

Consultation on the Curriculum and Assessment (Wales) Bill

Evidence submitted to the [Children, Young People and Education Committee](#) for Stage 1 scrutiny of the Curriculum and Assessment (Wales) Bill.

About you

Organisation: Play Wales

1. The Bill's general principles

1.1 Do you support the principles of the [Curriculum and Assessment \(Wales\) Bill](#)?

Yes

1.2 Please outline your reasons for your answer to question 1.1

(we would be grateful if you could keep your answer to around 1500 words)

Play Wales welcomes the four purposes of the Bill which outline the principles of the new curriculum. We particularly welcome the fourth purpose, which seeks to ensure that the Welsh education system supports the development of healthy, confident individuals. There is compelling evidence that playing is central to children's physical, mental, social and emotional health and well-being. Through play, children develop resilience and flexibility, contributing to physical and emotional well-being. For children themselves, playing is one of the most important aspects of their lives; they value time, freedom and quality places to play.

We believe that the sentiment of providing a broad and balanced teaching and learning environment, whilst also embracing the health and well-being of the child, can potentially provide a better and more positive learning experience.

Although the general principles of the Bill have allowed room for the inclusion of creative approaches to teaching in the curriculum, Play Wales stresses the need for a more pronounced commitment and appreciation of the value of play and the skills to promote learning that meets the traditional numeracy/literacy criteria through play and through projects the children can lead themselves, linked into what is relevant to them in their own

places and communities. We also stress the need to place greater value and importance on play and break times for all children.

Prior to schools closing as part of the Covid-19 response, Play Wales had seen an increase in contact from parents with concerns about the the withdrawal of playtime as part of behaviour management policy and also of the shortening of school days, a process being achieved by a reduction in break times in secondary schools and playtimes, as referred to in primary schools.

The practice of withdrawing break time as a punishment for bad behaviour, slow progress or forgetting equipment is still common across many schools. When playtime/breaktime is withdrawn or parts of it withheld, children are publicly humiliated, and for many that experience creates a negative situation. Excluding children from playtime can make them vulnerable to name calling, isolation or bullying. Ensuring that playtime exclusion does not feature in behaviour regulation strategies will encourage collaboration and co-operation, which helps children be happy and healthy.

Additionally, concerns about diminished opportunities for play, especially for vulnerable groups such as children with special educational needs and disabilities, and children living in poverty had already been highlighted by the British Psychological Society Division of Child and Educational Psychologists in a Position Paper [1]. Additionally, it has been found that curriculum pressures have led to reduced opportunities for play in schools [2].

The Active Healthy Kids Wales 2018 expert group recommended that providing sufficient breaks for play and would contribute to overall physical activity for children. In a 2019 report [3], the Health, Social Care and Sport Committee expressed disappointment to hear that reductions in lunch breaks and break times (which provide daily opportunities to get active) are common in schools. It urged the Welsh Government to review how widespread this practice is in schools across Wales. Play Wales is not aware of such a review taking place.

A focus on play and its significant contribution to health and well-being is particularly critical during the Covid-19 pandemic. Play First: Supporting Children's Social and Emotional Wellbeing During and After Lockdown [4], a letter sent to Welsh Ministers, urges governments to prioritise children's play and socialising with friends over formal lessons and academic progress when schools reopen, and lockdown restrictions are eased. Children's rights advocates have called for the focus to be on play and mental health, rather than curriculum catch up [5].

[1] Hobbs, C., et al. (2019) Children's Right to play position paper. Leicester: The British Psychological Society Division of Educational and Child Psychology.

[2] Baines, E. and Blatchford, P. (2019) School break and lunchtimes and young people's social life: A follow-up national study. Final report (EDU/42402) to the Nuffield Foundation.

[3] National Assembly for Wales Health, Social Care and Sport Committee (2019) Physical Activity of Children and Young People. Cardiff: National Assembly for Wales Commission Copyright 2019.

[4] Cartwright-Hatton, et al. (2020) Play First: Supporting Children's Social and Emotional Wellbeing During and After Lockdown. Brighton: University of Sussex.

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

[5] Atkinson, C. and Mannello, M. (2020) Prioritising play to promote wellbeing. [Blog] Policy@Manchester Blogs. Available at:
<http://blog.policy.manchester.ac.uk/posts/2020/05/prioritising-play-to-promote-wellbeing/>

1.3 Do you think there is a need for legislation to deliver what this Bill is trying to achieve?

(we would be grateful if you could keep your answer to around 500 words)

Yes, Play Wales agrees that legislation is needed to ensure a clear direction and a consistent approach.

2. The Bill's implementation

2.1 Do you have any comments about any potential barriers to implementing the Bill? If no, go to question 3.1

(we would be grateful if you could keep your answer to around 500 words)

We draw on the United Nations Convention on the Rights of the Child (UNCRC) to answer this question. The importance of play is recognised and protected in Article 31 of the

UNCRC. As an indication of the significance the United Nations places on children's play it has published General comment no. 17 [6] on Article 31.

In this document, the UN Committee on the Rights of the Child also emphasises that the rights under Article 31 are of positive benefit to children's educational development and should be facilitated during the course of every day throughout early childhood education, as well as in primary and secondary school. In General comment no. 17, the Committee identifies pressures facing schools as potentially denying children of their right to play, highlighting:

- o Extracurricular tuition and homework are intruding on children's time for freely chosen activities
- o The curriculum and daily schedule often lack recognition of the necessity of or provision for play, recreation and rest
- o Restrictions on the type of play in which children can engage in school serve to inhibit their opportunities for creativity, exploration and social development.

These pressures identified by the UN Committee are barriers to implementing the purposes of the curriculum as outlined in the Bill.

[6] United Nations Committee on the Rights of the Child CRC (2013) General comment No. 17 on the right of the child to rest, leisure, play, recreational activities, cultural life and the arts (art. 31). Geneva: Committee on the Rights of the Child.

2.2 Do you think the Bill takes account of these potential barriers?

(we would be grateful if you could keep your answer to around 500 words)

No. The barriers discussed above would be effectively addressed if the Bill demonstrated a clear, legislative commitment to the universal protection and provision of playful and creative approaches to teaching and to sufficient play and break times. The new curriculum for Wales must explicitly place greater emphasis on the need to provide sufficient time for play.

We are therefore urging the committee to take the legislation further and amend the Bill to ensure universal provision and recognition of play by:

- Including a statutory requirement for play and breaktimes. This would be strengthened by the provision of guidance about what that means in terms of facilities, space and support [7]. Estyn should be instructed to make the provision of sufficient breaks for play mandatory as part of its statutory inspections.
- Ensuring there is a greater focus on Educational pedagogy – General comment 17 describes the importance of learning environments being active and participatory. Schools can make playful activities central to learning, for older children as well as for those in the early years. Recent research [8] from The University of Manchester found that where the boundaries between schoolwork and play were more 'blurred', children felt a greater sense of control over their own learning experience.

Play Wales understands that the planning of the school day is covered in the Education (School Day and School Year) (Wales) Regulations 2003 (SI 2003/3231) and that it might be perceived that our recommendations are outside the Bill's scope. However, there is a need to take a holistic approach given the educative value of the play and the health and well-being benefits that playing brings which synergises with Welsh Government's ground-breaking approach on the importance of play.

[7] See – Play Wales (2020) A play friendly school – Guidance for a whole school approach. Cardiff: Play Wales <https://www.playwales.org.uk/eng/publications/schoolsguidance>

[8] Goodhall, N. and Atkinson, C. (2017) How do children distinguish between 'play' and 'work'? Conclusions from the literature. Early Child Development and Care.

3. Unintended consequences

3.1 Do you think there are there any unintended consequences arising from the Bill? If no, go to question 4.1

(we would be grateful if you could keep your answer to around 500 words)

Yes. The current wording of the Bill is very much focused on deferred outcomes (i.e. '...ready to lead fulfilling lives as valued members of society.') Whilst deferred health and well-being benefits are important, of equal importance are the immediate benefits for

children of all ages. General comment 17 notes the range of multiple important physical, social, cognitive and emotional skills that playing brings, but it also stresses the immediate importance it holds for children – referring to play as ‘a fundamental and vital dimension of the pleasure of childhood’.

As it currently stands, it can be perceived that there is emphasis on performance in the Bill. In recent years there has been a disproportionate focus in education policy on measuring success via 'standards' equating to Programme for International Student Assessment (PISA) scores, despite a narrative about well-being being important in schools.

Learners learn best when they are active participants in their own learning – discussing, interpreting and discovering. This approach emphasises deep learning and understanding over the memorisation of facts and rote learning. The new curriculum provides a good opportunity for creativity-led learning and this needs to be more strongly emphasised in the legislation.

We emphasise the need to ensure the importance of playing is significantly represented across all Areas of Learning in the curriculum.

4. Financial implications

4.1 Do you have any comments on the financial implications of the Bill (as set out in Part 2 of the [Explanatory Memorandum](#))? If no, go to question 5.1

(we would be grateful if you could keep your answer to around 500 words)

No.

5. Powers to make subordinate legislation

5.1 Do you have any comments on the appropriateness of the powers in the Bill for Welsh Ministers to make subordinate legislation (as set out in Chapter 5 of Part 1 of the [Explanatory Memorandum](#)). If no, go to question 6.1.

(we would be grateful if you could keep your answer to around 500 words)

No.

6. Other considerations

6.1 Do you have any other points you wish to raise about this Bill?

(we would be grateful if you could keep your answer to around 1000 words)

Section 11 of the Children and Families (Wales) Measure places a duty on local authorities to assess and secure sufficient play opportunities for children in their area.

To comply with these duties each local authority in Wales submits a Play Sufficiency Assessment to Welsh Government Ministers every three years, as well as annual Play Action Plans.

Wales – a Play Friendly Country, statutory guidance to local authorities, sets out a wide range of Matters across several policy areas that need to be considered. The statutory guidance notes that schools provide an important opportunity for children to play during the school day and for periods before and after classes. Schools can also provide valuable play space at weekends and during holidays. The Welsh Government recommends that local authorities advise schools to provide high quality play space and sufficient time for children to play during the school day.

The Play Sufficiency Assessment should assess the extent to which:

- children are provided with an interesting play environment for breaks during the school day
- children are provided morning, lunchtime and afternoon play breaks.

Recent research [9] into the implementation of the Play Sufficiency Duty found that there was a sense that the Play Sufficiency Duty has a lower status than other pieces of government legislation or national initiatives. The same research highlights a key theme of play's contribution to well-being noting that 'the evidence is compelling for the contribution that self-organised play can make to children's well-being, particularly in terms of mental health and resilience (through attachments to peers and to place, emotion regulation, stress response systems, pleasure, openness to learning) and to their physical health. In this sense, play is children's own way of taking care of themselves and of ensuring their own health and well-being, embracing an assets-based rather than deficit view of children's own capabilities'.

If Welsh Government is committed to health and well-being being a purpose of the Welsh Curriculum and at the forefront of Welsh Government policy for schools, then the links between education policy and play sufficiency need to be considerably strengthened.

All adult employees have breaks built into their daily work pattern to promote socialisation, alertness, rest and physical activity. Pupils require breaks for the same reason and the benefits of play are well recognised. However, the practice of withdrawing playtime as a punishment for bad behaviour, slow progress or forgetting equipment (such as PE kit) is still common across many schools. Play Wales is concerned about this practice, but they are not our concerns alone. They are shared by the the Active Healthy Kids Wales 2018 expert group, the British Psychological Society's Division of Child and Educational Psychologists, the Senedd Wales Health, Social Care and Sport Committee, and children and their parents.

The demands on schools to achieve academic targets must not be put above the duty to protect the health and well-being of the children in their care. Time and space allocated to play is associated with pupil well-being and should therefore be considered as a vital element of school life and the Curriculum and Assessment (Wales) Bill should better reflect this.

[9] Russell, W. et. al. (2020) Making it possible to do Play Sufficiency: Exploring the conditions that support local authorities to secure sufficient opportunities for children in Wales. Cardiff: Play Wales

<https://www.playwales.org.uk/eng/news/1421-research-making-it-possible-to-do-play-sufficiency->

