



MEMORANDUM

To: USG Institutional Leads for Programs Serving Non-Student Minors
From: Wesley Horne, Director of Ethics & Compliance
Date: June 1, 2020
Re: Best Practices for Virtual / Online Youth Programming

Background Information

The following information has been gathered from resources to include those 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 USG institutions that are hosting online youth programming for non-student minors.

Please note that programs/activities serving minors, including those held online, must adhere to each institution's policy regarding programs serving minors and the [USG's Implementing Procedures](#). Any recommendations provided here are in addition to, not in lieu of, USG policy requirements. Also, any camps or programs serving non-student minors must comply with the [Executive Orders](#) from Governor Kemp.

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.

Technology Considerations:

- Pick a suitable online platform/service for your program/activity.
 - Coordinate with your institution's designated Information Technology (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 your institution's IT Department to determine what security settings are preferred.
- Consider appropriate safety implementations, such as:
 - Requiring use of login credentials.
 - Branding the online platform.
 - 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."
 - Requiring the program/activity leader admit each participant individually or check attendees against registration lists.

¹ <https://www.acacamps.org/>

² <https://www.higheredprotection.org/>

- Taking reasonable steps to prevent and discourage participants from sharing meeting links.
- Determine how online records will be retained securely.
- Consider accessibility and disability accommodations in the online environment.
 - *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?
- Decide whether to record the program/activity.
 - The best approach is probably 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.
 - 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.
 - 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).

Program Directors:

Define the oversight service roles of program directors 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. However, you may need to reconsider who has "direct contact" with a minor. This list may be longer for an online program/activity than an in-person camp.

- 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 camps.
 - Ask: Would the individual have potential for one-on-one time (aka direct contact) with the minor or would they, as a result of their participation in the camp, have information sufficient to contact individual campers online outside of the approved online program/activity?

Code of Conduct:

Review the Code of Conduct for Program Staff and Students. Update to reflect any additional risks or concerns with the online setting, particularly in regard to 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 kids 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 be two program staff online at all times 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 Code of Conduct. Should include discussion of appropriate online behavior, security/data privacy awareness.
- Notify Parents/Guardians of any policy on recording.

- End -