

Boundary Violations Policy

SEASPAR is committed to implementing systems for monitoring and reporting behavior that violates physical, emotional and behavioral boundaries of minor and vulnerable adult participants and volunteers. The behaviors outlined in this policy are a non-exhaustive list of examples which, among others, may trigger intervention, corrective and/or disciplinary action and possible termination of employment or ending of a volunteer opportunity at SEASPAR.

Application

This policy applies to all employees and volunteers of SEASPAR. While this policy is intended to regulate the behavior of employees in SEASPAR programs as well as minor child- and vulnerable-adult volunteers of SEASPAR, the prohibited conduct can also serve as a guide regarding what is not a professional interaction with minor or vulnerable adult employees at SEASPAR. Nothing in this policy restricts SEASPAR's right to intervene as appropriate or enforce its other policies, including those on preventing discrimination, harassment or retaliation in the workplace.

Reporting Obligations

If an employee or volunteer of SEASPAR suspects a minor child under the age of 18 (a "minor") is being sexually abused or neglected, they must contact both the appropriate individuals within SEASPAR and report their concerns to the Illinois Department of Child and Family Services (DCFS) via the DCFS 24-hour reporting hotline 800.25.ABUSE. If an employee or volunteer believes a minor is in immediate danger of harm, they must first contact 911 and then report to the appropriate individuals within SEASPAR and DCFS.

If an employee or volunteer of SEASPAR suspects an adult with disabilities above the age of 18 (a "vulnerable adult") is being sexually abused or neglected, they must contact both the appropriate individuals within SEASPAR and report their concerns to the Illinois Adult Protective Services (IAPS) via the IAPS 24-hour reporting hotline: 866.800.1409. If an employee or volunteer believes a vulnerable adult is in immediate danger of harm, they must first contact 911 and then report to the appropriate individuals within SEASPAR and IAPS.

Employees and volunteers can find more information on mandated reporting in SEASPAR's Personnel Manual. However, this Boundary Violations Policy prohibits a broader range of conduct than applicable laws to help SEASPAR prevent sexual abuse and avoid the opportunity for or the appearance of employee/volunteer impropriety. If an employee or volunteer suspects an employee or volunteer of any of the boundary violations below – even if they do not have a reasonable belief that sexual abuse is actually happening – they still should report that conduct to the appropriate individuals within SEASPAR, so SEASPAR can investigate and take remedial action when warranted regarding the boundary violation.

The individuals within SEASPAR to report boundary violation-related concerns include the Safety Coordinator at 630.960.7623.

Prohibited Conduct

The conduct prohibited under this policy includes, but is not limited to:

Physical boundary violations (absent exigent circumstances).

- Shoulder, neck, feet or other types of massages, whether from adult to a minor/vulnerable adult or from a minor/vulnerable adult to adult).
- Wrestling or rough housing with a minor or vulnerable adult, including but not limited to piggyback rides, hands in the minor's or vulnerable adult's pockets or similar physical activities.
- Tickling or poking a minor or vulnerable adult.
- Placing a hand on a minor's or vulnerable adult's thigh or other intimate location of the body for any period of time.
- Placing a hand on any part of a minor's or vulnerable adult's body for an extended period unless part of the clearly defined job duties of the position (e.g., gymnastics or figure skating coach positioning an arm, etc.). Even when job duties involve necessary physical contact with minors or vulnerable adults, employees and volunteers must be mindful of trying to first use verbal coaching and then, only if still needed, keeping the touch professional, witnessed and to the minimum length needed to complete the task.
- Kissing, cuddling, lengthy hugs or holding a minor or vulnerable adult in an extended embrace or similar physical activities.
- Violence is intentionally directed toward a minor or vulnerable adult.
- Taking minors or vulnerable adults to remote areas 1:1 or engaging in other forms of seclusion (e.g., into an office away from others, in another room unwitnessed and/or with a closed door, vehicle rides not in compliance with SEASPAR protocols or policies, 1:1 in a bathroom stall, etc.).
- It is understood that individuals with special needs for disabilities may need the assistance of one-on-one aides and such assistance may involve certain physical interaction such as for bathroom assistance, feeding or other accommodations. However, please be sure other SEASPAR employees or volunteers are aware of the scope of the one-on-one aide's roles, responsibilities and location while working with participants one-on-one. Additionally, SEASPAR should maintain activities and staffing levels to eliminate altogether or minimize one-on-one activities, or so a second staff member or SEASPAR volunteer can still witness physical or behavioral care that may place the staff/volunteer and the participant in a vulnerable situation.

Emotional boundary violations

- Possessiveness of a particular minor or vulnerable adult, such as not allowing others to work with the minor or vulnerable adult and/or insisting on work tasks that involve or are with the minor or vulnerable adult.
- Private texting, calling or emailing with the minor/vulnerable adult outside of program protocols and policies. For more information, please see SEASPAR's *Electronic Communication with Minors and Vulnerable Adults Policy*.
- Flirting with minors or vulnerable adults (e.g., compliments or comments about physical appearance, asking about dating history or sex life, calling pet names, etc.).
- Disclosing private information to minors or vulnerable adults.
- Seeking to gain emotional support for oneself from a minor or vulnerable adult.
- Demanding minors or vulnerable adults reveal private information.
- One-on-one meetings and/or off-site meetings with minors or vulnerable adults.

Behavioral boundary violations

- Favoritism of one minor or vulnerable adult and/or being more lenient with that individual (e.g., giving gifts to one minor or vulnerable adult but not others, accepting gifts from a minor outside the context of group or program celebrations, etc.).

- Cursing in the presence of a minor or vulnerable adult or allowing them to curse.
- Sexually explicit conversations or humor with minors or vulnerable adults.
- Telling inappropriate jokes or making rude remarks to minors/vulnerable adults or in the presence of minors or vulnerable adults.
- Talking negatively and in a nonconstructive manner about matters of a minor's or vulnerable adult's life, their relationships, etc.
- Allowing or encouraging a minor or vulnerable adult to look at pornography and/or inappropriate materials (e.g., sexual- or adult-themed magazines, cards, videos, films, clothing, etc.).
- Allowing or encouraging a minor or vulnerable adult to drink alcohol, smoke cigarettes or use drugs, or doing so in front of a minor or vulnerable adult.
- Violating SEASPAR's *Electronic Communication with Minors and Vulnerable Adults Policy* or other policies of SEASPAR to prevent sexual abuse or the appearance of impropriety with minors or vulnerable adults.

Vehicle boundary violations

- Employees with **no** transportation duties for SEASPAR (i.e., non-drivers) and all volunteers of SEASPAR are prohibited from transporting participants, including but not limited to minors and vulnerable adults, as part of SEASPAR programs, whether in SEASPAR vehicles or personal vehicles.
- Employees **with** transportation duties of patrons for SEASPAR (i.e., drivers) should only use SEASPAR vehicles (not personal vehicles) to transport participants and must endeavor to have a second SEASPAR employee or volunteer in the vehicle when transporting minors or vulnerable adults at all times.
- Employees and volunteers of SEASPAR are strongly discouraged from giving rides to minor or vulnerable adult participants or volunteers outside of SEASPAR programs (such as in personal vehicles to/from SEASPAR programs) unless those minors or vulnerable adults are family members. If an employee or volunteer of SEASPAR does give rides to minor/vulnerable adult participants or volunteers outside of program, the parents/guardians of that minor or vulnerable adult need to give written permission to SEASPAR regarding the private transportation arrangement by using the Consent for Transportation form, signed by both parties.
- If parents/guardians give written permission to an Agency employee or volunteer to give personal rides to minors/vulnerable adults outside of SEASPAR programs, the ride should **not be 1:1** and/or the minor or vulnerable adult should be in the back seat and the driver in the front seat (with all required safety devices).
- Employees and volunteers of SEASPAR must also follow all rules, policies and procedures related to vehicles and transportation as outlined in the SEASPAR Driver's Manual.

Discipline

SEASPAR will evaluate each situation on a case-by-case basis, considering all factors for that unique situation. Violation of this Policy may lead to intervention, corrective action and/or discipline up to and including termination of employment or revocation of volunteering opportunities pursuant to SEASPAR's *Code of Conduct* or other applicable policies. The steps available may vary depending on whether the individual engaging in prohibited conduct is an employee or volunteer, and SEASPAR reserves the right to exercise its discretion within this and other applicable policies.