University of Minnesota-Safety of Minors (Subject to change, Fall 2020)

Virtual Guidelines: Hosting an Online Program/Activity for Minors

The following information has been gathered from resources made available by the American Camp Association (ACA)[1] and the Higher Education Protection Network (HEPNet)[2] and is intended to serve as a resource for University units and departments considering moving in-person programs/activities for minors online due to the COVID-19 health crisis.

Please note that programs/activities serving minors, including those held online, must adhere to the Safety of Minors Policy. The Policy includes specific requirements for program/activity approval, registration, staff and volunteer background checks, training, codes of conduct for staff and participants, record retention rules, and reporting requirements. Any suggestions provided here are in addition to, not in lieu of, requirements outlined in the Policy.

Recognizing that every program/activity is different, Administrators and Sponsoring Units must evaluate the nature of the program/activity and take appropriate actions to ensure the safety and security of all individuals involved.

If you have questions regarding the Policy or the best practices information provided herein, please contact:

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Timeline:
- For University-sponsored programs/activities, continue to coordinate with Human Resources for all staffing concerns, including consideration of timing required for hiring and background checks.

Technology Considerations:
- Pick a suitable online platform/service for your program/activity.
  - Coordinate with your unit's designated IT professional regarding safety/security.
  - Do not improvise with platforms or services that have not been reviewed and approved.
  - If program staff are required to use personal electronic equipment, work with IT to determine what security settings are preferred.
- Consider appropriate safety implementations, such as:
  - Requiring use of login credentials.
  - UMN supported platforms (Zoom, Flipgrid, Canvas, Microsoft Teams).
  - Limiting information that is shared with other participants, staff, or guests *e.g*., showing first name only, limiting audio and screensharing capabilities.
  - Controlling who has access to your programming by taking steps to eliminate presence of unregistered attendees and risk of "Zoom bombing."

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[1] https://www.acacamps.org/
[2] https://www.higheredprotection.org/

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- o Requiring the program/activity leader admit each participant individually or check attendees against registration lists.
  - o Taking reasonable steps to prevent and discourage participants from sharing meeting links.
- Determine how online records will be retained securely.
  - o Recommended 30 day max record retention, unless needed for a specific situation.
  - o Delete after 30 days.
  - o Records should be kept on a University accessible device, e.g. not on staff person's phone.
- Consider accessibility and disability accommodations in the online environment.
  - o *E.g.* can minors with sensory impairments participate? Do your videos include closed captioning? Do learners have a variety of options on how to interact?
  - o The Twin Cities campus Disability Resource Center and campus disability access offices, and/or Digital Education and Innovation are resources.
- Decide whether to record the program/activity.
  - o The best approach is to prohibit recording and adhere to the minimum two adult rule with all interactions. If the program/activity director determines recording is necessary, take reasonable steps to record the instruction only, limiting the inclusion of participants names, faces, or chat box comments.
  - o Prohibit kids/parents/guardians from recording, perhaps making an exception for a disability accommodation.
    - ▪ Understand the risks of participants taking screenshots or videos of the program/activity and consider how to structure the platform or service in a way to minimize this threat.
  - o If program staff may (or must) record, decide where the recording will be housed and how long it will be kept in accordance with record retention policies. Be transparent about the process and consider how to provide notice that the session is being recorded (audio only or audio + video).
  - o Ensure that all participants are aware of the recording, E.g. add a statement to the waiver that indicates online activity will be recorded and for what purposes such as quality control.

Program Leaders:
Define the oversight service roles of program leaders/managers in the online environment.
- How do they supervise program staff?
- Do they "sit in" on programs, perhaps at random, unannounced times?
- How do parents/guardians contact them?
- How can directors hold staff meetings, reinforce staff training, and hold discussions with individual staff?

Background Checks:
Background check requirements are still applicable to online programs/activities.
- For example, if you have a guest speaker or other individual who would not typically have direct contact with minors, that person might require a background check for online programs.

Participant Expectations for Virtual Programming (Similar to a Code of Conduct document):

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Review the Participant Expectations for Virtual Programming Document (staff, youth and families). Update to reflect any additional risks or concerns with the online setting, particularly regarding communications:

- Limit all communication to an official program platform, designated email, or telephone number.
- Remind Staff to maintain appropriate boundaries, reinforcing prohibitions on contacting youth outside of the program, the use of social media or other unofficial communications.
  - Keep discussions to curriculum or activity, no discussion of personal issues, sexual conversations, pornography, drugs, or alcohol.
  - If you have a need for staff to text youth, involve another adult, and consider blocking personal phone numbers.
- Make sure participating minors know:
  - To talk to a trusted adult if anything makes them feel uncomfortable.
  - That there should be no secrets between you and the person you're interacting with online.

Training:

Supplement staff training with specific advice about the online program/activity. Training must be tailored to your specific program/activity, but some online considerations include:

- Professional appearance and setting.
- Finding a secure and quiet environment for conducting programs/activities.
- Utilizing a secure internet connection.
- How to address technical problems and accessibility issues.
- Relevant online conduct rules for youth and themselves, as well as how to report concerns including bullying, discrimination/harassment.
- Planning for emergencies. *e.g.* What if a youth without a supervising adult disappears for an undue amount of time or perhaps has a medical emergency?

Communicating with Parents and Guardians:

- Gather emergency contact info for parents/guardians and make sure directors and staff have access.
- If their minors have participated in similar in-person programs/activities in the past, describe any changes they should anticipate in moving the program/activity online.
- Ensure that Parents/Guardians understand that all minors must be supervised during the program/activity. The required level of supervision will be program/activity dependent and should be determined by the Program Administrator in coordination with their Approving Official.
  - Preference for supervision is a parent/guardian/older sibling.
  - For older youth, determine in advance whether a parent/guardian/older sibling must be present with the minor OR if there will always be two program staff online during the program/activity.
- Communicate in advance what resources participants will need to participate.
  - Will the program/activity will be synchronous or asynchronous? Consider the availability of WIFI for synchronous activities, streaming videos, and downloading materials.
- Discuss how to report technical problems, raise concerns about staff or the program, report discrimination/harassment, and request disability accommodations. Make clear the days/hours

of the program and the prohibition, if you have one, of interaction outside the established times.
- Confirm the need for a Participation Agreement prior to the start of a program/activity.
- Review the Participant Expectations for Virtual Programming (like a Code of Conduct document).
- Notify Parents/Guardians of any policy on recording.

Partnering with an external organization or school:
- Ensure all parties are clear on virtual guidelines (see example of an external partnership agreement).
- Partner agencies, e.g., schools, will assume risk as it is their program-- as result teachers and partnering agency staff should always be present during the virtual interaction.

Additional Documents (located on the precollege network shared drive):
- Participant Expectations for Virtual Programming (Similar to a Code of Conduct Document)
- External Partnership Guidelines for Virtual Youth Programs (example), e.g., placing college students in a school to read with elementary students (virtually).

For additional information, the American Camp Association has COVID-19 camp resources, updated daily, here: https://www.acacamps.org/resource-library/coronavirus-information-camps

HEPNet, Higher Education Protection Network: https://www.higheredprotection.org/

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