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PROCEEDINGS OF THE WORKSHOP ON PLAYGROUND SAFETY REGULATION AND STANDARDIZATION

This workshop has been organized by the European Consumer Product Safety Association in co-operation with the Commission of the European Community (DG III) and the Comité Européen de Normalisation, with support from the Motherlands' Ministry of Welfare, Health and Cultural Affairs.

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LECTURES ON THE SAFETY OF PLAYGROUNDS

The heart of the workshop on playground safety consisted of five lectures given by different experts on different aspects of the safety of playgrounds. All participants had received a working document on beforehand which contained a proposal for an overall approach to playground safety (see Annex 2), This proposal has been tailored for the EEC structure with respect to legislation and standardization, and their interaction in particular (see also chapter 3), The working document also contains an extensive chapter with new information on playground related injuries, but this chapter was not discussed at the workshop.

The five experts had been asked to forward their opinions on the following subjects:

- **Mr. Mogens Tom Jensen, Kompan* Ringe. DK.**

Principles of playground safety;

- Mr. J. Richter, Richter Spielgerate, Frasdorf (FRG):

Essential safety requirements for playground equipment;

- Mr. G. Tipp, Centre for Sports Technology, London (UK);

Essential safety requirements for surface materials;

- Mr. E. Baas, Speethout, Zaltbommel (ML):

Essential safety requirements for siting, lay-out and installation;

- Mr. P.J. Heseltine, Rational Playing Fields Association* London (UK):

Essential safety requirements for operation and maintenance.

The lecturers had also been invited to comment on the possibility of European legislation for the safety of playgrounds, i.e. the establishing of a European Directive, and the proposal in the working document containing the essential safety requirements to be incorporated *in* such a directive.

In the following section the lectures given by the experts will be summarised.

The conclusions following from the contributions of the experts and the subsequent discussions at the workshop will be summarized in chapter 5*

Principles of playground safety by Soc. Pæd. Mogens Tom Jensen

I have been asked to comment explicitly on the idea of proposing a European Directive on Playground Safety, and to discuss the advantages and disadvantages* Before I continue with my comments to section 3 of the working document* I would like to express *my* compliments to the people who prepared this document* In my opinion they have done a great job, which makes my job so much easier. Yet, I will give a few supportive contents to keep the discussion going.

I believe that there is nothing in this world stronger than the right idea at the right time. Therefore, I think that a European Directive in this field based on the new approach concept is the only solution to the problems we are facing* The problems that we have to solve are generally identified and acknowledged by the public and the manufacturing industry, and the necessary experience to find solutions is available* Personally -and from international experiences- I believe that a directive linked to a comprehensive set of standards is one of the only ways to avoid a situation similar to the American one. With all the pros and cons that can be put on the table, I have seen too many playgrounds being closed over there, because of the liability crisis; this should not happen in Europe.

Safety and play value

I do not have to remind people at this workshop about children's right to play, but I do like to draw your attention to the next passage in your working document that starts with a quote from J. Richter!

"We need as much play value as we can possibly have, whereas we only need as much safety as necessary (Richter, 1985)

Safety requirements should only deal with hazards not with design solutions, and each requirement should be an answer to a real safety problem", I suggest these quotations to be found at one of the first pages of the directive. As said in the working document "These remarks seem to be so self-evident that they had better be omitted, yet they have to be mentioned explicitly".

Another quotation in the working document is from Root (1983), who states that "a balance between the apparently conflicting goals safety and play value can be achieved by providing enough risk to challenge different ages, while concentrating on injury prevention rather than accident prevention".

Root says further that children should be allowed to risk failure, but they should be protected from failure which would cause serious injury or 'death'

Considering the basic criteria to be incorporated in a safety philosophy for playgrounds^ I think that, next to a criterion about types of injuries to be avoided, also something should be said about calculable risks. In my opinion it is possible to rely on children's own experience from the age of seven. The seven year old child is extremely capable of risk evaluation according to its own perception and skills.

This is supported by the universal drop in the accident figures, and I feel that an adoption of this criterion could help provide better play facilities for the older children, They are the ones with the mobility to go for other and more dangerous places, if the playground does not provide the right opportunities for challenge.

Because of that, I am not sure that applying specific criteria for different age groups is a sensible way, or at all possible for that matter* It would be like putting the eyeglass before the blind eye, because it has nothing to do with reality* Very few are the situations where only a well defined age group uses a playground or a piece of equipment. Schools and daycare centers are in the process of being open for public use, and even where attempts have been made to install age related equipment, this concept is going to fail. Smaller children will be put on older children's equipment by their parents or by older children, and in other cases small children will be exposed to risks when trying to overcome the preventive measures that have been designed into older children's equipment to prevent smaller children from use* I agree with Root that this leads to another principle for safety, so that we emphasize our intentions as trying to avoid the serious consequences of an accident, and not the accident itself*

As stated by Rogmans (1579); "Primarily the result or the consequence of an accident forms an essential part of the definition itself, so the severity of the consequences of an event should always exceed a certain threshold value in order to permit the event to be defined as an accident". In this connection a recent trend was indicated just last week by one of the Danish accident analysis groups, doing a follow-up study on their 1981 report. They found that children in an increasing number were brought to hospital in case of injuries that previously were taken care of in the home or in the daycare, school etc. This indicates that future statistics must be based on more specific criteria to be able to measure the actual safety level of playgrounds. In this connection I quote the following passage from section 2,5 of the working document."For the development of an effective and efficient prevention strategy for playground related injuries, a detailed analysis of injury data is not enough* Also, a hazard analysis should be performed in order to identify the injuries that are already being prevented by the existing safety criteria and common knowledge among designers and manufacturers",

I support this if it means that somebody is going to register/survey the difference in the accident and injury pattern on playgrounds that comply with standards as opposed to non-complying playgrounds* If this is not the case, I can only propose that a study of this nature and purpose be conducted as soon as possible.

It is crucial that the process we are Involved In be pointed in the right direction from the beginning,

Basic principles of playground safety

I am not qualified to have a firm opinion about the position of a directive in a legislative context, but from the top of my head I detect the advantage of Joining with the directive on the safety of toys. Maybe in 20 years time that could lead to a series of directives concerning all aspects of children's lives, forming a complete manual for the total quality of life that we want to offer to our children. Why not?

As regards the actual wording of the first part of the proposal for basic principles of playground safety, I have another proposal. It goes like this:

1. Safety balanced to play value should be an integrated part of the life cycle of any playground, from planning the site until the final dismantling* All hazards and risks during each phase of the life cycle must be identified, documented and recorded in order to be able to eliminate or minimize injuries.

For the second principle I propose the following;

2. Hazards that are inherent to play value, and cannot be eliminated or minimized by modifying the design of the playground and/or the play equipment without altering its recognized play value, are acceptable, provided,

- that the risk is apparent and can be perceived by children, and/or
- that it is difficult for the child to enter the risk involving situation on its own, and/or
- that there is a "way out" available for those who regret because, they cannot cope with the situation adequately.
- that the health hazards and the physical injuries have no permanent consequences.

As for the third part of the proposal, regarding an acceptable Injury level per million visitors, I am not qualified to evaluate this, but I have doubts as to whether these figures can be adopted and related to playground visitors solely as a realistic goal. 15 fractures per million visitors on a playground seem to me, a matter of children's arms and legs better be made of steel in the future* I may be wrong and should perhaps be corrected on this.

European Directive on playgrounds

Generally it should be emphasized that what we are dealing with here should not only be relevant to the future but also addresses the sins of the past.

The question arises whether the directive is going to address the issue of updating and/or removal of old play equipment,

Another Important aspect of accident prevention schemes concerns the quality of the data and information provided. How do we "make sure that future registrations incorporate the specific data that we desperately need in order to do a better job? Each requirement should be an answer to a real safety problem, remember! Is the Directive going to address the fact that a majority of the product related injuries presumably comes from non-professionally made equipment? To put it shortly: does it make sense at all that manufacturer X is forced to use resources on a new swing design, when it becomes obvious from data that the problems are produced by the unemployment project Y or municipality Z?

Finally, something is on my mind that has not been brought up yet: the question of children with special needs. The problem I foresee, without going into details at this stage, is that we are facing the responsibility to provide non-discriminating play environments. This also concerns play equipment to some extent, how do we tackle possible contradictions between safety requirements and the necessary handicap considerations?

Is there an open clause for future experiments in the Directive?