

Electronic Communication with Minors and Vulnerable Adults Policy

Purpose

SEASPAR commits to establishing and being a leader in preventive measures regarding issues surrounding the safety and well-being of minor and vulnerable adult participants in its programming, as well as minors and vulnerable adults who volunteer with SEASPAR. SEASPAR is aware that issues of unfettered electronic communication can lead to the opportunity for miscommunication, and that the perception of malfeasance can occur even in innocent situations. As a result, and for all involved, SEASPAR has instituted this policy regarding electronic communications with minor/vulnerable adult participants and volunteers.

Application

This policy applies to all employees and volunteers of SEASPAR. While this policy is intended to regulate the behavior of SEASPAR employees and volunteers toward minor children and vulnerable adult participants in SEASPAR programs, as well as toward minor child- and vulnerable-adult volunteers of SEASPAR, the prohibited conduct also serves 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.

Definitions

For the purposes of this policy:

- A "Minor Participant" is a registrant or participant in a SEASPAR program who is under the age of 18 years old.
- A "Minor Volunteer" is an unpaid volunteer for SEASPAR who is under the age of 18 years old.
- A "Vulnerable Adult" is a registrant or participant in, or an unpaid volunteer for, SEASPAR who is 18 years of age or older and who has a disability(ies).
- Collectively, Minor Participants and Minor Volunteers are referred to as "Minors."
- "Employees" refers to paid SEASPAR employees, whether in full-time, part-time or seasonal capacities.
- "Volunteers" refers to unpaid SEASPAR volunteers, such as volunteer coaches, parent volunteers and similar roles.
- "Electronic Communication" includes, but is not limited to, email, text messages, phone calls/voicemail, video conferencing, direct messaging, communications through applications, WhatsApp, Facebook, Instagram, Snapchat, Twitter, TeamSnap, TikTok, YouTube and all other social media platforms, unless otherwise noted.
- The term "Open and Transparent" means employees and volunteers must copy or include a parent/guardian of the Minor or Vulnerable Adult, another adult family member of the Minor or Vulnerable Adult or an adult member of SEASPAR's management team on all Electronic Communication with Minors or Vulnerable Adults.

Policy Requirements

- The requirements of this Policy apply to all electronic communications with a minor/vulnerable adult, whether initiated by an adult or a minor/vulnerable adult or not.



- All electronic communications between employees/volunteers and minors/vulnerable adults must relate solely to and be solely for the purpose of communicating information about SEASPAR activities.
- All electronic communications between employees/volunteers and minors/vulnerable adults sent as part of SEASPAR business constitute public records, and employees and volunteers must maintain them in a format and location so SEASPAR has timely access to the communications for the purposes of complying with IL FOIA, record retention laws and other applicable laws. No electronic communication may utilize any format that does not allow for the permanent retention of the full content of the electronic communication (e.g., WhatsApp, SnapChat, etc.).
- All electronic communications between employees/volunteers and minors/vulnerable adults must always be professional and respectful in nature and must refrain from unprofessional messaging, including, without limitation, sexual comments, name-calling, embarrassing the minor/vulnerable adult, harassment, bullying and similar conduct. For more information, please see SEASPAR's *Boundary Violations Policy*.
- All electronic communications to a sports team/program on which minors/vulnerable adults participate or from an employee/volunteer to a minor/vulnerable adult must copy or include at least one parent/guardian of the minor/vulnerable adult or member of SEASPAR's management team.
 - SEASPAR has provided an official form of electronic communication through ePACT in which authorized employees/volunteers may communicate with other employees, participants and parents/guardians for the purpose of SEASPAR, such as regarding upcoming activities, calendars of events, expectations, logistics, cancelations, and answering questions. Employees/volunteers should not communicate with minors/vulnerable adults using electronic communication outside of SEASPAR's official form of electronic communication.
- Employees/volunteers must save copies of communications with minors/vulnerable adults (and all SEASPAR business) for compliance with record-keeping obligations, among other reasons. If employees/volunteers need assistance in saving such records, please contact SEASPAR's Business Manager at 630.960.7622.
- To the fullest extent possible, the person approved to provide electronic communication on behalf of SEASPAR should use privacy settings to block private direct communication for nongroup discussion, such as private chat.
- No private channels (e.g., private Facebook groups or invite-only YouTube channels) are acceptable in helping to administer SEASPAR programs.
- Other than those assigned by SEASPAR, employees/volunteers should not utilize social media to communicate with minors or vulnerable adults. When SEASPAR assigns an employee/volunteer a duty that uses social media to communicate with minors or vulnerable adults, those assigned employees/volunteers can only use electronic platforms that allow open and transparent communication (e.g., no SnapChat, WhatsApp or similar platforms).
- If an employee/volunteer receives an electronic communication from a minor or vulnerable adult, they should proceed to include a parent/guardian, another adult family member of the minor/vulnerable adult or a member of SEASPAR's management team in compliance with the open and transparent concept. However, if the employee/volunteer determines from the electronic communication that an emergency exists, the employee/volunteer may respond directly to the minor/vulnerable adult for the limited purpose of addressing the emergency situation before immediately including the minor's parent/guardian, other adult family member(s) and/or SEASPAR management. Employees/volunteers should immediately report to a supervisor any emergency,

inappropriate communication and/or repeated efforts by a minor/vulnerable adult to communicate outside the scope of this policy.

- Employees/volunteers shall not take or post photographs of minors or vulnerable adults unless specifically assigned to do so as part of their duties by SEASPAR management. Even when assigned, such photographs and videos are for use only by SEASPAR and in no case shall employees/volunteers post such photos or videos on their personal texts, emails, social media or other personal electronic communications.
- Video conferencing platforms such as Skype, Zoom, GotoMeeting, Microsoft Teams, Google Meet, etc. are acceptable virtual learning platforms when live “in-person” programming/communication cannot take place.
 - Employees/volunteers must receive authorization from SEASPAR to lead such a session.
 - Parents/guardians must maintain any account for their minor/vulnerable adult.
 - Video conferencing/virtual learning activities must have SEASPAR preapproval.
 - Dates and times of video conferencing/virtual learning will be either (a) published and available to parents/guardians to attend and/or (b) available for SEASPAR management member to attend.
 - Authorized employees/volunteers hosting video conferencing should dress appropriately as they would for in an in-person session.
 - Private chatting during a session is prohibited; public chatting is encouraged.

Policy Exceptions

If one of the following exceptions exists with appropriate consent, SEASPAR does not require electronic communications to be open and transparent:

- Emergency – However, employees/volunteers must limit the communication to the least amount of information needed to tend to the emergency until they can reasonably reestablish open and transparent communication.
- Dual Relationship – The employee/volunteer has an existing relationship with the minor/vulnerable adult outside of the program, such as a familial relationship. However, even when a dual relationship exists, employees/volunteers must comply with SEASPAR’s expectation regarding open and transparent communications for all electronic communications sent on behalf of SEASPAR and must comply with SEASPAR’s *Boundary Violations Policy* at all times.
- Nonsubstantive Communication – It is not a violation of this policy for an employee/volunteer to “follow” a minor’s or vulnerable adult’s social media feed or to “like” a post.
 - However, employees/volunteers should be mindful of the perception of doing so, and SEASPAR encourages employees/volunteers to refrain from doing so.
 - Employees/volunteers should be mindful that nonsubstantive communications may violate other policies (e.g., “liking” photos of minors or vulnerable adults in swimsuits on the beach could be a violation of SEASPAR’s anti-harassment policy).
 - For purposes of this policy, posting to, sending a message within or similar communication with the minor/vulnerable adult through a minor’s/vulnerable adult’s social media feed constitutes substantive communication and is not excepted from this Policy.

Request to Discontinue Electronic Communication to a Minor or Vulnerable Adult

The parents or guardians of a minor or vulnerable adult may request in writing that their child/ward not be contacted by employees/volunteers through any form of electronic

communication or through only limited forms of electronic communication. In such instance, the parents/guardians should make the request in writing to: adminstaff@seaspar.org. Such a request should include contact information for the adult responsible for receiving any electronic communications for the program/volunteer opportunity on behalf of the minor/vulnerable adult.

Other

To ensure the efficient operation of SEASPAR, this policy does not apply to electronic communications between employees/volunteers and other SEASPAR employees who are under the age of 18 or vulnerable adults. However, SEASPAR expects employees/volunteers to use reasonable efforts to keep another member of SEASPAR management on electronic communications with minor employees (i.e., employees under the age of 18) and vulnerable adult employees, particularly when the communication is not to a group.