



## **Updating of the School Premises (General Requirements and Standards) (Scotland) Regulations 1967**

**October 2017**

### **About YouthLink Scotland**

YouthLink Scotland is the national agency for youth work. We are a membership organisation, representing over 100 regional and national youth organisations from both the voluntary and statutory sectors. Our vision is of a nation which values its young people and their contribution to society, where young people are supported to achieve their potential.

Scotland's youth work sector is as rich and diverse as the nation itself. Our sector has a workforce in excess of 80,000 – including over 70,000 adult volunteers. We reach in excess of 380,000 young people in youth work opportunities each week.

This includes opportunities in youth clubs, youth projects, specialist or targeted provision, social activism, outdoor learning, awards programmes, uniformed organisations, democratic participation, and in youth work and school partnerships.

As the national agency for youth work, and in our role as an intermediary we have endeavoured to respond to this consultation in the best interests of the youth work sector, however the views contained within this response may not be held by each of our individual members.

### **Introduction**

Youth work “can help to empower and improve learning and resilience for our most disadvantaged communities.”<sup>1</sup> Youth work is recognised in Scotland as playing a crucial role in young people's learning alongside the formal education system. Increasingly youth work and schools are working in partnership; with youth workers providing alternative routes to learning for some of Scotland's most vulnerable young people. This time for learning often takes place within the school estate.

The National Youth Work Strategy 2014-19 has the ambition that all young people have access to quality youth work. For this to be achieved it is important that there are high quality spaces and places for youth work to take place. It is for this reason that YouthLink Scotland are responding to the Scottish Government consultation: *Updating of the School Premises (General Requirements and Standards) (Scotland) Regulations 1967*.

---

<sup>1</sup> Scottish Government (2016) *National Improvement Framework*  
<http://www.gov.scot/Topics/Education/Schools/NationalImprovementFramework>

## Spaces for Learning and Community Benefit (Educational Accommodation)

We believe that schools should be assets for the whole community all of the time. We would welcome provisions within the forthcoming regulations that recognises schools are places for learning of all ages: and that spaces must be planned within the school estate for community and lifelong learning purposes. We would welcome specific provisions for non-formal spaces for community learning (in addition to classrooms) to be included within the regulations. We recognise that schools increasingly include community facilities (swimming pools, libraries, gyms etc.) however there should also be space within the school estate which is for informal learning to take place and which can be accessed at different times of the day and night all year round.

## Outdoor Space (Playing Fields)

We believe in the value of play for young people of all ages<sup>2</sup> and are concerned that the proposals in the consultation may reduce informal play spaces available to children and young people. Play time for young people is important for socialising, taking risks, and engaging with the outdoor environment.

We are concerned that the proposal for space for play would also include synthetic pitches which have restricted access – and are created purposefully for sport and often require a fee to be paid/booked for use, are locked, or require specific footwear for their use.

General Comment 17 of the United Nations Convention on the Rights of the Child says:

““In respect of play and recreation, the age of the child must be taken into account in determining: that sufficient free time is afforded; **the nature of spaces and environments available to children**; forms of stimulation and diversity; and the necessary degree of adult oversight and engagement to ensure that children are properly protected from hazards, while exercising their rights to play and recreation. **As children grow older, they move from wanting settings that afford play opportunities, to places offering opportunities to socialise, to be with their peers, or to be alone.** They will also explore progressively more opportunities for risk-taking and challenge. These experiences are developmentally necessary for adolescents, contributing to their discovery of identity and belonging.<sup>3</sup>”  
(YouthLink Scotland added emphasis)

The comment also advises that when young people play it is often regarded as anti-social behaviour and that young people’s use of public space is often demonised. It

<sup>2</sup> YouthLink Scotland and Play Scotland (2016) *Playing Together Report*

<https://www.youthlinkscotland.org/media/1841/playing-together-final-interactive-version.pdf>

<sup>3</sup> United Nations (2013), *General Comment No.17 on the right of the child to rest, leisure, play, recreational activities, cultural life and the arts (art.31)*, United Nations Human Rights Office of the High Commissioner

is therefore crucial that schools (young people's domain) are spaces that encourage play, recreation and positive interactions in both community learning spaces and the playground.

### **Children's Rights and Wellbeing**

We welcome that that a CRWIA will be conducted as part of this process. In particular we feel that some of the proposals may impact negatively on Article 31 of the United Nations Convention on the Rights of the Child. We have set out these concerns above, but would reinforce our view that play and non-formal learning spaces are for children of all ages up to age 18 and their needs will be different from those in nursery or primary stages.

*For further information please contact Susan Hunter, Senior Development Officer (Policy and Research) [shunter@youthlinkscotland.org](mailto:shunter@youthlinkscotland.org) or 0131 313 6815.*