GAMING

V2 SEPTEMBER 2026

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Review Date	August 2027

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Version 2 Sep 26	Policy restructured and updated in line with current safeguarding guidance.

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1. PURPOSE

This policy sets out Overworld AMP Limited's (the Provision) position on young people accessing age rated video games. The Provision uses gaming as one of a range of engagement and learning tools to support education, social development, emotional regulation and the development of transferable skills. Gaming activities are planned, supervised and delivered within the Provision's safeguarding framework. The policy clarifies the legal framework, outlines the responsibilities of the Provision as a provider, and embeds safeguarding processes alongside daily monitoring of wellbeing and educational progress.

2. SCOPE

This policy applies to all staff, volunteers, contractors, visitors, parents, carers and young people accessing services provided by the Provision.

It applies to all gaming activities delivered by or on behalf of the Provision, whether undertaken:

- on the Provision's premises;
- at an alternative location as part of a planned activity; or
- remotely using approved platforms.

This policy should be read alongside the Provision's *Young Person Protection Policy*, *Online Safety Policy, Digital Content Creation and Online Communication Policy*, and individual risk assessments where applicable.

3. LEGAL FRAMEWORK

This policy has been developed with regard to:

- Keeping Children Safe in Education (KCSIE) 2026;
- Working Together to Safeguard Children 2026;
- Video Recordings Act 1984 (as amended)
- PEGI (Pan European Game Information) age classification system;
- British Board of Film Classification (BBFC) guidance for educational settings.

PEGI ratings for games and BBFC ratings for films are advisory classifications. The statutory law applies specifically to the sale and supply of age restricted content.

It is a criminal offence for a retailer to sell or supply an age restricted game to someone below the specified age.

There is no statutory prohibition on use or play of age rated games by underage learners, provided the game was legally purchased or accessed.

Parents may legally permit their young person to access age rated content, and this falls within parental responsibility under UK Law.

The BBFC give guidance around the use of linear media to learners under the age of rating when used within an educational framework stating "*It is not illegal for schools to show their students a movie that is rated higher than the age of the pupils in the class. This is because merely showing an age-restricted film to an underaged person is not an offence.*"

Although this is different if young people are accessing content offsite as instances such as a cinema trip where the young person does not meet the age of classification is a criminal offence.

Please see *Appendix 1 – Useful References* more information.

4. THE PROVISION'S POSITION

The Provision does not sell or distribute age rated games.

Young people may access such games where parents have provided written consent. However, the Provision reserves the right to make a final assessment if it believes it inappropriate or damaging for the young person's wellbeing to access such games.

The Provision recognises that schools may set their own Terms of Service (ToS) restricting access, but these are contractual obligations rather than statutory law.

- If a school requires the Provision to enforce restrictions, this must be explicitly documented in the service agreement.
- The Provision operates within the law, respects parental consent, and aligns with school policy where it is clearly agreed.

5. SAFEGUARDING ARRANGEMENTS

Due to the complex needs of the young people attending the Provision and recognising that many may already lawfully access age-rated games at home with parental consent, there are occasions where the Provision may make reasonable adaptations in a young person's best interests to support wider educational, social and emotional outcomes.

The Provision applies the following safeguards to promote young people's wellbeing and minimise risk:

5.1 Consent Verification

Written parental consent is required and securely recorded before young people access age rated games.

5.2 Daily Monitoring

Staff monitor each young person's wellbeing, engagement and response to gaming activities as part of the Provision's ongoing educational and safeguarding practice.

Monitoring may include:

- emotional wellbeing and self-regulation;
- engagement with learning and activities;
- behaviour during and following gameplay;
- social interaction and communication; and
- any safeguarding or welfare concerns.

Any concerns are recorded and responded to in accordance with the Provision's Young Person Protection Policy and Behaviour Policy.

5.3 Behavioural Oversight

Young people's behaviour during and after gameplay is observed and recorded. Any concerns e.g. distress, aggression, withdrawal, are logged as safeguarding flags.

5.4 Collaborative Resolution

Where concerns arise relating to a young person's access to age-rated games, the Provision will work collaboratively with parents, carers, commissioners to review the situation and agree appropriate support or adjustments.

5.5 Escalation

Where concerns indicate that a young person may be at risk of harm, the matter will be managed in accordance with the Provision's *Young Person Protection* Policy. The Designated Safeguarding Lead (DSL) or Deputy DSL will liaise with commissioners and relevant external agencies where appropriate.

6. SAFEGUARDING IMPLICATIONS

While the law does not prohibit underage use of age rated games, safeguarding practice requires vigilance:

- Exposure to certain content may affect behaviour, emotional regulation, or peer relationships.
- Any negative impact is treated as a safeguarding concern, not a compliance breach.
- The responsibility is shared: the Provision monitors daily, parents provide consent, and placing schools, where applicable contribute through agreed policies.
- Safeguarding implications are managed through observation, documentation, and collaborative problem solving.

Due to these restrictions, it is discouraged for young people to access content outside of their age rating.

Permission must be explicitly granted by parents and young people will not be able to access this content without explicit consent being given prior to accessing the content.

7. DISTINCTION BETWEEN LAW AND POLICY

6.1 Law

Restricts the sale and supply of age rated games.

6.2 School Policy

May restrict use or play but applies only within contractual agreements.

6.3 The Provision

Complies with the law, respects parental consent, and manages safeguarding implications through daily monitoring and collaborative resolution.

8. 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, and safeguarding practice, ensuring consistent application across the Provision.

APPENDIX 1 – USEFUL REFERENCES

1. Video Recordings Act 1984 – https://www.legislation.gov.uk/ukpga/1984/39/contents
2. BBFC Guidance for Teachers and Educators – https://www.bbfc.co.uk/teachers-and-educators/bbfc-teacher-faqs