



The Challenge Of Safeguarding in Esports White Paper

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About the Author

Mark Hatter has been a social worker since 1986. He has over 30 years' experience of working with child protection matters, in the capacity of Senior Social Worker, Child Protection Coordinator and Team Manager. He spent several years working alongside the police investigating organised sexual abuse, including Operation Ore that began in 1999.

In 2011 Mark became the director of Mark Hatter Associates Limited, which provides Health, Social Care and Education professionals working with children and their families an online resource, training, and an Independent Social Work Service. He is also an author, having published a children's book in 2012 written to help professionals talk to children about the care they are receiving from their parents and carers.

In 2019 Mark co-founded Akolyte Limited, a coaching platform for gamers who want to go professional. On the 1st July 2020 he and his co-founder will be launching the International Federation of Esports Coaching (IFEC) aimed at the professional development and education of esports coaches.

Underpinning all the above is Mark's belief that those who work with or offer any type of service to children and young people, must prioritise their safety and protect their best interests at all times.

Executive summary

1. Whilst this White Paper has been written for the Safeguarding, Games and Esports industries, it is also intended to be read by the parents of children and young people who are currently involved in gaming and/or esports. As such it does not assume that the reader is familiar with the issues that it seeks to address.
2. The esports industry is growing at a phenomenal rate and is estimated to currently be worth \$1.4 billion. As the world begins to adapt to the impact of the Covid-19 pandemic, live esports events and public gatherings have been cancelled. This means that in addition to the planned growth of the industry, more and more children and young people are turning to online activities for learning, leisure, and mental wellbeing. Both the number and amount of time children and young people are gaming will increase. Whilst safeguarding is paramount to the industry's success and reputation, as it is currently unregulated, there is currently very little evidence to demonstrate that it has put in place systems, or policies and procedures, to ensure that children and young people are safeguarded, both when they are online, or when they are engaging in live events and competitions, some of which will require international travel and overnight accommodation.

Our Response

3. This White Paper sets out a number of actions that we believe will make esports safer for children and young people. We believe that the esports industry has the opportunity to lead by example, and for it to recognise that the safeguarding of children and young people has to be its priority.
4. Esports is global and as such inter country government or state regulation is likely to be extremely hard to implement and monitor. Esports crosses all physical boundaries and it is hard to imagine how one country can expect another to implement or enforce another's regulations.
5. The esports industry can and should be supported to enable it to regulate itself.
6. The UK can lead the way in implementing an esports safeguarding system that other countries can then follow and contribute to.

Part 1 – Introduction

What do we mean by safeguarding?

7. The NSPCC defines Safeguarding as "*Safeguarding is the action that is taken to promote the welfare of children and protect them from harm*".

Safeguarding means:

- ❖ *Protecting children from abuse and maltreatment*
 - ❖ *Preventing harm to children's health or development*
 - ❖ *Ensuring children grow up with the provision of safe and effective care*
 - ❖ *Taking action to enable all children and young people to have the best outcomes.*
8. The Cambridge Dictionary defines esports as "*the activity of playing computer games against other people on the internet, often for money, and often watched by other people using the internet, sometimes at special organised events*".
 9. There continues to be a stereotype that the only people who play videogames are adolescent boys. Yet with the rise of smartphones, the gaming demographic has dramatically shifted. The truth is more than approximately 45% of the gaming audience is made up of females. Esports is popular with millennials, with the 21-35 age group representing 63% of the market. Females make up 31% of this audience and are most likely to watch when aged between 21-35. The average gamer is 35 years old with 30% of gamers being under the age of 18.
 10. There are no definitive statistics on the prevalence of gaming among adults on the autistic spectrum, but research has been found that 41.4% of children and young people who are on the autistic spectrum spend the majority of their free time playing video games versus 18% of children and young people in the general population. Whilst problematic gaming and excessive time spent playing games can result in health and behavioural difficulties such as sleep deprivation, lack of exercise and irritableness, video games are also viewed as a safe space by some people with autism, in addition to their entertainment value. Both the negative and positive need to be considered when we look at the use of video games by people on the autistic spectrum, or we risk making faulty judgements.
 11. Esports has always and will continue to attract the attention of children and young people. As the industry grows, opportunities for children and young people will of course increase. The current Covid-19 pandemic is also likely to accelerate the growth of the industry even

further. The number of 'grassroots' esports clubs is on the rise, with scouting for young players on the increase.

12. The involvement of more children and young people in esports is something to be celebrated and encouraged. Indeed, it is vital for the long-term health and stability of the esports industry. As the British Esports Association notes in a publication concerning a pilot initiative:

"By targeting children from a younger age, we are looking at the bigger long-term picture with the goal of creating more British esports champions and talent in the future. We can also present our findings to the Government to show them the value of esports in a bid to secure potential funding for grassroots esports in the future."

13. If it is to be considered successful however, the involvement of children and young people in esports needs to be subject to appropriate safeguards and risk management measures. The potential risk of harm to children is an everyday reality, and the importance of child protection issues in sport has recently been highlighted by high profile allegations of historic children and young people's sexual abuse in football – something which The FA's chairman described to the BBC as *"one of the biggest crises in the history of the Football Association"*.
14. In 2012 the worldwide esports market revenue was \$130 million, in 2019 it was \$1.1 billion and is projected to be worth \$1.6 billion by 2021. Forbes estimates a global audience of 443 million, a tripling since 2012. In 2019 prize money totalled \$173 million, with Fortnite having a prize fund of \$15.3 million and a first prize of \$3 million, bigger than the men's Wimbledon Tennis final of \$2.88 million. The number of professional esports players, more than tripled in the last 6 years, going from just under 8,000 in 2014, to over 25,000 in 2019.
15. Esports would not exist without the games industry. Popular games include Minecraft, FIFA Ultimate Team, Hearthstone, Fortnite, League of Legends, Rocket League, Magic the Gathering and DOTA.
16. Age ratings enable both children and young people and their parents to choose games which are age appropriate. All video games that are in a physical form i.e. boxed and sold in shops or through an online store come with a PEGI (Pan European Game Information) age rating. Game titles with PEGI ratings of 12, 16 or 18 years are legally enforceable, which can lead to retailers being prosecuted if they knowingly sell a game to someone who is underage.
17. However, there is no requirement for games distributed online to be age rated. However, some major platforms do voluntarily require game developers to have their online games rated using PEGI criteria through the IARC system (International Age Rating Coalition) using a questionnaire. However, the age ratings of games are not independently verified prior to the game being released.

18. There has been growing concern about children and young people making in-game purchases. Children and young people who play Fortnite can spend money on them improving their character which does not relate to gameplay. Getting particular attention is the games industry's use of Loot Boxes where a player can purchase a randomised selection of items. Given that there are elements of chance and no guarantee of reward there are calls from the Children's Commissioner for England, Anne Longfield OBE, that the same gambling rules that apply to adults should also apply to children. She noted that children and young people can feel pressurised to make such purchases to ensure that they keep up with their online peers.
19. Notwithstanding the Children's Commissioner's concerns, the online world that children and young people now inhabit will never be a place where they are completely protected from peer group pressure. Music, fashion and sport are popular interests for children and young people, it connects them, and all retail industries connected to them are there to make a profit. One only has to look at the prices of Premier League football shirts to see this in action. Back in the 1970's Top Trumps was the rage, with boys eagerly trying to outdo their friends. Boys were 'cool' dependent on the width of their flares and how many buttons were on the waistband. Many a child also spent some of their pocket money at the weekend on bags of randomly packed marbles hoping that during the Monday morning school break you were able to get more marbles than lose them, due to your pack having more coloured marbles within it than your friends had. Whilst fashions, music, games and technology may change, children will always want to fit in with their friends and peers. It is a natural part of child development and for the majority of children and young people leads to them being socially able and resilient.
20. Adolescence is a period of transition from childhood to adulthood. Fahlberg states that *"the primary psychological tasks of adolescence echo the tasks of years one to five. The young person must once again psychologically separate, this time from the family, finding their place in society as a whole, rather than solely as a member of a family. As they psychologically separate from the family, they are likely to oppose family rules, values, and expectations. While they are rebellious with adults, they seem to be overly compliant with peers. At the same time they have a strong need to belong in a family and to be taken seriously"* Taken from Fahlberg, V 'A Child's Journey through Placement' 2003.
21. The monetisation of children and young people, both online and in the physical world can be abused. Any retail targeting of children and young people needs to be done responsibly and ethically. The video games and esports industries are no exception to this rule and if Loot Boxes, for example, are seen as a significant concern these need to be addressed. Sustainable and long-lasting change is more likely when it comes from within.

22. As with football, children and young people who show potential to be a professional esports player can be signed by an esports team. As of 2020, the most famous esports teams include Team Liquid, Cloud9, NRG esports, American group FaZe Clan, SK Telecom T1, OpTic Gaming, and Evil Geniuses, which feature some of the greatest pro gamers of all time. Representing Europe, Asia, Australia, the US, South America, and more, the top esports teams are from all over the world. It is believed that the youngest child ever signed to an esports team was 11 years old.
23. Most of the highest ranking esports teams run residential facilities where their professional gamers, the majority males, who can be from any country, can come together to train for forthcoming live events. These facilities can house a mixture of young people and adults. Recent concerns have been expressed about young people not being supervised at night, poor living conditions, inadequate care being provided and alcohol misuse. Currently there are no regulations regarding the standards of care or supervision in these residential facilities.
24. The highest earnings by a player under the age of 18, is 'Bugha' with just over \$3 million. In the UK it is 'Wolfiez' with \$1.1 million. He is 16 years old.
25. Most esports competitions have a minimum entry age limit of 16 although some, for example have a minimum age of 13. However, in games like DOTA where the publisher does not control all of the tournaments the age restriction can be waived or changed depending on the tournament provider. For example, in some countries at live events you can compete under the age of 18 with a signed consent from a parent.
26. Whilst, positive opportunities exist, the internet can also expose children and young people to risks both from adult's whose sole intent is to cause them harm or from other children and young people.

Part 2 - The Problem

- ❖ The National Crime Agency has recently identified at least 300,000 people in the UK who pose a sexual threat to children and young people. Investigators have noted that paedophiles are currently discussing opportunities to abuse children and young people during the Covid-19 pandemic. It can be assumed that similar concerns will be identified in other parts of the world. Those intent on harming children and young people, either alone or with others, seek out organisations or activities where few protections are in place and the chance of getting caught is low. History has shown that paedophiles are very adept at embedding themselves into the very fabric of a sport.
- ❖ If parents' concerns about their children and young people being online are not addressed, the growth of esports, the benefits it can bring, and its credibility are at risk.
- ❖ The Disclosure and Barring Service (DBS) has a number of weaknesses within its current check criteria that unless addressed will leave children and young people who engage in esports vulnerable to abuse.
- ❖ Children and young people can pose a risk to other children and young people, whether this be through bullying behaviour, exploitation or sexually harmful behaviour.
- ❖ Done healthily, gaming and esports can bring great benefits to children and young people, particularly for those who may have specific learning needs or for those who may struggle in their peer to peer relationships. However, parents and carers are too often misinformed about the benefits of gaming and esports and as a consequence some children and young people may be missing out on opportunities.
- ❖ Children, young people and parents have a plethora of websites offering advice regarding online safety. However, there are currently none that purely focus on gaming or esports. Many websites that offer safeguarding advice are not children and young people friendly.
- ❖ Whilst more girls than ever before are gaming, the majority of gamers are boys. Boys represent the majority of professional gamers, with male only residential houses and campuses set up by some esports teams. It is widely recognised that males are known to be less likely than females to report abuse or of being the subject of grooming behaviour.
- ❖ The esports industry has not approached the safeguarding of children and young people as a global responsibility, leading to the potential of some countries being more vulnerable than others to child exploitation and abuse.

- ❖ There is a distinct lack of safeguarding expertise within the esports industry, leading to a lack of insight and a proactive response to what will be an increasing threat.
- ❖ Children and young people who take part in competitive esports have the potential to earn significant prize money and fame. For most children and young people and parents the sums of money involved could never have been imagined. As a consequence, without professional support and guidance financial exploitation can occur. Most children and young people are also ill equipped both emotionally and psychologically to deal with the consequences of becoming wealthy and having celebrity status.
- ❖ The esports industry is unregulated and is currently embarked on establishing its global identity. Competition between both esports companies, federations and countries will potentially lead to a lack of proactive joined up thinking with regard to safeguarding.
- ❖ Age verification is in its infancy and how effective it will be in ensuring that children and young people are not able to gain access to inappropriate games content requires ongoing review.
- ❖ Currently, apart from one UK based online coaching platform, no other platform currently undertakes suitability and criminal records checks on coaches who use their platforms.

Part 3: Facts

27. The opportunities the internet affords children and young people are immense. Here they can interact and communicate with their friends, support their education development, expand their horizons, satisfy their curiosity, follow music, fashion, sport and their favourite celebrities. They can find new interests, explore the world's history, debate politics and express their views, wishes, wants and opinions. Crucially for many children and young people also see the virtual world as an opportunity to inhabit a space where the adults around them struggle to monitor what they are doing or who they are communicating with.
28. From cognitive benefits to leadership and communication skills, providing jobs, meeting new people, being part of a community or even just sitting down to play and relax for a while as a hobby, esports and gaming can offer many positives and can offer some individuals, future benefits that would otherwise be unavailable to them.
29. The online world of gaming has amazing benefits and access to immediate feedback, but for children and young people, it is also important for them to learn how to keep safe whilst they are online
30. The Online Harms White Paper, April 2019 sought to address illegal and harmful online content. Its aim is ambitious *"the government wants the UK to be the safest place in the world, to go online, and the best place to start and grow a digital business"*. It acknowledged that illegal and unacceptable content and activity is widespread online, and UK users are frequently concerned about what they have seen or experienced. It notes *"the impact of harmful content and activity can be particularly damaging for children and young people, and there are growing concerns about the potential impact on their mental health and wellbeing"*.
31. The Online Harms White Paper has had a mixed response. Whilst majority safeguarding observers have welcomed its recommendations, some within the internet-based industry, have questioned whether they can legally be held responsible for content on their platforms that is not illegal. Others have questioned whether legal enforcement can be globally enforced. This push back against external regulation and legal enforcement from some internet providers continues to date.
32. The Disclosure and Barring Service (DBS) is responsible for deciding whether an individual should be barred from working with children and vulnerable adults and for maintaining a list of those individuals who are determined to be unsuitable (the barred list). The DBS is also responsible for processing requests for Criminal Records Checks, including those made as part of the checks carried out by particular organisations.

33. Those who wish to pursue a career as an esports coach can do so independently and without any oversight. When parents see that their child or young person has a talent which they wish to pursue, with the aim of becoming a professional gamer, parents can either elect to use a coaching platform or to search the internet for an independent coach. Currently there is no guarantee that what a coach may claim, including their own identity is true. Whilst many parents may complete their own due diligence, others may not, and may rely upon fictitious information given in order to deceive, or they may be pressured into using a particular coach by their child or young person.
34. Given that adults intent on harming children will exploit this vulnerability we strongly recommend that the government consider what sanctions can be put in place to prevent unregulated coaches gaining access to children and young people. There will need to be a review of the current DBS legislation which currently does not take into account self-employed coaches who operate alone, but who can still have considerable access to children. A basic DBS, which an individual can they themselves apply for, is not robust enough to prevent those adults who may be known as a concern to authorities, from targeting children and young people.
35. The gaming and esports industries are not immune to these online threats, which are further complicated when there is such a large crossover between the digital world, where the majority of gamers inhabit and the physical environment where many competitions take place. It is now not uncommon for topflight competitions to attract upwards of 20,000 attenders at live event finals. The professional gamers are now attracting the same status as Premier League footballers, with their own fan bases. Top-flight professional gamers can earn considerable sums of money with them travelling around the world to events with them staying in houses or training campuses, with other children and young people, where they hone their skills and receive coaching.
36. Institutional and organised sexual abuse is and will remain an ongoing serious threat to children and young people. One only needs to look through our own UK history to understand that no organisation is immune from abusive adults, whether this be professional football, the music industry, the care and education system or religion. Often, we have seen otherwise disconnected men come together to abuse children and young people as was seen in Rochdale. The child sexual exploitation of children (CSE) continues to be an ongoing concern for the public.
37. High profile sexual offenders such as Harvey Weinstein, Jeffrey Epstein and alleged child abuser Michael Jackson, demonstrate how such abuse can be prolific and remain undetected for many years. The sexual abuse committed by Jimmy Saville, spanned decades before it was finally exposed. There will be no doubt that in the future, and despite our best effort's further men and women of power, fame and/or influence will

come to notice, and more children and young people will be victimised.

38. When online safeguarding measures do not exist, are breached or break down, it can be catastrophic for both children and young people and their families. Too often the lessons learned from such cases are short lived, protections put in place are inadequate, and as times goes on become less important to key decision makers.

Case Studies

39. When **Gemma Watts** was 21 years old, she was jailed for eight years for posing as a teenage boy (Jake) to groom and sexually assault girls, some of whom were as young as 13. Some of Watts's victims were so traumatised by the abuse that they went on to self-harm or tried to kill themselves. Police believe that Watt's may have groomed as many as 50 teenagers.
40. Watts reached her victims by sharing skateboarding videos and flattering her victims with complementary messages, calling them "babe" or other pet names. When she met victims in person, she tied her long hair into a bun and wore a baseball cap, baggy jogging bottoms and a hoodie to convince the girls she was Jake. Watts was so convincing that she even spent lengthy spells as Jake with some of the girls' parents.
41. In her summing up, the judge said there was significant planning behind Watts's campaign and elements of her behaviour were predatory. All the girls she targeted were vulnerable and some had previously been bullied and had low self-esteem.
42. **Breck Bednar** and his friends were groomed by a man, Lewis Daynes, who ran an internet gaming server. They were told an elaborate web of lies to gain their trust. Despite many attempts to stop her son from contacting the predator, and to alert him to the fact that he was being groomed, Lorin LaFave was unable to prevent her son's murder in February 2014.
43. Breck had ignored the safety advice he had been given by friends and family and was lured to the predator's flat by fake promises and lies, where he was murdered.
44. As a result of the tragedy, Lorin founded the Breck Foundation, determined that no other family should have to go through the same ordeal. The charity now delivers powerful presentations using Breck's story as an example; last year it reached more than 20,000 students, 4,000 parents and 7,000 safeguarding professionals.
45. **Henrik**, a Norwegian soccer referee — was charged in 2018 with sexually abusing more than 300 boys in three countries beginning in 2011. Police found more than 16,000 explicit films of victims on the

suspect's computer. The 26-year-old man pretended to be a teenage girl to meet boys and young men on online chat forums.

46. Notwithstanding the advances made in identifying online abusers, it is a dangerous misconception to believe that any preventative measures put in place to prevent abuse will be 100% effective. The aim should always be to reduce the risk, respond to threats as they change, and to innovate. It is a case of being one step ahead as with other types of harm such as terrorism.
47. As has been seen elsewhere, it can be for some, an unpalatable thought that those who are seen as doing good for a sport and for children and young people, can also wish to exploit and abuse them. As has been seen elsewhere, unless proactively recognised by the esports industry as a whole, denial and disbelief can be a significant barrier to children and young people raising concerns. When this happens abuse will continue.
48. Many young people who are interested in gaming and esports can subscribe to a number of online platforms where they can play games, join groups, share their experiences, share video's and engage in all aspects of their interest. They can watch, share and comment on gameplay. Live tournaments and matches are shown and many esports professionals and Streamers use platforms to develop their own brand and build up followers.
49. Most online sites are based in the US, which has strict rules requiring providers to ensure that their platforms cannot be accessed by those under the age of 13, and that parental consent is required for young people up until the age of majority. However, more often, the expectation is placed onto young people that they will be truthful about their age. They themselves certify that a legal guardian has reviewed and agrees to the Terms of Service and an account is easily opened by providing a verifiable email, and the setting up of a password. The use of Age Verification software is limited.
50. Our research has shown that whilst most platform providers do provide strict expectations on users conduct and behaviour, it is not uncommon to see the following type of phrasing "*By using the Service, you acknowledge and accept that you may be exposed to material you find offensive or objectionable*".
51. In addition, whilst most platforms do have in place processes that will take down content that will cause harm, it is also not uncommon to see this following type of phrasing "*To the extent permitted by applicable law (our insert) takes no responsibility and assumes no liability for any User Content or for any loss or damage resulting therefrom, nor is (our insert) liable for any mistakes, defamation, slander, libel,*

omissions, falsehoods, obscenity, pornography, or profanity you may encounter when using the(our insert) services. Your (our insert) is at your own risk". This can be summarised very simply, many platform providers take no legal responsibility for any content that is uploaded, posted or otherwise made available to their subscribers.

52. We have found that users are able to advertise free esports coaching and set up groups for young people without any checks being completed.
53. Our research has shown that a grey market exists where user accounts and in-game items can be purchased in exchange for money which includes, but is not limited to, game rankings and sought-after items, for example skins and in-game currency. Whilst those who are found to do this will be removed from game platforms, it is relatively easy to buy numerous randomly generated email accounts which are then used to set up alternative user accounts.
54. Those looking to abuse children can buy these user accounts and online items, including game rankings, in order to draw children and young people into a group, or when targeting individual children. Theoretically, abusers would not need to have any direct game play experience, or competency, rather, relying on their ability to groom a children or young person.
55. Children and young people who game and take part in esports come from a wide range of ages, social class and educational backgrounds. Abuse thrives when vulnerable children and young people are not adequately protected or educated. This is particularly relevant to those children who are looked after by Local Authorities, whether they are placed in foster homes, children's homes, residential educational establishments or placed with family and friends.
56. Many of the 96,000 children who are in the care of Local Authorities in the UK are no exception to this. The capacity of foster carers to manage a foster child's online activity is variable. The average age of female foster carers is 46 whilst for male foster carers the average age is 54. Current trends predict these average ages are on the increase with Local Authorities and private fostering agencies struggling to recruit younger carers.
57. Whilst looked after children are generally more vulnerable, they should also be able to participate in those activities that other children and young people do. With non-looked after children and young people spending so much of their free time online, ways need to be found by Local Authorities that enables the children and young people they care for, to go online safely. Blanket bans on internet use imposed on some children and young people by foster carers, that is supported by an organisation or by individual social workers, is not only inappropriate,

but it fails to recognise that used safely the internet can have many social and educational advantages for looked after children.

58. The long-term outcomes for many children who have been in the care of the Local Authorities is poor, with many leaving school early or with few educational attainments, leading to fewer employment prospects and less opportunities to achieve financial independence for both themselves and their future families. Given that it has been well reported that 65% of current primary age school pupils will end up working in jobs that don't exist yet it is all the more important that children and young people who are in the care of Local Authorities are given the same educational opportunities as other children and young people.
59. The Association for UK Interactive Entertainment (Ukie) is a non-profit trade association for the video game industry. Ukie's Digital Schoolhouse, powered by PlayStation® programme, uses play-based learning to engage the next generation of pupils and teachers with the Computing curriculum. Digital Schoolhouse is funded by the UK games industry with sponsors including SEGA, Ubisoft and Warwickshire County Council and was originally seed funded by the Mayor of London's London Schools Excellence Fund (LSEF).
60. There is ample evidence to show that there are benefits for children and young people who game and participate in esports healthily. Within the Digital Schoolhouse paper "[Esports: Engaging Education](#)" they worked with Staffordshire University to develop a study that collected data using a number of methods, including questionnaires, case studies, discussion groups and informal feedback. The study focused on two key research questions:
- A. Does participating in esports create positive behavioural change in young players that will translate into behaviour modification in other aspects of their lives?**
- ❖ All transferable skills increased with Communication (74%) and Team Working (80%) coming top
 - ❖ 67% of respondents found that friendship bonds grew over the course of the tournament (and 94% of friendships were maintained or grew during the competition)
 - ❖ Over 80% said that the competition had increased their interest in participating in other team sports
- B. Does participating in esports influence the career path and STEM (science, technology, engineering, and mathematics) interests of young players?**
- ❖ Just under 90% said it had increased their interest in a career in the

video games industry

- ❖ Over 90% said it had increased their interest in computers and computing, but only 40% said it had increased their interest in studying it as a subject.
61. Where schools engaged in the DSH esports tournament teachers consistently reported the broader impact of the tournament on students. Reports included, increased student confidence, improved attendance to school, cross year group friendships and it engaged students who would have otherwise not engaged in extracurricular activities.
 62. In 2019 the charity 'Safe in Our World' was born. Their mission is to foster positive mental health wellbeing and deliver support not only for players but also developers, publishers, retailers and the others who make up the video games industry. Their goal is for the industry to come together and start a conversation that can change lives. They are committed to making a difference. Their hope is that Safe In Our World will grow into a default destination for gamers and developers grappling with mental health issues to where they can ask for help, access information and read about real people in the gaming space who have had their own struggles — and how they have dealt with them.
 63. Asked to comment about this White Paper, Safe in Our World stated *"We have a responsibility to gamers to protect them whilst playing and protect them in the environments that are created, whether that is a Fantasy world or a competitive arena. Guidelines and support need to be put in place to help facilitate this. Safe In Our World is working with a leading Mental Health charity to work on these guidelines and will be seeking the support of the global industry in implementing these. We also support the creation of the Safeguarding in Esports White Paper that Mark Hatter Associates will soon be publishing. We support their aims to make esports a safer place for children"*.

Part 4 – The Solutions

64. We recommend that the UK esports industry:
 - ❖ Sets up a safeguarding board that brings together expertise from both the esports, games and safeguarding industries.
 - ❖ Appoints a safeguarding commissioner who will take lead responsibility and oversight of policy and procedures, formulation, and implementation.
 - ❖ Dedicates some of its own expertise to ensure the continual innovation of safeguarding measures that address the ongoing threat of online

harms, ensuring that the esports industry will be a safe place for children and young people.

- ❖ Supports the aims of the International Federation of Esports Coaches, in promoting best practice, the upskilling and qualification of coaches and improvements in the gamers coaching experience.
- ❖ Supports the implementation of a register of vetted esports coaches that is accessible by parents and organisations.
- ❖ Puts in place internal regulation, codes of conduct and oversight, including inspection, of residential team accommodation where children and young people are resident.
- ❖ A clear and unambiguous policy on adult supervision, education and pastoral care of children and young people, including when DBS checks, and at what level are to be applied for.
- ❖ A widely publicised and accessible whistleblowing policy.
- ❖ Supports the development of a dedicated website for both parents and children and young people involved with esports, which provides them with user friendly safeguarding information and advice. The website should also provide information about how children and young people who game can take care of their own physical, mental health and wellbeing.
- ❖ Supports the development of an app that provides safeguarding information to parents, children and young people, coaches, and child welfare officers, that is free at the point of download.
- ❖ That there is a 'root and branch review' of how Local Authorities are currently enabling children and young people to safely access the digital world, both socially and educationally. We are particularly keen to see what can be done to encourage those children and young people who are currently out of education, or who attend special schools and pupil referral units to take advantage of alternative teaching and learning opportunities.
- ❖ We recommend that when Local Authorities are inspected by Ofsted, that the above is included during the process of inspection. We further recommend that children and young people's internet use and safety is embedded into Local Authorities looked after children's reviews.

Part 5 - Conclusion

65. The internet can be a powerful source of education, relaxation, and connectivity. It is this ability to link together people from all cultures,

ethnicities and backgrounds that gives today's children and young people opportunities never imagined by their ancestors. Today, children and young people can engage directly with others from across the globe. It's a far cry from when Alexander Bell won the first patent for the telephone in 1876.

66. Children and young people now navigate the internet with ease. Their knowledge base and ability to learn new technology outpaces most of their parents, many of whom struggle to make sense of their children's online lives. It is therefore not unsurprising that when they hear or read about, or see their children being the victims of harmful online behaviour, that many wish to discourage its use.
67. Online gaming and the subsequent rapid rise of the esports industry needs to carefully navigate between those that see gaming and esports as a positive, and those that believe it can be harmful and can exploit children and young people. The gaming and esports industries are first to acknowledge that problematic gaming and addictive behaviours needs to be reduced, and inside the industry there are significant efforts to ensure that children and young people game and participate in esports healthily.
68. Whilst the positives that the internet provide far outweigh the negative consequences of its use, the anonymity it can offer and the ability of some, who have intent to cause harm, to hide or change their identities remains a significant threat to children and young people. Since the Covid-19 crisis began, as more children and young people spend more time online so do the individuals who wish to abuse and exploit them. With the ultimate aim of never getting caught abusers will always seek out new opportunities, reinvent themselves and potentially join with others. As a new and developing industry esports is particularly vulnerable.
69. It is important to always remember that threats to children and young people do not just remain in the online world. Within esports the online space and the physical space frequently run side by side for children and young people who are, or who are seeking to be professional gamers. Attending tournaments and other events can take children and young people across the globe and some will stay in team houses or campuses. Without a robust safeguarding system being in place children and young people will remain vulnerable to abuse.
70. Within this White Paper we have outlined a number of actions that we believe will make esports a safer place for children and young people. Experience has shown that whilst no measures to safeguard children will ever be 100% effective, the more effort we make and the more working together we do, combined with using the technological resources we have at hand, the less likely it is that those intent on causing children and young people harm, will look towards esports as their opportunity to do so.

Appendix A – Definitions of child abuse

Definitions of child abuse

On their website the NSPCC provides a factsheet for professionals who work with children on how to recognise the signs of child abuse.

Physical abuse – happens when a child is deliberately hurt, causing injuries such as cuts, bruises, burns and broken bones. It can involve hitting, kicking, shaking, throwing, poisoning, burning, or suffocating.

It also includes physical abuse if a parent or carer makes up or causes the symptoms of illness in children. For example, they may give them medicine they do not need, making them unwell. This is known as fabricated or induced illness (FII).

Neglect - is persistently failing to meet a child's basic physical and/or psychological needs usually resulting in serious damage to their health and development. Neglect may involve a parent's or carer's failure to:

- ❖ provide adequate food, clothing, or shelter
- ❖ supervise a child (including leaving them with unsuitable carers) or keep them safe from harm or danger
- ❖ make sure the child receives appropriate health and/or dental care
- ❖ make sure the child receives a suitable education
- ❖ meet the child's basic emotional needs – parents may ignore their children when they are distressed or even when they are happy or excited. This is known as emotional neglect.

Sexual abuse - is forcing or enticing a child to take part in sexual activities. It does not necessarily involve violence and the child may not be aware that what is happening is abuse. Child sexual abuse can involve contact abuse and/or non-contact abuse. Contact abuse happens when the abuser makes physical contact with the child. It includes:

- ❖ sexual touching of any part of the body whether the child is wearing clothes or not
- ❖ rape or penetration by putting an object or body part inside a child's mouth, vagina, or anus
- ❖ forcing or encouraging a child to take part in sexual activity

- ❖ making a child take their clothes off, touch someone else's genitals or masturbate. Non-contact abuse involves non-touching activities. It can happen online or in person and includes:
- ❖ encouraging a child to watch or hear sexual acts
- ❖ not taking proper measures to prevent a child being exposed to sexual activities by others
- ❖ showing pornography to a child
- ❖ making, viewing, or distributing child abuse images
- ❖ allowing someone else to make, view or distribute child abuse images. Online sexual abuse includes:
- ❖ persuading or forcing a child to send or post sexually explicit images of themselves, this is sometimes referred to as sexting
- ❖ persuading or forcing a child to take part in sexual activities via a webcam or smartphone
- ❖ having sexual conversations with a child by text or online
- ❖ meeting a child following online sexual grooming with the intent of abusing them. Abusers may threaten to send sexually explicit images, video or copies of sexual conversations to the young person's friends and family unless they take part in other sexual activity. Images or videos may continue to be shared long after the abuse has stopped. Abusers will often try to build an emotional connection with a child in order to gain their trust for the purposes of sexual abuse. This is known as grooming.

Child sexual exploitation (CSE) is a type of sexual abuse. Young people in exploitative situations and relationships receive things such as gifts, money, drugs, alcohol, status, or affection in exchange for taking part in sexual activities. Young people may be tricked into believing they're in a loving, consensual relationship. They often trust their abuser and don't understand that they're being abused. They may depend on their abuser or be too scared to tell anyone what's happening. They might be invited to parties and given drugs and alcohol before being sexually exploited. They can also be groomed and exploited online. Some children and young people are trafficked into or within the UK for the purpose of sexual exploitation.

Sexual exploitation can also happen to young people in gangs (Berelowitz et al, 2013). Child sexual exploitation can involve violent,

humiliating and degrading sexual assaults and involve multiple perpetrators.

Harmful sexual behaviour - Children and young people who develop harmful sexual behaviour (HSB) harm themselves and others. HSB can include:

- ❖ using sexually explicit words and phrases
- ❖ inappropriate touching
- ❖ using sexual violence or threats
- ❖ full penetrative sex with other children or adults.

Sexual behaviour between children is also considered harmful if one of the children is much older – particularly if there is more than 2 years' difference in age or if one of the children is pre-pubescent and the other isn't (Davies, 2012). However, a younger child can abuse an older child, particularly if they have power over them – for example, if the older child is disabled (Rich, 2011).

Emotional abuse - is persistent and, over time, it severely damages a child's emotional health and development. It involves:

- ❖ humiliating, putting down or constantly criticising a child
- ❖ shouting at or threatening a child or calling them names
- ❖ mocking a child or making them perform degrading acts
- ❖ constantly blaming or scapegoating a child for things which are not their fault
- ❖ trying to control a child's life and not recognising their individuality
- ❖ not allowing them to have friends or develop socially
- ❖ pushing a child too hard or not recognising their limitations
- ❖ manipulating a child
- ❖ exposing a child to distressing events or interactions such as drug taking, heavy drinking or domestic abuse
- ❖ persistently ignoring them
- ❖ being cold and emotionally unavailable during interactions with a child

- ❖ never saying anything kind, positive or encouraging to a child and failing to praise their achievements and successes.

Bullying and cyberbullying - is behaviour that hurts someone else. It usually happens over a lengthy period of time and can harm a child both physically and emotionally. Bullying includes:

- ❖ verbal abuse, such as name calling
- ❖ non-verbal abuse, such as hand signs or glaring
- ❖ emotional abuse, such as threatening, intimidating, or humiliating someone
- ❖ exclusion, such as ignoring or isolating someone
- ❖ undermining, by constant criticism or spreading rumours
- ❖ controlling or manipulating someone
- ❖ racial, sexual, or homophobic bullying
- ❖ physical assaults, such as hitting and pushing
- ❖ making silent, hoax or abusive calls. Bullying can happen anywhere – at school, at home or online. When bullying happens online it can involve social networks, games, and mobile devices. Online bullying can also be known as cyberbullying.

Cyberbullying includes:

- ❖ sending threatening or abusive text messages
- ❖ creating and sharing embarrassing images or videos
- ❖ 'trolling' - sending menacing or upsetting messages on social networks, chat rooms or online games
- ❖ excluding children from online games, activities or friendship groups
- ❖ setting up hate sites or groups about a particular child
- ❖ encouraging young people to self-harm
- ❖ voting for or against someone in an abusive poll
- ❖ creating fake accounts, hijacking or stealing online identities to embarrass a young person or cause trouble using their name.