



The Corporation of the Town of Tecumseh

Policy Manual

Policy Number: 103

Effective Date: July 29, 2019

Supersedes:

Approval:

Subject: Virtual Recreation Programming and Online Safety

1.0 Purpose

- 1.1 It is the policy of the Town of Tecumseh (Town) that the privacy and safety of participants engaging in online virtual recreation programming shall be considered the top priorities when developing and implementing online programs.
- 1.2 Online forums and gatherings provide an opportunity for the Parks & Recreation Services Department (Parks & Recreation) to connect with participants as an alternative to attending in-person.
- 1.3 The purpose of this policy is to establish a set of rules for online virtual recreation programming to ensure safety in an online environment, specifically:
 - Providing protocols and best practices to ensure safety and security of online programming.
 - Enforcing internet safety in regards to online virtual recreation programming.

2.0 Policy Scope

This policy applies to online virtual recreation programming developed and implemented by the Town under the authority of Parks & Recreation Management. The rules herein apply to:

- Parks & Recreation Management and Staff (Staff) who oversee, develop and implement online virtual recreation programming and who prepare, produce and promote online virtual programming through technological applications, including but not limited to:

- Video conferencing applications such as Zoom or Microsoft Teams
- YouTube videos
- Pre-recorded videos
- Live videos or streams
- All Youth and Adult Participants who use the Town's online virtual recreation programming.

3.0 Definitions

- 3.1 **Adult Participant** refers to an adult (age eighteen (18) or older) who is a participant in an online virtual recreation program hosted by the Town.
- 3.2 **Disqualifying / Disconnecting** refers to removing the access and participation of an individual from virtual online recreation program, as deemed necessary by the moderator.
- 3.3 **Inappropriate Behaviour** refers to conduct that is unwarranted and is reasonably interpreted to be demeaning or offensive.
- 3.4 **Instant Messaging** is an Internet communication service used to send and deliver messages and content immediately. (ex. private chat room)
- 3.5 **Internet** refers to the worldwide connection of networks which is linked through a common basis for communications for various applications.
- 3.6 **Moderator** – a Staff member who moderates an Internet forum or online discussion
- 3.7 **Online virtual recreation programming** refers to programs and activities operated by the Town in an online format. This includes programs operated on Zoom, Facebook or other platforms.
- 3.8 **Video-conferencing application / program** refers to an application or program which can be utilized as a video-chat for online virtual recreation programs.
- 3.9 **Youth Participant** refers to a youth under the age of eighteen (18) who is a participant in an online virtual recreation program hosted by the Town and requires adult consent for participation in such programming.

4.0 Roles and Responsibilities

- 4.1 The Town is committed to ensuring appropriate Internet safety while hosting and operating online virtual recreation programming within Parks & Recreation. This includes having safeguards in place for participant safety as well as securing personal information.
- 4.2 All Staff are required to:
- a) Undergo training on this policy and its relevant application to the satisfaction of Management;
 - b) Follow this policy in developing and implementing the Town's online virtual recreation programming. Staff found to be in violation of this policy, or engaging in inappropriate behavior, including but not limited to any of the following, may be subject to disciplinary action:
 - Contacting participants through personal accounts or after program hours;
 - Instant messaging participants in a private manner through video-conferencing platforms or in the operation of an online virtual recreation program;
 - Use of inappropriate language, actions or gestures;
 - Participating in inappropriate behavior or actions;
 - Disclosure of the personal information of participants;
 - Developing and implementing online virtual programming without Management authorization and under the auspices of the Town.
- 4.3 Parks & Recreation Managers/Supervisors (Management) responsible for overseeing online virtual recreation programming are required to:
- a) Supervise the development and implementation of online virtual recreation programming;
 - b) Train Staff on this policy prior to their commencement in the development and delivery of online virtual recreation programming;
 - c) Provide operational support to Staff in the development and delivery of online virtual recreation programming; and

- d) Monitor and evaluate the Town's online virtual recreation programming in accordance with Section 5.9 of this policy.

5.0 Procedures

- 5.1 The following procedures shall govern the use and safety of Staff and participants engaging in online virtual recreation programming.

5.2 Technology

- 5.2.1 Online virtual recreation programming shall be hosted using the Town's licensed and operated accounts only. No personal Staff accounts shall be used in the execution of the Town's online virtual recreation programming.
- 5.2.2 Town licensed and operated accounts shall be accessible to members of Management responsible for overseeing online virtual recreation programming.

5.3 Safety

- 5.3.1 An Informed Letter of Consent must be prepared and submitted to the parent or guardian at the time of registration. The Town must receive the completed Letter of Consent prior to allowing a Youth Participant to participate in online virtual recreation programs.
- 5.3.2 Staff administering the online program shall operate the video-conferencing program as a Moderator. This will allow Staff to close the program to unregistered participants, control access to the platform, and have the ability to mute, disqualify or disconnect any participant.

5.4 Registration

- 5.4.1 Participants must register for programs in advance through the Town utilizing one of the available options: Online, In Person, or Phone In.

5.5 Participants

- 5.5.1 The Town recognizes there are various age groups that virtual online recreation programming may attract. Rules apply to these age groups to create a safe experience.

5.5.2 Youth and Adult Participants

5.5.2.1. For online programming, the Town will:

- a) Maintain a minimum of two Staff hosting a video-conferencing program;
- b) Maintain a record of attendance of each registered participant;
- c) Disqualify / Disconnect participants and/or end the program session as deemed necessary by the Moderator;

5.6 Disqualifying / Disconnecting a User

5.6.1 While operating online virtual recreation programming, the situation may arise for the Moderator of a video-conferencing platform to disqualify or disconnect a user. The Town reserves the right to disqualify or disconnect any Participant who, at the determination of the Moderator, is in violation of this policy, as well as anyone who demonstrates inappropriate behavior including, but not limited to:

- a) Wearing inappropriate clothing;
- b) Using inappropriate, offensive, discriminatory or foul language;
- c) Displaying inappropriate, offensive, discriminatory or foul behaviour;
- d) Violating the Town's Violence and Harassment in the Workplace Policy (Policy #68) and/or Vandalism and Violence in Facilities Policy (Policy #53), including but not limited to these excerpts:
 - o Threats that involve any communication that could be reasonably interpreted as conveying intent to cause physical harm toward a person or toward other Corporate assets. This includes threats made through electronic means. Threats could be communicated through spoken or written words and through various types of electronic mediums. They could also involve the tone, volume and cadence of spoken words or the manner and style of written words; body language or the intrusion of personal space; and offensive visuals or sounds.
 - o Participation in recreational activities is an important element in the human development process. Tecumseh Recreation & Cultural Services operates facilities and programs which

encourage such participation, and is committed to ensuring the safety of patrons as well as staff.

- e) Spreading false or misleading communication which damages the reputation of another individual, organization or the Town;
- f) Expressions of hatred of a person or group of people that is likely to offend, insult, humiliate or intimidate;
- g) Infringement of copyright;
- h) Breaching the privacy of a participant inclusive of unauthorized disclosure of personal information;

5.7 Confidentiality

5.7.1 Personal information provided for the purpose of participating in online virtual programming is kept confidential by the Town in accordance with applicable law. In accordance with the *Municipal Freedom of Information and Protection Act*, personal information is collected under the authority of the *Municipal Act*, including but not limited to:

- Documentation and Letters of Consent collected by the Town's application process for online virtual recreation program participants; and
- Recordings of online virtual recreation programs.

5.7.2 Notwithstanding Section 5.6.1, the Town has a duty to report a child in need of protection pursuant to the *Ontario Child, Youth and Family Services Act, 2017, S.O. 2017, section 125(1)*. Should a Moderator believe circumstances warrant such a report, s/he will immediately report that circumstance to Management. Management shall make the final determination and, if warranted, undertake to report to the Children's Aid Society, as set out in the *Act*.

5.8 Training

- 5.8.1 Management assigned with responsibility for the Town's online virtual recreation programming shall design and deliver appropriate training for Staff engaged in its development and implementation.
- 5.8.2 Staff shall receive training on the Virtual Recreation Programming and Online Safety Policy at the time of hire and/or on commencement of an online virtual recreation program.

5.9 Monitoring & Evaluation

- 5.9.1 Management and Staff will monitor the implementation of this policy and the online virtual recreation program as well as any applicable regulatory changes that may affect the program.
- 5.9.2 The Virtual Recreation Programming and Online Safety Policy will be reviewed from time to time and updated as required by Parks & Recreation.