DIGITAL CONTENT CREATION AND ONLINE COMMUNICATION

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1. INTRODUCTION

Overworld AMP ("The Provision") uses age-appropriate content creation and for older learners, digital engagement activities, to support the development of a broad range of skills, including planning, scripting, media production, editing, communication, collaboration, digital literacy, and responsible online behaviour. Digital platforms are used in a manner consistent with statutory safeguarding guidance, platform age requirements, and the expectations of the Online Safety Act 2023, ensuring transparency and assurance for parents, commissioners, and regulatory bodies.

Activities are carefully planned, risk assessed and embedded within the curriculum to ensure they contribute directly to educational outcomes and do not function as unsupervised social media use. They are mapped to recognised accreditation routes, including ASDAN and the AQA Unit Award Scheme, and provide opportunities to develop literacy, technical competence, confidence, emotional regulation, teamwork, and employability-related skills.

Safeguarding, legal compliance, and learner wellbeing are prioritised at all times.

2. PURPOSE

The intent of this policy is to ensure that digital content creation and online communication activities are used safely, lawfully, and purposefully as part of the curriculum, while protecting learners from harm, inappropriate exposure, and unsupervised public interaction. The Provision is clear that digital platforms are educational tools, not social media environments.

This policy sets out the legal framework, safeguarding controls, and operational procedures governing the use of platforms including YouTube-style media, supervised livestreaming, messaging and collaboration tools, and immersive technologies. It defines clear roles and responsibilities for staff, establishes age-appropriate and risk-assessed use, and ensures consistent supervision, monitoring, and intervention where required.

3. SCOPE

This policy applies to all staff, visiting professionals, and learners engaged in digital content creation or communication activities within the Provision. It includes, but is not limited to, the use of YouTube, Discord, Twitch, Meta (Oculus) VR, and any other digital tools used as part of the educational programme. The policy also applies to offsite or remote delivery where learners are accessing these tools through Provision-supported channels.

4. LEGAL FRAMEWORK

The creation of digital content as part of the curriculum is governed by UK safeguarding law, statutory duties for schools and alternative provision, and platform-specific Terms of Service. This policy is informed by the following legislation and statutory guidance:

- Education Act 2002
- Children Act 1989
- Children Act 2004
- Keeping Children Safe in Education (KCSIE, 2026)
- Working Together to Safeguard Children (2023)
- DfE Guidance: Teaching Online Safety in Schools
- The Prevent Duty (Counter-Terrorism and Security Act 2015)
- Safeguarding Vulnerable Groups Act 2006
- Sexual Offences Act 2003 (including offences relating to indecent images and online abuse)
- Malicious Communications Act 1988

- Communications Act 2003 (including online harms offences)
- Online Safety Act 2023 (duties on platforms and protections for children)
- Defamation Act 2013
- Data Protection Act 2018
- UK General Data Protection Regulation (UK GDPR)
- Human Rights Act 1998 (Article 8 – right to privacy)
- Equality Act 2010

4.1 Platform Terms of Service (YouTube, Twitch, TikTok, Meta And Others)

While not statutes, the Terms of Service of major social media platforms create *legal and safeguarding constraints* on how young people may engage with content. General Social Media Principles across all platforms:

- Under-13s may not legally hold accounts.
- Providers must apply the Online Safety Act 2023 expectations to minimise exposure to harmful content and online risks.
- Content creation must not expose young people to public interaction, data harvesting, or contact from unknown individuals.

YouTube

- Users must be 13+ to own or manage a channel.
- Children under 13 may appear in videos but cannot legally manage an account.
- YouTube provides no private messaging; interactions are limited to public comments (which can be disabled).

Twitch

- Twitch requires users to be 13 or older to create or manage an account, in line with US COPPA regulations, which are recognised by UK online-safety standards.
- Young people aged 13–17 may only use Twitch with parental/guardian permission and must comply with age-appropriate safety settings.
- Children under 13 cannot own or operate a Twitch account, nor can they livestream or participate in chat features.

Discord

- Children under 13 are not permitted to create Discord accounts or access Discord services under the platform's Terms of Service.
- Users aged 13–17 are permitted to use Discord subject to age-appropriate settings and applicable child data protection requirements.
- Discord provides features including direct messaging, group messaging, voice channels, and servers as part of its standard service.

Oculus Virtual Reality (Meta)

- Meta requires users to be 13 or older to hold a Meta account and access Oculus/Meta VR services.
- Some Meta VR experiences are restricted to users aged 18+ due to immersive content, social interaction, or safeguarding concerns.
- Oculus VR environments often include live voice communication, shared virtual spaces, and interaction with unknown users, presenting elevated safeguarding risks.
- Use by young people aged 13–17 requires adult supervision, restricted settings, and careful selection of age-appropriate, non-social experiences.

5. THE PROVISION'S POSITION

5.1 Content creation and digital platform use within the Provision are educational tools, not social media activities.

5.2 The majority of learners — and all learners under the age of 13 — complete the content creation process without uploading material to YouTube or any public-facing platform.

5.3 Uploading content is optional and is only permitted where it is:

- Educationally purposeful
- Risk assessed
- Appropriately supervised

5.4 The Provision retains the right to decline, restrict, disable, or remove content where uploading is deemed unsafe, inappropriate, or unsuitable for the individual learner.

5.5 Parents or guardians must provide explicit written consent for any learner under the age of 16 to:

- Operate a personal YouTube channel onsite, or
- Engage in livestream-style activity (e.g. Twitch)

5.6 The Provision does not facilitate or support uploading to other social media platforms.

5.7 Learners under the age of 13 cannot own, operate, or directly manage social media accounts within the Provision.

5.8 Learners aged 13–15 may only work on personal content or platform-based activity within the Provision with parental consent and enhanced safeguarding controls.

6. ROLES AND RESPONSIBILITIES

6.1 **Senior Leadership Team (SLT):** Oversees implementation, compliance, and review of this policy.

6.2 **Designated Safeguarding Leads (DSL/DDSL):** Ensures safeguarding procedures are followed across all platforms and intervenes where concerns arise.

6.3 **Curriculum Leads:** Integrate platform use into curriculum safely and appropriately.

6.4 **Support Staff:** Supervise learners during all digital content creation activities and report concerns in line with the Safeguarding Policy.

6.5 **Young People** are encouraged to engage with digital platforms in line with their age, consent status, and the safety guidance provided.

6.6 **Parents/Carers** will need to provide explicit written consent for learners under 16 to access or engage with online platforms.

7. SAFEGUARDING ARRANGEMENTS - YOUTUBE

The Provision applies the following procedures:

7.1 Curriculum-Focused Creation (Default Model)

- Learners plan, script, film, and edit YouTube content as part of a structured curriculum process.
- Staff supervise all stages to ensure digital safety and appropriate content.
- Completed videos are stored securely (e.g., Google Drive) and shared only with parents/guardians where appropriate.

7.2 Upload Restrictions for Learners Under 13

Under-13s cannot upload videos themselves. If uploading is educationally valuable, videos are uploaded by staff or parents to a channel controlled by an adult. Videos are set to UNLISTED or PRIVATE:

- Unlisted videos are viewable only by individuals who are provided with the direct link by the content creator or the Provision. This setting is used only where the young person cannot be personally identified—for example, recordings of gameplay without voice, image, or identifiable information. Unlisted videos cannot be located through YouTube search functions and do not appear on the public-facing areas of the channel.
- Private: viewable only by specifically authorised accounts. The videos also do not show up on the main channel even with access to the channel, see fig 1.

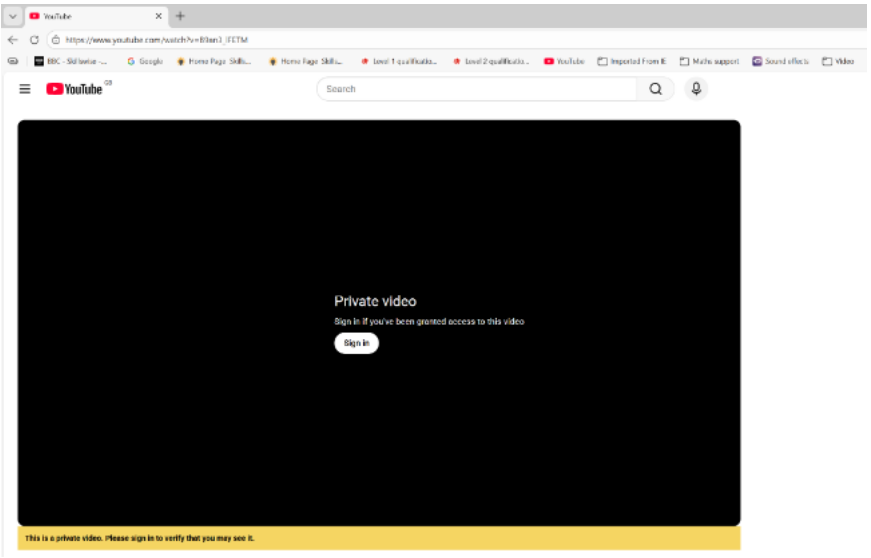

Fig 1. Example of a video set to private, accessed via a unique link

If a video link is shared beyond the intended audience—for example, if a friend passes the link to a third party, and this raises a concern for parents or the commissioner, the Provision can immediately disable the video on the channel. Once disabled, the existing link becomes inactive and the content can no longer be accessed.

7.3 Upload Controls for Learners Aged 13–16

Young people aged 13 and over may legally operate and upload content to their own YouTube channels, including livestreams, provided parental or guardian consent has been granted. Learners may work on their channels onsite where this contributes meaningfully to their curriculum goals and where it is deemed safe and appropriate. To ensure robust safeguarding, these learners receive enhanced digital safety education, covering:

- Cybersecurity
- Safe communication
- Online behaviour
- Dealing with cyberbullying
- Understanding data privacy and oversharing risks

Staff monitor wellbeing, behaviour, and digital engagement.

7.4 Comment and Interaction Restrictions

- All comments are turned OFF on uploaded content.
- No learner under 16 may use YouTube's interaction features at the Provision.
- Staff and parents are advised never to enable comment functionality on learner-produced content.

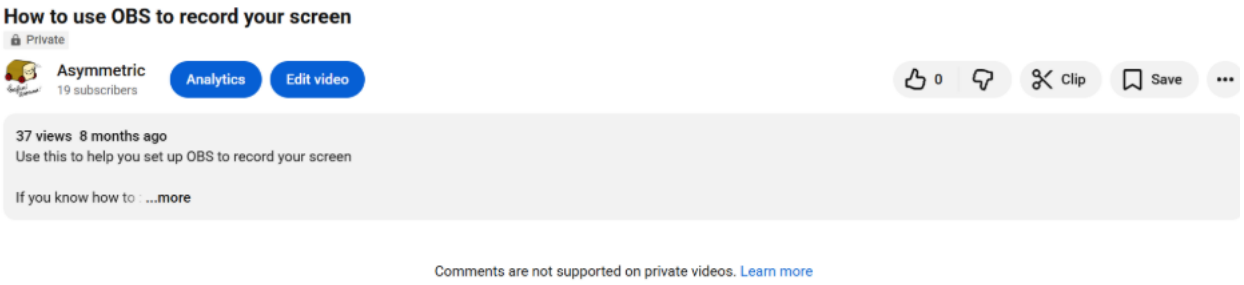

Fig 2. Example view if comments feature is disabled

7.5 Behavioural and Emotional Monitoring

- Staff observe emotional regulation, behaviour, and engagement during content creation.
- Any distress, anxiety, withdrawal, or harmful interaction is recorded as a safeguarding flag on MyConcern (Young Person Protection policy).
- Parents and commissioners are informed of concerns, and content may be removed immediately if needed.

7.6 Recording and Oversight

- Any learner with a personal channel has this noted in their documentation.
- The Provision monitors for changes in mood, attendance, or wellbeing that may relate to digital activity.
- Content can be disabled or removed instantly if concerns arise.

8. SAFEGUARDING ARRANGEMENTS – DISCORD

Discord is used within the Provision as a supervised communication and collaboration tool to support curriculum delivery, 1:1 mentoring, and course-based learning. It is not used as a social networking platform.

8.1 Account Management and Access

- All staff use Overworld AMP–specific Discord accounts for professional purposes.
- Staff do not communicate with learners using personal Discord accounts.
- Learners are only granted access to Discord where it is educationally necessary, age-appropriate, and risk assessed.
- Young people under the age of 13 do not hold Discord accounts and do not access Discord services within the Provision.

8.2 Communication

- Discord is used for scheduled 1:1 online sessions between learners and mentors, functioning in a similar manner to other video or messaging platforms used in education.
- Communication takes place through direct messaging or supervised voice channels, solely for curriculum-related purposes.
- Professional boundaries are maintained at all times, and communication is restricted to appropriate hours and contexts.

8.3 Course-Based Discord Servers

- Where required, the Provision's own managed Discord servers are created for specific courses or projects.
- Access to these servers is restricted and invitation-only, limited to enrolled learners and relevant staff.
- Learners within course-based servers:
  - Are known to one another
  - Are introduced through teaching staff
  - Share a clear educational purpose for participation

- Servers are not public, are not discoverable, and do not permit external users.

8.4 Monitoring and Oversight

- All Discord communication, including messages posted on boards or channels, is automatically logged by the platform.
- Mentoring and teaching staff actively monitor communication to ensure interactions remain appropriate, respectful, and safe.
- Staff are vigilant to changes in tone, behaviour, or engagement that may indicate distress, boundary issues, or safeguarding concerns.

8.5 Safeguarding Response

Any safeguarding concerns identified through Discord communication are:

- Acted upon immediately
- Recorded in line with the Young Person Protection and Safeguarding Policy
- Escalated to the Designated Safeguarding Lead where required

The Provision retains the right to restrict access, remove learners from servers, or suspend Discord use where concerns arise.

9. SAFEGUARDING ARRANGEMENTS – TWITCH

Twitch is used within the Provision as a controlled educational tool to support curriculum-linked activities such as content creation, broadcasting skills, and digital literacy. It is not used as a recreational or social streaming platform.

9.1 Account Management and Access

- Learners under the age of 13 do not hold or operate Twitch accounts within the Provision.
- Learners aged 13–15 may only access Twitch-related activity with explicit parental or guardian consent and where this has been risk assessed.
- Staff do not use personal Twitch accounts to interact with learners.

9.2 Educational Use

- Twitch activity is limited to curriculum-relevant objectives, such as understanding livestream formats, audience management, and digital production skills.
- Livestreaming is only permitted where it is planned, supervised, and approved as part of a learning activity.

9.3 Interaction Controls

- Interactive features, including live chat, are disabled or tightly controlled for learners under 16.
- Learners are not permitted to engage with unknown members of the public through Twitch while onsite.
- The Provision retains the right to pause, end, or disable streams immediately if safeguarding concerns arise.

9.4 Monitoring and Safeguarding Oversight

- All Twitch activity undertaken within the Provision is actively supervised by staff.
- Staff monitor learner wellbeing, behaviour, and emotional response throughout streaming or viewing activities.
- Any safeguarding concerns are recorded and escalated in line with the Young Person Protection and Safeguarding Policy.

10. SAFEGUARDING ARRANGEMENTS – OCULUS VIRTUAL REALITY (META)

Oculus / Meta virtual reality is used as a supervised learning technology to support engagement, creativity, and curriculum-based exploration. It is not used as an unsupervised social or gaming environment.

10.1 Account Management and Age Controls

- By default, VR headsets are logged into an Overworld AMP–managed Meta account, configured to the appropriate age of the learner.
- Learners do not use personal Meta accounts unless they are aged 13 or over and this has been specifically risk assessed and approved.

10.2 Real-Time Monitoring

- All VR activity is webcast in real time to a monitoring device, enabling the learner's support worker to see and hear exactly what the learner is experiencing.
- This provides continuous supervision of visual content, audio, interaction, and emotional response.
- Staff can intervene immediately, pause sessions, or remove the headset if content or interaction becomes inappropriate or overwhelming.

10.3 Social Interaction Controls (Learners Aged 13+)

- Where learners aged 13+ access their own Meta accounts, their friends list and social settings are monitored.
- If a contact is online, the appropriateness of any interaction is monitored in real time by staff.
- Friend requests are not accepted during sessions at the Provision, and learners are not permitted to add new contacts onsite.

10.4 Safeguarding Response

- Learners are not permitted to access open, unmoderated social VR spaces unless this is explicitly risk assessed, age appropriate, and supervised.
- Any safeguarding concerns identified during VR use are:
  - Acted upon immediately
  - Recorded in line with safeguarding procedures
  - Escalated to the Designated Safeguarding Lead where required

11. MONITORING AND REVIEW

This policy is reviewed annually by the Senior Leadership Team (SLT).

Updates are made in response to changes in legislation, safeguarding guidance, or contractual obligations.

Staff are trained to understand the distinction between law, parental consent, terms of service agreements for platforms and safeguarding practice, ensuring consistent application across the Provision.