

Victory Gaming Safeguarding Policy – Updated April 2026

Policy statement

Victory Gaming is committed to providing a safe, caring and stimulating environment where all young people can thrive. Through our **Level Up** alternative provision programme and wider esports activities we engage students who may be at risk of disengagement by harnessing the positive power of video gaming. Many of our learners have additional vulnerabilities or complex needs; this policy sets out how we protect the welfare of every student in our care and meet our legal and moral obligations to safeguard children and young people.

Legal framework and principles

This safeguarding policy is informed by the following key legislation and statutory guidance:

- **Keeping Children Safe in Education (KCSIE) 2024** – updated guidance on the duties of schools and alternative provisions with an emphasis on early help, mental health and the needs of lesbian, gay, bisexual and gender-questioning children ¹.
- **Working Together to Safeguard Children 2023** – statutory guidance on inter-agency working to safeguard and promote the welfare of children.
- **Children Acts 1989 & 2004** – establishing the paramount importance of the child's welfare.
- **Education (Independent School Standards) Regulations 2014** – expectations for welfare, health and safety of pupils.
- **Prevent Duty** under the Counter-Terrorism and Security Act 2015 – duties to prevent people from being drawn into terrorism.
- **Equality Act 2010** – duties to eliminate discrimination and promote equality.
- **Online Safety Act 2023** and subsequent Ofcom codes of practice – new laws requiring platforms and online services to reduce risks of illegal and harmful content, implement systems to remove content quickly and offer stronger protections for children ².

The policy also aligns with guidance from Ofcom on implementing online safety duties and the UK Government's roadmap for bringing the Online Safety Act into effect, including the requirement for in-scope services to complete risk assessments by mid-2025 ³.

Scope

This policy applies to all staff, governors, contractors, volunteers, visiting professionals, partner schools, parents/carers and students involved with Victory Gaming's alternative provision and esports activities. It covers on-site sessions at Victory Gaming venues, off-site trips and any activities conducted online or through esports platforms.

Quick guide: responding to disclosures or safeguarding concerns

If a child or young person discloses abuse or you have a safeguarding concern, follow these steps:

1. **Listen calmly and allow them to speak.** Use open prompts such as “Tell me what happened”; do not ask leading questions or attempt to investigate yourself.
2. **Reassure them.** Thank them for telling you, say that they have done the right thing and explain that you will need to share their disclosure with the safeguarding team to keep them safe.
3. **Record the disclosure.** Write down exactly what was said, along with your observations and the date/time of the disclosure. Complete the incident record form (see Appendix) as soon as possible.
4. **Report without delay.** Contact one of the following safeguarding leads:
5. **Designated Safeguarding Lead (DSL): George Herrera – mobile 07899293671**
6. **Deputy DSL: Reuben White – mobile 7340411126**
7. **If neither is available and there is immediate danger, call 999** or contact children’s social care directly.
8. **Do not promise confidentiality.** Be honest: you will only share their information with those who need to know to ensure their safety.

When a child asks why you must share what they said, an appropriate response is: **“Your safety is very important. I need to let our safeguarding team know so they can make sure you get the right help and stay safe.”**

Roles and responsibilities

- **Designated Safeguarding Lead (DSL) – George Herrera (mobile 07899293671).** George is a senior member of the team with authority to oversee safeguarding and child-protection matters. The DSL acts as the lead point of contact with statutory agencies and ensures that concerns are responded to appropriately.
- **Deputy DSL – Reuben White (mobile 7340411126).** Reuben supports the DSL and acts in their absence.
- **All staff and volunteers** – share collective responsibility to protect students, understand this policy and attend safeguarding training. They must follow safer working practices and report any concerns immediately.
- **Management/Trustees** – ensure effective safeguarding policies and procedures, allocate sufficient resources, monitor implementation and carry out safer-recruitment checks.
- **Parents, carers and partner schools** – work collaboratively with us to support each young person, provide relevant information and engage with regular reviews of placements.

Recognising and responding to safeguarding concerns

Concerns about a child’s safety or welfare must be reported immediately to the DSL or deputy. Staff will:

1. **Record factual details** of the concern (what was seen, heard or disclosed) without delay.
2. **Reassure the student** and explain next steps; do not promise confidentiality.
3. **Pass the information** to the DSL, who will assess risk and liaise with parents/carers and external agencies as appropriate.

4. **Refer directly** to children's social care or the police if there is an immediate risk of harm.

Victory Gaming operates a **whistleblowing** procedure: staff should report concerns about colleagues or organisational practice to the DSL, management or trustee board without fear of reprisal.

Safer recruitment, induction and training

We adopt robust recruitment procedures including enhanced Disclosure and Barring Service (DBS) checks, identity and qualification checks, references and verification of suitability to work with children. All staff receive safeguarding and child-protection training relevant to their role, with regular updates. Volunteers and esports coaches are supervised and given clear guidance on professional boundaries.

Risk management and safe environment

Individual risk assessments are conducted for each student, taking account of any vulnerabilities, special educational needs, disabilities or mental-health issues. Our premises are secure with controlled entry and supervision at all times. Safeguarding arrangements extend to off-site activities and lone-working; clear procedures are in place for supervision and communication. Students using our esports equipment and online platforms are supervised by staff and provided with online-safety guidance. We ensure equipment and digital platforms meet age-appropriate standards and incorporate parental controls where possible.

Information sharing and record keeping

We work closely with commissioners, partner schools, parents/carers and safeguarding partners. Relevant information is shared securely and lawfully in line with the Data Protection Act 2018 and UK GDPR. Records of concerns, referrals and actions are kept confidentially and stored securely. We support multi-agency collaboration to ensure continuity of care and reduce risks.

Prevent Duty, equality, diversity and inclusion

Victory Gaming promotes equality, diversity and respect and is committed to creating an inclusive environment. We comply with the Prevent Duty by addressing risks of radicalisation and extremism; staff are trained to recognise signs of extremism and refer concerns accordingly. Our behaviour policy addresses bullying, sexual harassment and discrimination. The curriculum encourages digital literacy, well-being and resilience.

In line with KCSIE 2024, we pay particular attention to children requiring mental-health support, those with special educational needs or disabilities and lesbian, gay, bisexual or gender-questioning children. Staff are encouraged to seek **early help** so that concerns do not become crises ¹.

Monitoring and review

This policy will be reviewed at least annually or when significant changes in legislation or guidance occur. We welcome feedback from students, parents/carers, partner schools and safeguarding partners. Dates of reviews and any updates are recorded and approved by management.

Safeguarding in video games and online gaming

Purpose and scope

Video games offer entertainment, creativity and social connection but also present risks. This section applies to any Victory Gaming programme, partner organisation or contractor that uses or promotes video games (including esports and online multiplayer games) and aims to protect children and young people from harm. It draws on guidance from online-safety experts and the UK's Online Safety Act. Providers of online gaming services should undertake risk assessments and implement measures proportionate to the size and risk of their services ⁴.

Legal and regulatory framework

- **Online Safety Act (OSA) 2023** – sets out duties for platforms to reduce risks of illegal content, remove illegal content promptly and protect users from harmful content. Ofcom's guidance explains that providers must implement systems and processes to address illegal content, with the strongest protections for children ⁵. Some duties took effect from January 2024 and the child-safety regime will be fully in force by July 2025 ³.
- **Protection of Children Codes and Age-Assurance Guidance (2025)** – require in-scope platforms to carry out risk assessments and implement age-assurance measures.
- **PEGI (Pan European Game Information) ratings** and UK age-ratings – ensure games are appropriate for the player's age.
- **ICO Children's Code** (Age-Appropriate Design Code) and UK GDPR – set standards for protecting children's personal data online.

Key risks

- **Inappropriate content:** violent or explicit themes may be present; always check age ratings to ensure games are suitable.
- **Contact with strangers and grooming:** multiplayer games often include chat functions that can expose children to strangers.
- **In-game purchases:** micro-transactions encourage spending real money; children may not understand the value and could make unexpected purchases.
- **Cyberbullying and harassment:** online gaming can foster negative behaviour; research shows many teens are concerned about trolling and abusive behaviour.
- **Addiction and excessive screen time:** games are designed to be engaging; excessive play can disrupt sleep, reduce physical activity and affect schoolwork.
- **Data privacy and personal information:** sharing personal details can expose children to identity theft or predatory behaviour.

Safeguarding practices

- **Age-appropriate content:** select games that match the player's age and maturity; follow PEGI ratings and avoid games designed for older audiences.
- **Parental controls and privacy settings:** enable parental controls on consoles, computers and mobile devices to limit content, manage in-game purchases and set screen-time limits. Many platforms allow chat restrictions and the ability to turn off voice or text communications.
- **Open communication:** talk regularly with children about the games they play and who they play with. Encourage them to tell you if something online makes them uncomfortable.
- **Manage in-game spending:** configure purchase settings so children need adult approval before making any in-game purchases; teach them about the value of money.

- **Teach blocking and reporting:** show children how to block other players and report inappropriate behaviour. Reinforce that they should leave chats or games if conversations become abusive or uncomfortable.
- **Set screen-time boundaries:** establish clear limits for gaming and encourage a balance with other activities. Monitor for signs of excessive screen time or behavioural changes such as withdrawal or secrecy.
- **Recognise signs of trouble:** watch for sudden mood changes, secrecy about gaming, increased time spent playing or unexpected purchases, which may signal bullying, grooming or addiction.
- **Safe online communities:** encourage gaming within moderated communities and ensure children know not to share personal information with strangers. For organisations running gaming sessions, designate a Safeguarding Lead to oversee online interactions and ensure staff are trained to recognise grooming, bullying and extremist content.
- **Regular reviews and updates:** review this policy and safety settings at least annually or when new risks emerge; update parental controls following platform updates or new guidance.

Roles and responsibilities for online safety

- **Parents and carers:** actively engage with their children's gaming, use parental controls, discuss safe behaviour and set boundaries.
- **Game providers and platforms:** conduct risk assessments, implement age-verification and moderation tools, offer easy reporting mechanisms and comply with legal duties under the Online Safety Act.
- **Schools, youth organisations and alternative providers:** appoint a Designated Safeguarding Lead to oversee online activity, ensure staff receive training on digital safeguarding and conduct risk assessments for games and services used.
- **Children and young people:** follow the policy, respect age limits, use block/report features and seek help if they encounter inappropriate behaviour.

Reporting and support

Anyone with concerns about online gaming safety should report issues to the platform provider and, where appropriate, to the police or children's social care. Victory Gaming will direct parents and carers to trusted resources such as **NSPCC Net Aware**, **Ofcom guidance** and child-protection hotlines for additional support. Organisations should provide clear contact points for reporting concerns and ensure staff know how to respond promptly and sensitively.

¹ CSCP 5 Minute Briefing - Summary of changes in Keeping Children Safe in Education 2024
<https://content.govdelivery.com/accounts/UKCUMBERLAND/bulletins/3b21120>

² ³ ⁴ ⁵ Online Safety Act: explainer - GOV.UK
<https://www.gov.uk/government/publications/online-safety-act-explainer/online-safety-act-explainer>