



SAFEGUARDING CHILDREN, YOUNG PEOPLE AND ADULTS AT RISK POLICY

VERSION CONTROL TABLE

Version number	Amendments made	Date
V1	Policy created	20 th August 2021
V2	Whistleblowing policy added	19 th October 2021
V3	Review by Kit Brunswick and TootToot Section added	28 September 2022
V4	Annual review and update by Alex Hepton	11 th November 2022

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Introduction

Safeguarding and promoting the welfare of the children, young people and adults who we help to thrive at Guild through our online platforms, College, Academy and Pro teams is our primary concern. The world of esports is an exciting and fast paced environment with great opportunity and some challenges. With those challenges come safeguarding and welfare risks that require sensitive management. This policy sets out our commitment to meeting that challenge.

The policy applies to all of our employees, workers, volunteers and contractors (staff) whether or not they work directly with children, young people or supporting adults at risk. The policy exists to support these staff along with our participants, their parents and carers.

What is safeguarding?

Safeguarding is the proactive and responsive action we take to protect and promote a person's health, wellbeing and rights enabling them to live free from harm, [abuse](#) and neglect. We have a duty to safeguard [children](#) (those who are not yet 18), adults (who are aged 18 or over) and [adults at risk](#).

Many children grow up free of abuse and neglect, and with the right approach, by listening to the views, needs and wishes of children and young people, and by providing the right level of care, children and young people can thrive at home, school and in sport. Sadly, around 1 in 5 children are subjected to abuse.

There are four main categories of [abuse](#), they are:

- [Physical Abuse](#)
- [Emotional Abuse \(includes bullying, radicalisation and living with domestic abuse\)](#)
- [Neglect](#)
- [Sexual Abuse](#)

Local authorities have duties placed upon them to protect children from harm. There are two main areas of responsibilities for local authorities and their partner agencies, of whom Guild are one, when it comes to the protecting children under the Children Act 1989. They are:

- *'Child in Need'* (Section 17 of the act)
A local authority has a duty to provide services to children in need in their areas, this can include disabled children, and those at risk of long-term harm through neglect for example.
- *Child at Risk of Significant Harm* (Section 47 of the act)
This sets out the criteria for protecting children who are at risk of, or are, being abused, exploited or neglected.

Abuse forms part of a context of traumatic events that can happen to children. These are known as 'Adverse Childhood Experiences' or ACEs. As the name suggests, ACEs are events that happen during childhood that can have an enduring impact. They include:

- Physical abuse
- Sexual abuse
- Psychological or Emotional abuse
- Physical neglect
- Psychological neglect
- Being a young carer
- Witnessing domestic abuse
- A close family misusing drugs or alcohol
- A close family member in prison
- A close family with mental ill health
- Parental separation, divorce or death

(*Asmussen et al, 2020*)

Around 67% of adults have at least one ACE from their childhood (Bellis et al, 2014). Research has consistently found that the presence of ACEs in childhood can have a significant impact on outcomes in later life. For example, the higher the number of ACEs, the higher prevalence of mental ill health, addition and abuse victimisation into adulthood (70-30 Campaign, 2021).

For adults, the Care Act 2014 provides the legislative framework for safeguarding [adults 'at risk'](#). As with children, somebody may abuse or neglect an adult by inflicting harm, or by failing to act to prevent harm, in a family or in an institutional or community setting by those known to them or by others. Abuse can take place wholly online, or technology may be used to facilitate offline abuse. Those with existing needs, such as disabled adults, may be at increased risk of harm.

[The Ann Craft Trust](#) define the statutory categories of abuse as:

- [Self-Neglect](#)
- [Modern Slavery](#)
- [Domestic Abuse](#)
- [Discriminatory Abuse](#)
- [Organisational Abuse](#)
- [Physical Abuse](#)
- [Sexual Abuse](#)
- [Financial or Material Abuse](#)
- [Neglect of Acts of Omission](#)
- [Emotional or psychological Abuse](#)

The Ann Craft Trust draws attention to four additional types of harm, which are:

- [Cyber Bullying](#)
- [Forced Marriage](#)
- [Mate Crime](#)
- [Radicalisation](#)

Our roles and responsibilities

Working Together to Safeguard Children (2018) sets out the arrangements which organisations should have in place to be compliant with section 11 of the Children 2004. They are set out in the table below along with how Guild propose to meet those requirements:

<p>A clear line of accountability for the commissioning and/or provision of services designed to safeguard and promote the welfare of children.</p>	<p>Appendix 6 sets out the contractor's checklist for all services Guild commission through third party providers.</p>
<p>A senior board level lead with the required knowledge, skills and expertise or sufficiently qualified and experienced to take leadership responsibility for the organisation's/agency's safeguarding arrangements.</p>	<p>The senior board level representative for Guild is Jocelin Caldwell.</p>
<p>A culture of listening to children and taking account of their wishes and feelings, both in individual decisions and the development of services.</p>	<p>Guild is a new organisation and aims to build a culture of listening to children. The children and young person version of this policy has been consulted on by our young people.</p>
<p>Clear whistleblowing procedures, which reflect the principles in <i>Sir Robert Francis - Freedom to Speak Up Review</i> and are suitably referenced in staff training and codes of conduct, and a culture that enables issues about safeguarding and promoting the welfare of children to be addressed.</p>	<p>Whistleblowing procedures can be found under policies on our website.</p>
<p>Clear escalation policies for staff to follow when their child safeguarding concerns are not being addressed within their organisation or by other agencies.</p>	<p>A Guild staff member can contact any one of the Designated Safeguarding Leads, a list of them can be found at Appendix 2, or the Board Lead for Safeguarding to escalate concerns.</p>
<p>Arrangements which set out clearly the processes for sharing information, with other practitioners and with safeguarding partners.</p>	<p>The procedure flowcharts for raising concerns at Appendix 1 sets out these arrangements for sharing information with safeguarding agencies.</p>
<p>A designated child safeguarding practitioner. Their role is to support other practitioners in their organisations and agencies to recognise the needs of children, including protection from possible abuse or neglect. Designated</p>	<p>Designated Safeguarding Leads (DSLs) receive an in-depth training programme which gives them the competence to identify and refer concerns to specialist services.</p>

<p>practitioner roles should always be explicitly defined in job descriptions. Practitioners should be given sufficient time, funding, supervision and support to fulfil their child welfare and safeguarding responsibilities effectively.</p>	<p>These DSLs are supervised by the <i>Designated Senior Manager (DSM)</i> for Safeguarding who is Kit Brunswick, and the Board Lead for Safeguarding Jocelin Caldwell. A list of DSLs can be found at Appendix 2.</p>
<p>Safe recruitment practices and ongoing safe working practices for individuals whom the organisation or agency permit to work regularly with children, including policies on when to obtain a criminal record check.</p>	<p>The <i>Safer Recruitment Guidance</i> sets out the Guild approach to recruiting to those roles working with children, young people and adults at risk.</p>
<p>Appropriate supervision and support for staff, including undertaking safeguarding training.</p>	<p>Safeguarding supervision is provided by DSLs, and an external specialist consultant. A programme of safeguarding training is offered to all staff, with a specific programme for those working with the players, and for the players on the pro and academy sides too.</p>
<p>Creating a culture of safety, equality and protection within the services they provide. Employers are responsible for ensuring that their staff are competent to carry out their responsibilities for safeguarding and promoting the welfare of children and creating an environment where staff feel able to raise concerns and feel supported in their safeguarding role.</p>	<p>The communication with our players, who include children, young people and adults at risk, as well as the safeguarding programme available to staff will help Guild build the culture of safety as the organisation grows. We believe it is vital to listen to and act on the views of children.</p> <p>We utilise TootToot safeguarding software. A QR Code is available to scan on all desktop computers and there is clear signage on how to use this. We also have a safeguarding induction with new players who are uploaded onto the system and sign a document indicating they are aware of their responsibilities and who to speak to regarding safeguarding and wellbeing concerns.</p>
<p>Staff should be given a mandatory induction, which includes familiarisation with child protection responsibilities and the procedures</p>	<p>New staff are given a safeguarding induction covering policies and reporting procedures. They can also</p>

to be followed if anyone has any concerns about a child's safety or welfare;	access training appropriate to their role.
All practitioners should have regular reviews of their own practice to ensure they have knowledge, skills and expertise that improve over time.	Safeguarding reviews of practice should be carried out by line managers of Designated Safeguarding Leads four times per year.

As an organisation which works with a further education programme through our College programme, Guild has additional responsibilities under the statutory guidance '[Keeping Children Safe in Education](#)', which is renewed annually. In the current 2022 version, Guild staff should be familiar with:

- Part 1 of the guidance which summarises safeguarding, the signs and indicators of concerns, and actions which should be taken;
- Part 3 of the guidance which deals with safer recruitment;
- Part 4 which addresses allegations against staff working in education; and
- Part 5 which highlights child on child abuse.

Specific vulnerabilities and considerations in Esports

FINANCIAL ABUSE

This is when a child is defrauded, exploited or otherwise placed under any financial pressure, including in the context of gaming. Financial abuse is usually a category of abuse reserved for adults at risk, however, professional players in Esports tend to be younger than in traditional sport. This means that some of the world's best players in some games are children, and they often are offered lucrative contracts and often employed via companies set up by the adults around them.

This can leave children vulnerable to exploitation by friends, family, strangers who target them online, or the esports teams who employ them. For this reason, Guilds are required to ensure that any children who are employed by Guild in any way, are safeguarded against exploitation, even if that money goes to a separate company, for example a limited company set up by the child's parents.

Section 11(2)(b) of the Children Act 2004 requires that any contractor Guild engages with meets the same safeguarding standards that we do. Therefore, the process of paying a young person's limited company for example instead of paying them via PAYE does not remove the responsibility on Guild to ensure that they are working within the requirements of the law.

Working hours is another important consideration. The maximum hours directed by the Government must be observed for Guild to comply with the law. [They can be found here.](#) We also have an open communication with Hackney Council on this subject. A summary of the relevant basic rules on working hours set out by the Government are set out in the table below.

Children are not allowed to work:	
<ul style="list-style-type: none">• without an employment permit issued by the local council, if this is required by local bylaws• during school hours• before 7am or after 7pm• for more than one hour before school (unless local bylaws allow it)• for more than 4 hours without taking a break of at least 1 hour• in any work that may be harmful to their health, well-being or education• without having a 2-week break from any work during the school holidays in each calendar year	
Term time rules:	School holiday rules:

During term time children can only work a maximum of 12 hours a week. This includes:

- a maximum of 2 hours on school days and Sundays
- a maximum of 5 hours on Saturdays for 13 to 14-year-olds, or 8 hours for 15 to 16-year-olds

13 to 14-year-olds are only allowed to work a maximum of 25 hours a week. This includes:

- a maximum of 5 hours on weekdays and Saturdays

- a maximum of 2 hours on Sunday

15 to 16-year-olds can only work a maximum of 35 hours a week. This includes:

- a maximum of 8 hours on weekdays and Saturdays

- a maximum of 2 hours on Sunday

(HM Government, 2022)

Guild staff who are responsible for organising events or activities that may involve children carrying out paid work must follow Guild's guidance 'Employing children: Considerations for planning events' and activities.

GROOMING

The nature of esports can bring about particular challenges for young gamers. These include the traditional e-safety considerations, such as the risk of [grooming](#) in the online world and how the potential to engage with young people in something they enjoy whilst communicating via instant messaging, voice communication or video chat coupled with the anonymity afforded to a potential abuser by the gaming environment. These advantages can be exploited by the groomer and build trust and could lead to potential abuse in the physical world if an abuser is able to build trust, or use threats and coercion, to arrange meetings.

Grooming can also be perpetrated by adults or other young people, or those who work with the young person. Guild is committed to recruiting safely, through the Safer Recruitment Policy. However, no policy is perfect and people who pose a risk to children could still find their way in. The online nature of many of Guild's activities allows for a significant amount of unsupervised access to children, young people and adults at risk through activities such as coaching and practice. It is therefore vital that we maintain a dialogue with our young people about the risk of grooming and the warning signs to look out for. The procedure at [Appendix 1](#) must be followed by anyone who has a concern about the behaviour of a member of staff or player towards a child, young person or adult at risk.

CHILD SEXUAL EXPLOITATION (CSE)

CSE is a form of child sexual abuse. Sexual abuse may involve physical contact, including assault by penetration (for example, rape or oral sex) or nonpenetrative acts such as masturbation, kissing, rubbing, and touching outside clothing. It may include noncontact activities, such as involving children in the production of sexual images, forcing children to look at sexual images or watch sexual activities, encouraging children to behave in

sexually inappropriate ways or grooming a child in preparation for abuse including via the internet.

CSE can occur over time or be a one-off occurrence and may happen without the child's immediate knowledge for example through others sharing videos or images of them on social media.

CSE can affect any child who has been coerced into engaging in sexual activities. This includes 16- and 17-year-olds who can legally consent to have sex. Some children may not realise they are being exploited for example they believe they are in a genuine romantic relationship.

BULLYING

[Bullying](#) can be particularly harmful in a gaming context. Bullying that is carried out in a digital context (*cyber bullying*) is often far more impactful than its face-to-face counterpart. The impact of bullying in the online world can be enduring, but also heightened by the pressured situations that can arise in a social and performance gaming context, whether the people involved are known to each other or not. Open voice communication features can allow for this to happen more often with less opportunity for moderation or supervision. With most players using headsets, it is hard for anyone to overhear, for example a parent, and almost impossible for the young person to avoid without leaving the game, which for many reasons may not be a realistic option for them in that moment. As with grooming, the other communication arrangements such as private coaching sessions, and instant message provides another platform for bullying to thrive.

MENTAL HEALTH, NEURODIVERSITY AND ISOLATION

The impact of the more toxic side of esports can have a significant impact on young people and their mental health. Whilst evidence of the long-term impact of gaming on mental health is sparse, there exists a keen debate on the positives and negative of gaming and screen time on the child and adolescent brain. Over exposure to negative communication in any context can lead to low mood, mental health concerns, addiction and at the most concerning end of the spectrum, suicidal ideation, suicide attempts and completion.

What is commonly accepted is that children who are more vulnerable to abuse tend to be more isolated and have a lower level of self-esteem. Positively, the online gaming space provides a place for isolated young people to go, especially if they struggle to socialise in the physical world for reasons of [low self-esteem](#) or other social/emotional needs.

Isolation can lead to young people being more vulnerable to issues such as [Radicalisation](#). Radicalisation is the process of grooming a person into believing an extremist view, or ideology, that often involves promoting violence and hatred. We have a legal duty to be vigilant to the signs of radicalisation and get young people support if we are concerned that they are at risk from becoming radicalised. For these reasons, the

time spent online and most importantly, *how it is spent* should be talked about by parents, young people and the staff and professionals working with them.

Encouragingly though, gaming has also been found to have a positive impact on children's mental health ([Przybylski, 2020](#); [Skripkauskaite et al, 2022](#)). Gaming can provide a safer space for children who are more [neurodivergent](#), for example those 15% of the population who see the world differently due to diagnosed (or undiagnosed) Autism Spectrum Conditions, ADHD or Dyslexia for example. Esports can provide a safe, controllable space with fewer variables than the traditional sports and social situations ([BBC, 2022](#)). Children with special educational needs or disabilities (SEND) can be three times more likely to experience abuse and far less likely to get support or even be noticed as a victim of abuse ([NSPCC, 2021](#)).

What this means for esports, is that esports can expect to welcome a more neurodiverse participant base, but with that comes a responsibility for Guild staff, players and parents to be more sensitive to the signs and indicators of abuse, especially when a young person's capacity to communicate about it may be reduced.

An additional challenge that the environment of esports brings, is the reduced or absent physical or face to face contact with the children and young people who participate in activities. Often safeguarding concerns are raised by noticing subtle signs, indicators in someone's behaviour or slight changes, perhaps eye contact becoming less frequent, maybe bruises that a person is trying to hide. With the relationship we have with many of our young people being across the digital space, this reduces the opportunities that our staff might have of spotting concerns. This means that we should be alert to the signals we do get, the potential that concerns will be more likely to be overheard through the mic of a young person's headset for example and not necessarily by staff. Peers and other players are most likely to notice concerns in the background when they are practising together. For this reason, it is essential that we provide all of our players, parents and staff at Guild education on how to spot the signs of a concern and what to do about it, as well as how to keep yourself safe.

DISCORD

Discord is an online communication platform that allows people to create spaces to interact with each other. As with many social communication platforms the key to using it safely is in the privacy settings and how the young person uses the platform. Advice from ['Net Aware' can be found here](#) on the basics of keeping users safe on Discord. Guild uses Discord to host workshops, coaching activities and communicating across the pro and Academy programmes. We use a code of conduct to ensure rules are in place to support users, as well as filtering systems to reduce offensive language that can be used in chats. Also, by working with parents, players and staff will support the young people using Discord to create a safer culture and raise concerns as they arise.

REMOTE COACHING AND ONLINE WORKING

Esports is by its nature often based online which opens up opportunities for coaches, experts and players from around the world to connect with each other, work and compete together. With these opportunities comes some risks that must be mitigated by strong recruitment and ID verification processes. For staff, this means that they should be recruited using the *Safer Recruitment Guidance*, and for players that we do all we can to verify identity to ensure people are who they say they are.

Fit for purpose reporting procedures for all safeguarding concerns and allegations much be supported by training and good supervision of those working with young people online.

AGE RESTRICTIONS

In the UK age restrictions and esports is not entirely straightforward. Advice on the subject of age restrictions in an esports context, published by [Bird and Bird \(2017\)](#), brings into question the inconsistent approach to age ratings in the UK when it comes to games. Some carry an age restriction such as those sold in a physical, boxed format, others such as downloads do not. Viewing mature content in games online also appears not to be covered by age restriction, whereas live in person screenings of game footage that is age restricted may be covered by the need for licensing.

Bird and Bird advise that 'a responsible esports organisations may take the view that, as a matter of best practice, a PEGI rating should nonetheless guide who they enable to spectate and introduce age restricting mechanisms accordingly e.g. requiring users to enter their date of birth.

Taking this advice into account, Guild will take a cautious approach to ensuring all players, parents and spectators understand the ratings of each game and will design their activities to ensure that parents and children are able to give informed consent before agreeing to take part in games.

AGE VERIFICATION

The online nature of esports leads to the potential for exploitation. Without seeing the physical person in front of us it can be difficult to verify the age and identity of the participant. To mitigate this risk, we contract the services of a specialist company to ensure the ages of our participants are verified as far as is practical.

We will also provide advice and guidance to our participants, their parents and our staff to ensure that any concerns about the behaviour or communication of other participants are raised through the safeguarding procedure at [Appendix 1](#).

CONSENT FOR IMAGES

Sharing images of children online carries potential risks. For example:

- children may become vulnerable to [grooming](#) if a photograph is shared alongside information that makes them identifiable. This includes: personal details; a tag with location information; visual details such as a school uniform
- inappropriate images of children may be shared online

- images may be copied, downloaded, screenshotted or shared by anyone
 - images of children may be adapted and used inappropriately
 - photos or videos may appear in internet search results
 - depending on the terms and conditions of using an online platform, the image may be owned by the platform once it's been posted. Platforms may then license images for use by third parties – such as for commercial purposes
 - each photo or video, and any comments on them, become a part of a child's public image. This may affect them later in life – for example, it may affect how they see themselves, or how they are viewed when applying for a job
- (Thinkuknow, 2018).

Before sharing images of children online, adults should consider how widely images may be shared, how long they may remain available and how this may affect the children's long-term wellbeing. For these reasons, all children must have consent given to share their image online in images that they can be identified in. More guidance on how to seek consent, store images and respond to social media or image related safeguarding concerns can be found in our '*Social Media, Streaming and Images Safeguarding Guidance*'.

EVENTS AND TOURNAMENTS

To ensure that safeguarding is a primary consideration, all events that Guild organise, online and offline, must be risk assessed by the organiser. The following documents must be used by event organisers:

- Overnight stays: Considerations for planning events and activities
- Overnight Events and Stays: An essential safety checklist.
- Social Media, Streaming and Images Safeguarding Guidance'.
- Employing children: Considerations for planning events and activities

The following issues should be considered and communicated when planning events such as tournaments, coaching, filming and offline events including trips and overnight stays.

- | | |
|---|--|
| ● Seeking consent to participate (children and young people). | ● Arrangements to reduce risks such as bullying and grooming. |
| ● Seeking consent for images to be captured and shared (children, young people and adults at risk). | ● Arrangements to comply with legislation and best practice for length of continuous playing and breaks. |
| ● Information and communication plan for age restrictions. | ● Contractors present and any checks that may be required. |
| ● Designated Safeguarding Leads (DSLs) for the event and how that will be communicated to participants. | ● Health and Safety assessment. |
| ● Supervision arrangements. | ● Codes of conduct as required. |
| ● Arrangements for wellbeing. | ● Specific considerations for particular events. |
| ● Arrangements to reduce risks such as bullying and grooming. | ● Safeguarding, security and Health and Safety assessments of 3 rd |

- Age verification.

party venues such as hotels, event spaces and travel facilities including airports.

When we're concerned

CONCERNS ABOUT CHILDREN, YOUNG PEOPLE OR ADULTS AT RISK

When a concern arises, our duties under the Children Act 1989 and 2004, as well as the Care Act 2004 and 2014 require that we refer our concerns to the local authority, or the police. The Designated Safeguarding Officers (DSOs) are responsible for making safeguarding referrals as a matter of priority, but always within no more than 24 hours of receiving it. Referrals to the local authority for concerns about a child, young person or adult at risk should be made to the authority where the person who the concern about is resident. If the person is outside of the UK, advice should be sought from the Head of Academy and Safeguarding.

ALLEGATIONS AGAINST STAFF

Any allegation or concern that an employee or volunteer has behaved in a way that has harmed, or may have harmed, a child must be taken seriously and dealt with sensitively and promptly, regardless of where the alleged incident took place.

In the event of a concern being raised about a person working with children or young people, Guild have a duty to refer the concern to the *Local Authority Designated Officer, or LADO*, within 24 hours. Referrals should be made by the Head of Academy and Safeguarding to the LADO in the *London Borough of Hackney*, their contact details can be found [here](#).

For allegations of sexual abuse made against a person working with children, the [position of trust](#) may apply. The law has changed in 2021 to include sports coaches in the category of position of trust which means that if the alleged victim (or survivor) is 16 or 17 and in the coach's care, the laws of sexual consent do not apply and it is considered an offence.

For situations where a crime is being committed, or a person is in immediate danger, the Police must be called on 999 by whoever observes the concern. Domestic abuse concerns, where a person is not at immediate risk of harm, should follow a different procedure. The National Domestic Violence Helpline can offer advice on the appropriate referrals to make. In summary, if a person discloses that they are experiencing domestic abuse, the DSL should carry out a *Domestic Abuse, Stalking and Harassment Risk Indicator Checklist (DASH RIC)*. Risk scores of above 14 must be referred to the Multi Agency Risk Assessment Conference (MARAC) for the area they are resident in. A referral to an Independent Domestic Violence Advocate (IDVA) is also advisable for someone scoring as a 10 or above on the checklist.

[Appendix 1](#) and [Appendix 3](#) sets out the procedures for raising safeguarding concerns.

Appendices

[Appendix 1. Procedure for raising safeguarding concerns](#)

[Appendix 2: Designated Safeguarding Leads](#)

[Appendix 3. Procedure for the Designated Safeguarding Lead, when a concern is raised](#)

[Appendix 4. Safeguarding concern form](#)

[Appendix 5. Definitions](#)

[Appendix 6. Contractors safeguarding responsibilities](#)

[Appendix 7. Code of Practice for our staff](#)

[Appendix 8. Code of Practice for players in all programmes](#)

[Appendix 9. Code of conduct for parents in all programmes](#)

[Reference](#)

Appendix 1. Procedure for raising safeguarding concerns

Recognise. The concern

If a child, young person or adult at risk have told you about abuse that is happening to them, or you see or hear something that concerns you, follow the next steps.
Remember, **do not agree to keep any secrets**, and consider the implications of seeking consent. It's usually the best way to do things but sometimes can increase the risk to the person you're worried about, and it can be a very difficult conversation. Seek advice if you're unsure.

Respond. Put yourself in their shoes, be open, be honest

Explain to the person you're worried about (unless this would cause more harm) that you will get some help and advice from the *Designated Safeguarding Lead (DSL)* for their department. A list can be found at [Appendix 2](#).
If the concern is about the behaviour of a member of staff towards child, young person or another adult contact the HR Director immediately.

Reassure them that *(if they have told you about the abuse)* they have done the right thing.

Refer. Get help and support

If someone is in immediate danger, or a crime is being committed call the Police on 999, otherwise contact the designated person for the appropriate department as soon as possible, tell the subject of the concern that you are doing this unless it would cause more harm.

Record. Write it down before you forget

Record the concern on Toot Toot, or if that's not possible contact the Head of Academy and Safeguarding ASAP.

Talk to someone

Helping someone with a safeguarding concern is one of the most important things you can do, but it's a lot to deal with so (without sharing any personal details of the person you've just helped), talk it through.
Ask one of the DSLs or HR Director if you need help finding someone.

Appendix 2. List of Designated Safeguarding Leads (DSLs)

Name	Department
Connor Higgins	Partnerships
Roland Tiffany	Creative
Ellen Topley	Partnerships
Sean Carr	Teams
James Stimson	Teams and Talent

Head of Academy and Safeguarding
Kit Brunswick

Performance Wellbeing and Safeguarding Consultant
Alex Hepton

Senior Safeguarding Manager (SSM)
Kit Brunswick

Board Lead for Safeguarding
Jocelin Caldwell

Appendix 3. Procedure for the DSLs, when a concern is raised

Receive. Thank the referrer for passing on the concern

Make sure you have a written version of what has happened, for urgent concerns this may have to wait so just be as clear as you can be on the facts. Next, consider who the concern is about. In cases involving multiple people, follow each process that applies.

The concern is about a child or young person under 18.

The concern is about an adult who works with children under the age of 18, or adults at risk.

The concern is about an adult at risk, or an adult who works with adults at risk

If a person is in immediate danger, or a crime is being committed, call the Police on 999.

Recognise

When deciding whether to refer to external agencies, consider the following questions:

Is there evidence of harm? (for example, this could be what a child or adult has told someone, what someone has witnessed, or in the case of domestic abuse a risk assessment score). If yes, what category of abuse is it?
Do you have consent to share the subject's information? If you do not have consent, you may lawfully share information if seeking consent would place the child at increased risk of harm, or if a child is at risk of significant harm, or a domestic abuse survivor scores over 14 on a risk assessment (DASH RIC).

If you decide to refer, **follow the next step (Refer)**.

If you decide the concern does not meet the threshold for external referral, consider what support Guild can provide internally or through partner agencies or external contractors. **Proceed to the final step (Record)**.

If you are unsure, contact the local authority children's or adult services for advice, or contact the NSPCC 0808 800 5000 for advice about child safeguarding concerns.

Refer

If the concern meets the Local Authority threshold for referral for a 'Child in Need', 'Child at Risk of Significant Harm' or 'Adult at Risk' follow their referral route. If you are unsure, contact the local authority for advice.

Refer

If the adult working with children (or adults at risk) has...
Behaved in a way that has harmed a child, or may have harmed a child
Possibly committed a criminal offence against or related to a child
Behaved towards a child or children in a way that indicates they may pose a risk of harm to children
Behaved or may have behaved in a way that indicates they may not be suitable to work with children.
Refer to the Local Authority Designated Officer (LADO) **within 24 hours** (or Adult Safeguarding Team for people working with Adults at Risk). Consent is not required - failure to refer is a breach of statutory guidance. After liaising with the LADO, if the case does not meet threshold Consider the Disciplinary Procedure. Upon conclusion, consider whether a referral to the DBS is required.

Refer

If the concern meets the local authority threshold for referral follow their referral route.

For Domestic Abuse concerns, follow the local Domestic abuse procedure or contact the National Domestic Violence Helpline on 0808 2000 247, or local domestic abuse advice services.

If you have carried out a DASH RIC assessment, you should refer survivors with a score of 10 to the local IDVA service, or for over 14 you must refer to the MARAC for the area the person lives in.

Record your actions, referrals, details of advice sought and your decisions on Toot Toot.

Talk. Helping someone with a safeguarding concern is one of the most important things you can do, but it's a lot to deal with so (without sharing any personal details of the person you've just helped), talk it through.

Appendix 4. REPLACE WITH TOOT TOOT

Create a New Incident Report

Everything below is optional, you don't have to fill in every box. However, the more the fill in, the better your reporting will be.

Victims	Aggressors	Participants
<input type="text" value="Start typing..."/>	<input type="text" value="Start typing..."/>	<input type="text" value="Start typing..."/>

Incident title

Incident details

Assign Officer

Kit Brunswick

Link officers into this incident

Incident date: 09/12/2022

Incident time (HH:MM): 16:10

Tag with a location: No location set

Would you like to mark this incident as resolved, or ongoing?

Ongoing

Attach evidence
e.g. photos, videos, or screenshots (max 100mb)

Members will never see incident reports that you create.

CREATE INCIDENT

Appendix 5. Definitions

SAFEGUARDING (CHILDREN)

[Working Together to Safeguard Children 2018](#) defines Safeguarding and promoting the welfare of children as:

- protecting children from maltreatment
- preventing impairment of children's mental and physical health or development
- ensuring that children grow up in circumstances consistent with the provision of safe and effective care
- taking action to enable all children to have the best outcomes

ABUSE

Abuse is defined by Working Together to Safeguard children (2018) as 'a form of maltreatment of a child. Somebody may abuse or neglect a child by inflicting harm, or by failing to act to prevent harm. Children may be abused in a family or in an institutional or community setting by those known to them or, more rarely, by others. Abuse can take place wholly online, or technology may be used to facilitate offline abuse. Children may be abused by an adult or adults, or another child or children¹.'

PHYSICAL ABUSE (CHILDREN)

A form of abuse which may involve hitting, shaking, throwing, poisoning, burning or scalding, drowning, suffocating or otherwise causing physical harm to a child. Physical harm may also be caused when a parent or carer fabricates the symptoms of, or deliberately induces, illness in a child.

EMOTIONAL ABUSE (CHILDREN)

The persistent emotional maltreatment of a child such as to cause severe and persistent adverse effects on the child's emotional development. It may involve conveying to a child that they are worthless or unloved, inadequate, or valued only insofar as they meet the needs of another person. It may include not giving the child opportunities to express their views, deliberately silencing them or 'making fun' of what they say or how they communicate. It may feature age or developmentally inappropriate expectations being imposed on children. These may include interactions that are beyond a child's developmental capability, as well as overprotection and limitation of exploration and learning, or preventing the child participating in normal social interaction. It may involve seeing or hearing the ill-treatment of another. It may involve serious bullying (including cyber bullying), causing children frequently to feel frightened or in danger, or the exploitation or corruption of children. Some level of emotional abuse is involved in all types of maltreatment of a child, though it may occur alone.

Bullying (children)

Bullying affects lots of people and can happen anywhere: at school, travelling to and from school, in [sporting](#) teams, in friendship or family groups or in the [workplace](#).

¹ Abuse by another child is called [Peer on Peer Abuse](#).

[The Anti Bullying Alliance](#) defines bullying as *the repetitive, intentional hurting of one person or group by another person or group, where the relationship involves an imbalance of power. It can happen face to face or online.* Young people in gaming often experience online hate or abuse based on their identity, for example many women and girls experience misogynistic hate, which often leads to them playing without their mics on to conceal who they are to reduce the abuse.

NEGLECT (CHILDREN)

The persistent failure to meet a child's basic physical and/or psychological needs, likely to result in the serious impairment of the child's health or development. Neglect may occur during pregnancy as a result of maternal substance abuse. Once a child is born, neglect may involve a parent or carer failing to:

- Provide adequate food, clothing and shelter (including exclusion from home or abandonment);
- Protect a child from physical and emotional harm or danger;
- Ensure adequate supervision (including the use of inadequate care-givers);
- Ensure access to appropriate medical care or treatment.

It may also include neglect of, or unresponsiveness to, a child's basic emotional needs.

SEXUAL ABUSE

Involves forcing or enticing a child or young person to take part in sexual activities, not necessarily involving a high level of violence, whether or not the child is aware of what is happening. The activities may involve physical contact, including assault by penetration (for example, rape or oral sex) or non-penetrative acts such as masturbation, kissing, rubbing and touching outside of clothing. They may also include non-contact activities, such as involving children in looking at, or in the production of, sexual images, watching sexual activities, encouraging children to behave in sexually inappropriate ways, or grooming a child in preparation for abuse. Sexual abuse can take place online, and technology can be used to facilitate offline abuse. Sexual abuse is not solely perpetrated by adult males. Women can also commit acts of sexual abuse, as can other children.

GROOMING

Grooming is when someone builds a relationship, trust and emotional connection with a child or young person so they can manipulate, exploit and abuse them. Children and young people who are groomed can be sexually abused, exploited or trafficked. Anybody can groom regardless of their age, gender or race. Grooming can take place over a short or long period of time – from weeks to years. Groomers may also build a relationship with the young person's family or friends to make them seem trustworthy or authoritative (NSPCC, 2021).

POSITION OF TRUST

A position of trust involves a person in a position of authority over another person. There is a need to protect young people aged 16 and 17 who, despite reaching the age of consent for sexual activity, are considered to be vulnerable to sexual abuse and exploitation, in defined circumstances. This includes sexual activity and relationships

with adults who hold a position of trust, responsibility or authority in relation to them and, as a result, have a considerable amount of power and influence in their lives. [Updated factsheet](#) from the Government in March 2021 to include sports coaches.

CHILD SEXUAL EXPLOITATION (CSE)

Child sexual exploitation (CSE) is a type of sexual abuse. The child or young person may be given things, like gifts, drugs, money, status and affection, in exchange for performing sexual activities. They can be often groomed into believing they're in a loving and consensual relationship and may trust their abuser, making it difficult for them to understand that they're being abused. CSE can involve children and young people being trafficked into, out of, or within the UK to be sexually exploited, for example by being moved around the country and abused by being forced to take part in sexual activities, often with more than one person. CSE can originate with online contact, or face to face through networks like criminal enterprises, such as gangs.. Abusers may use violence and intimidation to frighten or force a child or young person, making them feel as if they've no choice. They may lend them large sums of money they know can't be repaid or use financial abuse to control them.

Anybody can be a perpetrator of CSE, no matter their age, gender or race. The relationship could be framed as friendship, someone to look up to or romantic. Children and young people who are exploited may also be used to 'find' or coerce others to join groups

CHILD ON CHILD ABUSE

Child on child abuse includes, but is not limited to:

- physical and sexual abuse
- sexual harassment and violence
- emotional harm
- on and offline [bullying](#)
- teenage relationship abuse

[\(HM Government, 2022\)](#)

Peer on Peer Sexual Abuse

Peer-on-peer sexual abuse is sexual abuse that happens between children of a similar age or stage of development. It can happen between any number of children, and can affect any age group (Department for Education (DfE), 2018).

It can be harmful to the children who display it as well as those who experience it.

Children can experience peer-on-peer sexual abuse in a wide range of settings, including:

- at school
- at home or in someone else's home
- in public spaces
- online

[\(NSPCC, 2021\)](#)

ADULT AT RISK

[Section 42 of the Care Act 2014](#) defines an 'adult at risk' as an adult in who

- (a) has needs for care and support (whether or not the authority is meeting any of those needs),
- (b) is experiencing, or is at risk of, abuse or neglect, and
- © as a result of those needs is unable to protect himself or herself against the abuse or neglect or the risk of it.

SELF-NEGLECT (ADULTS)

This covers a wide range of behaviour, but it can be broadly defined as neglecting to care for one's personal hygiene, health, or surroundings. An example of self-neglect is behaviour such as hoarding.

MODERN SLAVERY (ADULTS)

This encompasses slavery, human trafficking, forced labour, and domestic servitude.

DOMESTIC ABUSE (ADULTS)

This includes psychological, physical, sexual, financial, and emotional abuse perpetrated by anyone within a person's family. It also includes so-called "honour" based violence.

DISCRIMINATORY ABUSE (ADULTS)

Discrimination is abuse that centres on a difference or perceived difference, particularly with respect to race, gender, disability, or any of the protected characteristics of the Equality Act. Young people in gaming often experience abuse with many women and girls experiencing misogynistic hate for example, which often leads to them playing without their mics on.

ORGANISATIONAL ABUSE (ADULTS)

This includes neglect and poor care practice within an institution or specific care setting, such as a hospital or care home, or in relation to care provided in one's own home. Organisational abuse can range from one off incidents to ongoing ill-treatment. It can be through neglect or poor professional practice as a result of the structure, policies, processes and practices within an organisation.

PHYSICAL ABUSE (ADULTS)

This includes hitting, slapping, pushing, kicking, restraint, and misuse of medication. It can also include inappropriate sanctions.

SEXUAL ABUSE (ADULTS)

This includes rape, indecent exposure, sexual harassment, inappropriate looking or touching, sexual teasing or innuendo, sexual photography, subjection to pornography or witnessing sexual acts, indecent exposure and sexual assault, or sexual acts to which the adult has not consented or was pressured into consenting.

FINANCIAL OR MATERIAL ABUSE (ADULTS)

This includes theft, fraud, internet scamming, and coercion in relation to an adult's financial affairs or arrangements, including in connection with wills, property, inheritance or financial transactions. It can also include the misuse or misappropriation of property, possessions, or benefits.

NEGLECT AND ACTS OF OMISSION (ADULTS)

This includes ignoring medical or physical care needs and failing to provide access to appropriate health social care or educational services. It also includes the withdrawing of the necessities of life, including medication, adequate nutrition, and heating.

EMOTIONAL OR PSYCHOLOGICAL ABUSE (ADULTS)

This includes threats of harm or abandonment, deprivation of contact, humiliation, blaming, controlling, intimidation, coercion, harassment, verbal abuse, isolation, or withdrawal from services or supportive networks.

Bullying (Adults)

Bullying affects lots of people and can happen anywhere: at school, travelling to and from school, in [sporting](#) teams, in friendship or family groups or in the [workplace](#).

There is no legal definition of bullying. But it is usually defined as repeated behaviour which is intended to hurt someone either emotionally or physically and is often aimed at certain people because of their race, religion, gender or sexual orientation or any other aspect such as appearance or disability.

Bullying can take many forms including:

- physical assault
- social bullying
- threatening behaviour
- name calling
- cyberbullying

[\(Bullying UK, 2021\)](#)

CYBER BULLYING

Cyber bullying occurs when someone repeatedly makes fun of another person online, or repeatedly picks on another person through emails or text messages. It can also involve using online forums with the intention of harming, damaging, humiliating, or isolating another person. It includes various different types of bullying, including racist bullying, homophobic bullying, or bullying related to special education needs and disabilities. The main difference is that, instead of the perpetrator carrying out the bullying face-to-face, they use technology as a means to do it.

FORCED MARRIAGE

This is a term used to describe a marriage in which one or both of the parties are married without their consent or against their will. A forced marriage differs from an arranged marriage, in which both parties' consent to the assistance of a third party in identifying a spouse. The Anti-Social Behaviour, Crime and Policing Act 2014 make it a criminal offence to force someone to marry.

MATE CRIME

A “mate crime” is when “vulnerable people are befriended by members of the community who go on to exploit and take advantage of them” (Safety Network Project, ARC). It may not be an illegal act, but it still has a negative effect on the individual. A mate crime is carried out by someone the adult knows, and it often happens in private. In recent years there have been a number of Serious Care Reviews relating to people with a learning disability who were seriously harmed, or even murdered, by people who purported to be their friend.

RADICALISATION

The aim of radicalisation is to inspire new recruits, embed extreme views and persuade vulnerable individuals to the legitimacy of a cause. This may be direct through a relationship, or through social media. Online environments such as user generated games and communication platforms as well as streaming and video sharing platforms are often used to identify and groom young people who are more at risk of radicalisation, manipulating them into believing extreme beliefs such as far right or racist propaganda as well as ideologies such as Incel, which is short for 'Involuntary Celebate'.

Appendix 6. Contractors safeguarding responsibilities

When assessing contractor's suitability to provide services for Guild, we should be observant of the provisions within section 11 of the Children Act, 2004. In summary, provider's safeguarding provisions should be as rigorous as Guild's safeguarding arrangements. This principle however should be proportionate to the service being contracted and how it will be carried out. For example, it may not be reasonable to expect a sole trader providing a one-off repair to the boiler when no children are on site to have a suite of safeguarding policies available, it would however if that contractor was to provide regular services and be on the same premises as young people regularly.

The following table can be used by contract managers (staff who appoint the contractor) to establish the appropriate level of rigour to assessing the provision of contracted services. As the levels increase, the expectations of how thorough each criterion is met should increase. For example, for *appropriate supervision and support for staff, including undertaking safeguarding training* a 'level 1' service provider may have some basic training to meet this category, whereas a 'level 3' contractor would be expected to evidence in depth training, and possibly safeguarding supervision by more experience practitioners.

Level	Frequency of contact with children, young people and adults at risk	Example services.	DBS Required?
1	One off, or very infrequent, less than once per month. Supervised or no contact with children, young people or adults at risk.	Contractors providing repair or building work.	No
2	1 to 3 contacts with the same child in a month, the service provider will have supervised or occasional unsupervised contact with children, young people or adults at risk (online or offline), this could include contractors who provide information-based services such as online platforms.	Guest coaches, presenters, media staff, workshop providers, people with access to children, young people or adults at risk's information.	Yes - Confirmation from the contractor that they check the staff working with Guild to the appropriate level of check for their role.
3	Potential for weekly contact or more than 3 contacts (online or offline) in a single month with the same child, young person or adult at risk in a month, or overnight. Unsupervised or supervised.	Coaches, psychological services, medical services, caretaking/facilities services.	

S11 Outcome	Level 1	Level 2	Level 3
A clear line of accountability for the commissioning and/or provision of services designed to safeguard and promote the welfare of children;	✓	✓	✓
A senior board level lead with the required knowledge, skills and expertise or sufficiently qualified and experienced to take leadership responsibility for the organisation's/agency's safeguarding arrangements;			✓
A culture of listening to children and taking account of their wishes and feelings, both in individual decisions and the development of services;			✓
Clear whistleblowing procedures, which reflect the principles in Sir Robert Francis - Freedom to Speak Up Review and are suitably referenced in staff training and codes of conduct, and a culture that enables issues about safeguarding and promoting the welfare of children to be addressed;		✓	✓
Clear escalation policies for staff to follow when their child safeguarding concerns are not being addressed within their organisation or by other agencies;	✓	✓	✓
Arrangements which set out clearly the processes for sharing information, with other practitioners and with safeguarding partners;		✓	✓
A designated child safeguarding practitioner. Their role is to support other practitioners in their organisations and agencies to recognise the needs of children, including protection from possible abuse or neglect. Designated practitioner roles should always be explicitly defined in job descriptions. Practitioners should be given sufficient time, funding, supervision and support to fulfil their child welfare and safeguarding responsibilities effectively;		✓	✓
Safe recruitment practices and ongoing safe working practices for individuals whom the organisation or agency permit to work regularly with children, including policies on when to obtain a criminal record check;	✓	✓	✓

Appropriate supervision and support for staff, including undertaking safeguarding training;	✓	✓	✓
Creating a culture of safety, equality and protection within the services they provide.		✓	✓
Employers are responsible for ensuring that their staff are competent to carry out their responsibilities for safeguarding and promoting the welfare of children and creating an environment where staff feel able to raise concerns and feel supported in their safeguarding role;		✓	✓
Staff should be given a mandatory induction, which includes familiarisation with child protection responsibilities and the procedures to be followed if anyone has any concerns about a child's safety or welfare;	✓	✓	✓
All practitioners should have regular reviews of their own practice to ensure they have knowledge, skills and expertise that improve over time.			✓

Appendix 7. Code of Practice for our staff

Guild's ambition is to build a culture of excellence, by developing a best-in-class esports team, and establish a unique, UK-based talent pipeline for esports athletes, based on the traditional sports academy model. Youth talent will be coached and mentored by industry leaders to enhance their skill sets for professional competition. To achieve this goal and to create the culture we want, we expect that our staff to...

- Develop relationships with the young people they work with based on consent, openness, honesty, mutual trust and respect.
- Agree, respect and maintain professional boundaries. This includes never contacting young people in their private time and always seeking parental consent for using their child's personal contact details.
- Report concerns they have about children, young people or adults at risk through the safeguarding procedures. This includes concerns or allegations about the behaviour of staff.
- Take the time to understand the young people we work with.
- Create an environment where our young players can be challenged to perform, develop and grow in a safe and open way.
- Promote and role model talking about difficulties, worries and challenges.
- Encourage our young people to influence what we do and how we do it at Guild by asking their opinion and getting them involved in decision making as much as possible.
- Promote a balanced lifestyle, making sure our young players are not practising too much and access a healthy diet and change of environment.
- Celebrate diversity and never discriminate on the grounds of gender, marital status, race, colour, disability, sexual identity, age, occupation, religious beliefs or political opinion.
- 'Call in' discriminatory language, never allow any form of discrimination to go unchallenged.
- 'Call out' bullying. It's not ok and should never be ignored.
- Never publicly criticise or engage in demeaning descriptions of others.
- Always be discreet in any conversations about participants, coaches or any other individuals.
- Communicate with and provide feedback to participants in a way that reflects our values and shows respect and care.
- Treat everyone with respect all of the time, online and offline.
- Avoid lone working situations wherever possible, if necessary, agree it with your supervisor.
- Never have children or young people in their cars or homes.

Appendix 8. Code of conduct for players in all programmes

Guild's ambition is to build a culture of excellence, by developing a best-in-class esports team, and establish a unique, UK-based talent pipeline for esports athletes, based on the traditional sports academy model. Youth talent will be coached and mentored by industry leaders to enhance their skill sets for professional competition.

To achieve this goal and to create the culture we want, we expect that our players to...

- Dream huge! You're in a great place to reach your goals, try your best to make the most of the potential and opportunity you have.
- Develop relationships with your coach and the staff working with you. Be open, honest and show respect (even when you disagree!).
- Talk to someone if you're worried about your teammates, or how a member of staff is behaving towards you or someone else through the safeguarding procedures.
- Try to be you as much as you can, we can help you thrive the more you let us get to know you.
- Challenge yourself to perform, develop and grow in a safe and open way, by this we mean give every practice and tournament everything you've got and try your best to be open about where you need to develop.
- Ask for help if you need it, with your performance but also with life, your thoughts and feelings. It will help you grow as a person and become an even better player.
- Try to influence what we do and how we do it at Guild by giving your thoughts and opinions and get involved in planning and decision making as much as possible.
- Try to have a balanced lifestyle, make sure you're not practising *too much*, eat a healthy diet and change of environment – get outside for breaks and mix up your training.
- Celebrate diversity and never use offensive language such as words that relate to gender, marital status, race, colour, disability, sexual identity, age, occupation, religious beliefs or political opinion.
- 'Call in' discriminatory language, never allow any form of discrimination to go unchallenged.
- 'Call out' bullying. It's not ok and should never be ignored.
- Be kind. Treat everyone with respect all of the time, online and offline and never publicly criticise or engage in demeaning descriptions of others.

Appendix 9. Code of conduct for parents in all programmes

Guild's ambition is to build a culture of excellence, by developing a best-in-class esports team, and establish a unique, UK-based talent pipeline for esports athletes, based on the traditional sports academy model. Youth talent will be coached and mentored by industry leaders to enhance their skill sets for professional competition.

To achieve this goal and to create the culture we want, we expect that our player's parents to...

- Encourage your child to dream huge! They're in a great place to reach their goals, so try your best to help them by understanding more about esports, their games and what they do.
- Develop relationships with your child's coach and the staff working with them. Be open, honest and show respect (even when you disagree!).
- Talk to someone if you're worried about your child, or how a member of staff is behaving towards them or someone else through the safeguarding procedures.
- Encourage your child to be themselves, we can help them to thrive the more we get to know them.
- Encourage your child to challenge themselves to perform, develop and grow in a safe and open way, by this we mean give every practice and tournament everything they've got and encourage they be open about where they need to develop.
- Encourage your child to ask for help if they need it, with performance but also with life, their thoughts and feelings. It will help them to grow as a person and become a even better player.
- Encourage your child to influence what we do and how we do it at Guild by giving us their thoughts and opinions and get involved in planning and decision making as much as possible.
- Make sure they have a balanced lifestyle, making sure they're not practising too much, getting a break, eating a healthy diet and having a change of environment – getting outside for breaks and mixing up training to focus on physical wellbeing.
- Celebrate diversity and never use offensive language such as words that relate to gender, marital status, race, colour, disability, sexual identity, age, occupation, religious beliefs or political opinion.
- 'Call in' discriminatory language, never allow any form of discrimination to go unchallenged.
- 'Call out' bullying. It's not ok and should never be ignored.
- Be kind. Treat everyone with respect all of the time, online and offline and never publicly criticise or engage in demeaning descriptions of others.
- Role model dealing with problems, disagreements and challenges but also help them when they're struggling with performance. Show them how to be a gracious in defeat and modest in victory.

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