

Boys & Girls Clubs of Manatee County Policies and Procedures Operations

Date: 2018

Topic: Online Safety and Acceptable Usage Policy for Our Members

Policy:

The Boys & Girls Clubs of Manatee County will not permit any unauthorized access to sites that fall outside of the bounds of Children's Online Privacy Protection Act (COPPA) requirements. Should permission be granted by parent/legal guardian for a member to have access to a particular site that falls outside of the bounds of COPPA and contains content that is questionable, BGCMC reserves the right to block that Internet site until a complete investigation can be performed as to the design of its content.

Procedure:

BOYS & GIRLS CLUBS OF MANATEE COUNTY STANDARDS AND COPPA

Under the provisions of COPPA (Children's Online Privacy Protection Act) all commercial web sites must get prior consent before children 13 and under are permitted to share any personal information about themselves, or are permitted to use any interactive communication technologies where they would be able to share personal information with others. This includes chat rooms, e-mail, instant messaging, personal profiles, personal web sites, registration forms, and mailing lists. Although the school sites to which a member attends may be exempt and may provide these interactive forums for members while they attend school, BGCMC cannot allow members under 13 years of age to visit outside sites without parental consent. Both members in this age group and their staff members will be educated as to the provisions of the law and our policy.

BOYS & GIRLS CLUBS OF MANATEE COUNTY STANDARDS/COPPA AND PARENTS

COPPA requires expressed parental permission before any web site that can or is able to collect information via interactive components, allows children under the age of 13 to access their site. It must secure this permission regardless of whether information is collected. Simply having the ability to collect the information requires the parental permission for access. (Consent forms sent by parents/guardians via e-mail are not sufficient as parental permission unless there is a special reason or event).

The BGCMC is aware of the provisions of and educates its staff and effected members about their rights and responsibilities. Parents/guardians are advised that by signing the parental consent document form, they are granting permission for their child under the age of 13 to access such sites as part of the curricular activities provided by their school or specified school curricula hosted by BGCMC.

BOYS & GIRLS CLUBS OF MANATEE COUNTY STANDARDS AND/COPPA AND MEMBERS

Members under the age of 13 may not visit any web site capable of collecting personal information unless it is for curricular reasons and is under the direction or supervision of a teaching staff member of BGCMC. Members under the age of 13 visiting such sites without permission or direction will be in violation of this policy.

BOYS & GIRLS CLUBS OF MANATEE COUNTY STANDARDS AND ONLINE SAFETY AND PRIVACY

Members are reminded to follow safe Internet communications practices outlined below:

- **Never tell anyone personal information about yourself.**
- **Never meet anyone in person whom you have met online.**
- **Remember to never write any personal things about yourself in your online profile.**
- **Be civil and polite online.**
- **If people are conducting themselves poorly online, leave and report the conduct.**
- **Report any activity that makes you uncomfortable or if someone sends you inappropriate e-mail.**
- **Remember that you never really know who the other person is online.**
- **If you find an inappropriate web site, just click the back button and go somewhere else or exit the browser completely and start over.**

Internet Safety Plan Details

I. The Boys & Girls Clubs of Manatee County (BGCMC) is providing Internet access to its members while attending the Club. BGCMC's Internet system has a limited educational purpose. The BGCMC's Internet system has not been established as a public access service or an exclusive public forum. The BGCMC has the right to place restrictions on use to ensure that use of the system is in accordance with its limited educational purpose.

II. Users/Members use of the BGCMC's Internet system will be governed by this document, related BGCMC regulations, and the member disciplinary code. The due process rights of all users will be respected in the event that there is a suspicion of inappropriate use of the BGCMC Internet system. Because the law considers information and material on the BGCMC organization network as public documents and requires the monitoring of Internet activity, users should have limited privacy expectations regarding the contents of their personal files and records of their online activity while on the BGCMC system/network.

III. This document was developed in accordance with the statutory requirements of the Children's Internet Protection Act (CIPA) and the Children's Online Privacy Protection Act (COPPA).

- A. The BGCMC promotes the effective, educational use of the Internet in the Club through the establishment of a BGCMC and access to the BGCA web sites that provide access to prescreened, appropriate, educationally relevant material.
- B. Members of the BGCMC Internet system are educated regularly regarding the safe, ethical, legal, and responsible use of the Internet and of the BGCMC's Internet system and their rights and responsibilities under this plan.
- C. Member use and activities will be structured in a manner that is appropriate to the age and skills of members.

- D. The BGCMC protects against access to materials that are considered inappropriate for users to access through the BGCMC Internet system in the following manner:
1. The BGCMC recognizes that Internet resources can be categorized as prohibited, restricted, limited access, or approved material. Prohibited material may not be accessed by the members or staff at any time, for any purpose. Restricted material may be accessed by members in the context of specific learning activities that have been approved by a staff member for educational purposes. Limited access material is material that is generally considered to be non-educational or entertainment. Limited access material may be accessed in the context of specific learning activities that are directed by a staff member. Approved material, on the other hand, can be accessed at all times.
 2. The BGCMC has implemented the use of a technology protection measure (filtering software/hardware), which is a specific technology that will protect against access to visual depictions that are obscene, child pornography, and materials that are harmful to minors, as defined by CIPA. At the discretion of the BGCMC, the filtering software/hardware may also be configured to protect against access to other material considered inappropriate for member access. The BGCMC recognizes, however, that filters are not perfect. They block sites that should not be blocked and let through sites that should be blocked. Therefore, BGCMC **does not rely on filters as a sole protection measure**. Education on how to handle accidental access, supervision, parental support of policies and responsible use play important roles in responsible usage and monitoring control.
 3. Authorized staff may temporarily or permanently unblock access to sites containing appropriate material, if access to such sites has been inappropriately blocked by the filtering software.
 4. The determination of whether material is appropriate or inappropriate shall be based on the content of the material and the intended use of the material, not on the protection actions of the filtering software.
- E. Member use of the BGCMC Internet system will be supervised by staff in a manner that is appropriate to the age of the members and circumstances of use.
- F. The BGCMC has developed procedures to monitor member use of the Internet through an analysis of Internet usage records.
- G. The BGCMC will protect against the unauthorized disclosure, use, or dissemination of personal or confidential information of members in accordance with state, federal and local regulations.
- H. The BGCMC will regulate and address the disclosure of member information, posting member-created material, and posting pictures of members on the BGCMC web site (see membership application packet media parental consent form).

- I. Upon Application for Membership to the Boys & Girls Clubs of Manatee County, parents/guardians must sign an agreement to allow their child to access the Internet and Social Networking sites.
- J. The BGCMC educates members to respect intellectual property and observe copyright protection related to material that is accessed through or placed on the Internet.