of the rights provided for under article 31 by children living in poverty and engage in dialogue with them in respect of policing, planning and development initiatives. States need to take action to ensure both access to and opportunities for cultural and artistic activities for all children, as well as equal opportunities for play and recreation (United Nations 2013, para 41).

A major strand of DSC is focused on reducing child poverty. Given that the forecasts by the Institute of Fiscal Studies are so dire we would urge the Executive to learn from the experiences of other devolved jurisdictions and to take bold steps. For example the Welsh Child Poverty Strategy recognises the right to play and the contribution of play to children's development and resilience, vital elements in children's development and promotes a strong protective factor in children's lives.

The Welsh ground-breaking Play Sufficiency Duty came as part of the Welsh Government's anti-poverty agenda and recognised that children can have a poverty

of experience, opportunity and aspiration, and that this kind of poverty can affect children from all social, cultural and economic backgrounds.

PlayBoard would urge the Executive to look to the experience of the Welsh Assembly Government, which has articulated play to be a crucial element in children's development and something that can provide a strong protective factor in children's lives. The Child Poverty Strategy 2011 set out the Welsh Government's view on the importance of play in children's lives and its contribution to their development, resilience in difficult situations and therefore its role as a mitigating factor for children living in poverty.

[Play] can, to an extent, shield children from the negative aspects of poverty and allow them to develop their inner resources and build resilience to difficulties and uncertainties in their home and other part of their lives. Play contributes towards children's personal and social development, their physical and mental health, and their ability to learn and engage with education¹⁶.

Wales is the first country in the world to legislate for play and intends to continue to work closely with local authorities and all partners on ways to implement the plans for improving play opportunities for all children and young people in Wales¹⁷.

To support this understanding, the Welsh Assembly Government has placed Play Opportunities in Part 1: Child Poverty, Play and Participation, of the Children and Families (Wales) Measure 2010. This places a duty on local authorities to assess and secure sufficient play opportunities for children in their areas as far as reasonably practicable. This allowed Ministers to place a duty on local authorities to assess and secure sufficient play opportunities for children in their areas so far as reasonably practicable. The regulations, standards and guidance to local authorities in complying with this duty were issued during 2011¹⁸.

¹⁶ Welsh Government (2011) Child Poverty Strategy for Wales Available at:
<http://wales.gov.uk/docs/dsjlg/policy/110203newchildpovstrategy2en.pdf>

¹⁷ Welsh Government (2013) Child Poverty Strategy For Wales Progress Report 2013
<http://wales.gov.uk/docs/dsjlg/policy/131129child-poverty-strategy-progress-reportv2-en.pdf>

¹⁸ Welsh Government (2011) Child Poverty Strategy for Wales Available at:
<http://wales.gov.uk/docs/dsjlg/policy/110203newchildpovstrategy2en.pdf>