

Bullying Prevention and Intervention Plan

Stetson School believes in providing an environment and culture in which all students can feel safe. This includes a commitment to provide an environment free from bullying and cyberbullying. This commitment is an integral part of our efforts to promote learning, and to prevent and eliminate all forms of bullying and other harmful behavior that can impede the learning process and progress in treatment.

Stetson understands that certain student groups may be more vulnerable to becoming targets of bullying, harassment, or teasing and we will take steps to ensure a safe, supportive environment for students, including these more vulnerable student populations. In addition, Stetson is committed to providing all students with the skills, knowledge, and strategies to prevent or respond to bullying, harassment, or teasing.

Stetson School provides constant supervision of all students to ensure that student actions and interactions are monitored, and staff intervene proactively when any behavior, including bullying, harassment, and teasing, jeopardizes the safe and secure environment we are committed to providing.

Stetson expects all staff to report possible cases of bullying and harassment and will not tolerate retaliation against students or staff that report such behavior. Stetson School will investigate all reports and complaints of bullying, cyberbullying, or retaliation, and take prompt action to end that behavior and restore the targeted student's sense of safety.

This Bullying Prevention and Intervention Plan is a comprehensive approach to address bullying and cyberbullying. The plan applies to both students and members of the school staff, including, but not limited to, direct care staff, support staff, custodial staff, kitchen staff, maintenance, teachers, clinicians, case managers, supervisors, nurses, and administrators. The Program Director is responsible for the implementation and oversight of the plan, except when a reported bullying incident involves the Program Director as the alleged aggressor. In such cases, the Vice President, or its designee, shall be responsible for investigating the report, as well as other steps necessary to implement the plan, including the safety of the alleged victims. If the Vice President is the alleged aggressor, the Senior Vice President and/or the Vice President of Human Resources for Seven Hills shall be responsible for investigating the report, as well as other steps necessary to implement the plan, including the safety of the alleged victims.

Prohibition Against Bullying and Retaliation

Stetson School prohibits all acts of bullying, including cyberbullying:

- i. Anywhere on Stetson School's campus or property or immediately adjacent to school grounds, at any Stetson sponsored activity whether on or off campus, in any Stetson School vehicles, or through the use of technology or an electronic device owned by Stetson School, and
- ii. At a location away from Stetson's campus through the use of technology or an electronic device that is not owned by Stetson School, if the acts create a hostile environment at school for the targeted student or witnesses, infringe on their rights at Stetson, or materially and substantially disrupt the education or treatment process or the orderly operation of the school.

Retaliation against a person who reports bullying, provides information during an investigation of bullying, or witnesses or has reliable information about bullying is also prohibited.

Staff Training and Professional Development

Annual Staff Training: Stetson provides annual training for all Stetson staff on the Bullying Prevention and Intervention Plan and includes staff duties under the plan, an overview of the steps administration will follow upon receipt of a report of bullying or retaliation, and an overview of the bullying prevention curricula offered to all grades at Stetson School. This training is also included in the In-Service Orientation provided to all new employees of Stetson. Stetson utilizes Bridgewater State's MARC Train the Trainer model for our trainings and professional development.

Ongoing Professional Development: Our goal is to establish a common understanding of tools necessary for staff to create a school climate that promotes safety, civil communication, and respect for differences. Professional Development builds the skills of staff members to prevent, identify, and respond to bullying. As required by MGL c. 71, § 370, the content of the campus wide professional development is informed by research and includes information on:

- i. Developmentally and age-appropriate strategies to prevent bullying;
- ii. Developmentally and age-appropriate strategies for immediate, effective interventions to stop bullying incidents;
- iii. Information regarding the complex interaction and power differential that can take place between and among an aggressor, targeted student, and witnesses to bullying;
- iv. Research findings on bullying, including information about specific categories of students who have been shown to be particularly at risk for bullying in the school environment;
- v. Information on the incidence and nature of cyberbullying; and
- vi. Internet safety issues as they relate to cyberbullying.

Professional development also addresses ways to prevent and respond to bullying or retaliation for students with disabilities that must be considered when developing students' Individual Education Programs (IEP's). This includes a particular focus on the needs of students with Autism or students whose disability affects social skills development.

Other areas of professional development that Stetson provides on an on-going basis include:

- i. Promoting and modeling the use of respectful language;
- ii. Fostering an understanding of and respect for diversity and difference;
- iii. Building relationships and communicating with families;
- iv. Constructively managing behaviors;
- v. Using positive behavioral intervention strategies;
- vi. Applying constructive disciplinary practices;
- vii. Teaching students skills including positive communication, anger management, and empathy for others;
- viii. Engaging students in school, classroom, or milieu decision-making;
- ix. Maintaining a safe and caring environment for all students.

All professional development is provided by trained individuals with the educational and/or clinical background necessary to ensure staff are given the tools necessary to prevent and respond to bullying and harassment.

Written Notice to Staff: Stetson School provides all staff with an annual written notice of the plan and publishes information about it, including sections related to staff duties, as well as the prohibition of bullying students by staff, in the employee handbook.

Student Training and Instruction (Academic and Non-Academic Activities)

Stetson School is a 766 approved private non-profit residential special education school for male youths aged 9-22, with cognitive capacities ranging from a full score IQ of 55 and up. Stetson School does not have any day students and all students live at the school full time. Students at Stetson School have a history of sexually troubling behaviors and/or other behavior disorders. Due to the nature of the students that attend Stetson School, every effort is made to ensure we provide a safe and therapeutic environment for all students. All student conversations and interactions are monitored by staff to ensure respectful communication between students. When inappropriate and/or disrespectful interactions occur, students are addressed immediately and staff take the opportunity to teach and practice pro-social skills. Students are also not allowed on the Internet without direct staff supervision. In addition, Stetson School also provides a number of academic and non-academic activities and programs to prevent bullying and harassment.

Upon admission to Stetson School, students are given information about the student-related sections of the Bullying Prevention and Intervention Plan during the admissions and intake process. This information is also provided in the student handbook which is given to all students upon admission. It is then explained in more detail by the student's individual residential advocate.

Since many of our students do not have the social competencies needed to navigate a confusing social world, all students at Stetson School are required to take a Social Development class each year. There are various levels of the course to ensure age and developmentally appropriate instruction is given. This course focuses on the development of social skills, engaging in healthy relationships and respectful communication, understanding and respecting difference, dynamics of bullying and cyberbullying, and how to respond to bullying and cyberbullying whether the victim or witness. The bullying prevention curriculum utilized in the Social Development class, *Bully Proofing Your School*, among other things, emphasizes the following approaches:

- Using scripts and role plays to develop skills;
- Empowering students to take action by knowing what to do when they witness other students or school staff engage in acts of bullying, harassment, or retaliation, including seeking adult assistance;
- Helping students understand the dynamics of bullying and cyberbullying, including the underlying power imbalance;
- Emphasizing cybersafety, including safe and appropriate use of electronic communication technologies;
- Enhancing students' skills for engaging in healthy relationships and respectful communications; and
- Engaging students in a safe, supportive school environment that is respectful of diversity and difference.

Bully Proofing our School, the evidence based curriculum utilized at Stetson School, provides instruction at the various different age, grade, and developmental levels. The curriculum is published and distributed by Sopris West Educational Services and is recommended by the United States Department of Education. More information about the curriculum, including copies of sample curriculum units, can be obtained by contacting the Education Director.

Stetson School's residential program also offers a number of ways of teaching pro-social skills. Students enhance their social skills and abilities to relate and self regulate through specific skills groups and structured therapeutic recreation. The skills group offerings are a major forum for developing pro-social competencies in students. The evidenced based curriculum and content of these groups may differ for specific populations that are served to ensure they are developmentally and age appropriate. Topics may include, but are not limited to, aggression control, anger management, moral reasoning, stress management and coping, and conflict management. Stetson School also views the recreational programming as an important therapeutic venue as children often learn to relate and regulate themselves through play. Each

residential team provides a rich, varied, and age appropriate schedule of activities, which rotates after specified periods of time. In addition, students participate in weekly recreation therapy also focused on teaching students pro-social skills.

Although student interactions and time on the Internet is closely monitored, an emphasis is still made on cybersafety, bullying, and what to do as a bystander to assist in the preparation of their discharge to a lower level of care.

Collaboration with Families

Although Stetson School is a residential facility, we believe that involvement of and collaboration with families is very important. Because families play an important role in the education of their child, Stetson School provides opportunities for parents to be educated about bullying, as well as online safety and cyberbullying. Specifically, in collaboration with Stetson's Parent Advisory Group, Stetson offers educational programs surrounding the anti-bullying curriculum, how parents can support anti-bullying efforts, and recent research and trends in bullying and cyber-bullying. Because so many of our families are not always able to attend in person, they have the ability to participate in these educational sessions via conference phone.

Each year, Stetson informs parents of the student-related section of the Plan, anti-bullying curricula being used, and how they can participate in educational sessions about bullying and cyber-bullying. All notices and information are available to parents or guardians in the language(s) most prevalent among parents and guardians. Stetson also posts this plan and related information on its website.

Policies and Procedures for Reporting and Responding to Bullying and Retaliation

Stetson School has put into place policies and procedures for receiving and responding to reports of bullying and retaliation to ensure that all members of the Stetson community know what will happen when incidents of bullying occur. Annually, Stetson provides all members of the Stetson community written notice of its policies and procedures for reporting acts of bullying and prevention. Stetson School is a year round program with rolling admissions, therefore written notice of Stetson's policies and procedures is provided to both students and parents or guardians during the admissions and intake process. This information is also provided in the student, parent, and employee handbooks.

Reporting Bullying or Retaliation. Reports of bullying or retaliation may be made by staff, students, parents or guardians, or others. Staff making reports of bullying must do so in writing. All others, including students, parents or guardians, and others who are not Stetson staff members may make their report either orally or in writing and may do so anonymously if they wish.

Reporting by Staff: Staff who are witnesses or become aware of potential cases of bullying, cyberbullying, or retaliation must report that information to their supervisor immediately. The supervisor will in turn immediately notify their direct administrator, the Program Director, and the on-call administrator if necessary. The staff also must document their report in writing on a *Staff Incident Report*. Although the staff must document incidents of bullying or cyberbullying, they still are required to respond to behavioral incidents consistent with Stetson School's Behavior Management Guidelines. If the aggressor is a member of the administration and/or the Program Director, staff must report the potential cases of bullying to the Vice-President. If the aggressor is the Vice President, staff must report the cases of bullying to the Senior Vice President and/or the Vice President of Human Resources for Seven Hills.

Reporting by Students, Parents or Guardians, and Others: Students and parents or guardians can report acts of bullying and/or retaliation in a number of ways. Parents and guardians may make reports directly to the student's case manager, clinician, unit director, Education Director, or Program Director. In addition, if the aggressor is the Program Director or Vice President of Stetson School, reports can be made to the Senior Vice President and/or the Vice President of Human Resources for Seven Hills. Students can report potential acts of bullying to any Stetson School staff member. Oral reports made to a staff person must be put into writing by the staff member. In addition, students and parents or guardians may make a written report using Stetson School's Complaint Form which is given to all students, parents, and guardians upon admission. Complaint forms can also be requested from the student's case manager or downloaded from Stetson School's website. Use of the Complaint Form is not required as a condition of making a report. Reports may also be made anonymously. Since students are not allowed to use the campus phones and are constantly monitored, they may make an anonymous report by writing their complaint/report on any piece of paper and then submitting it in the student suggestion box. Parents and guardians may make an anonymous report by leaving a message on a dedicated voice mail box by dialing extension 467 when calling the main number to the school. Although reports may be made anonymously by students, parents, or guardians, no disciplinary action will be taken against an alleged aggressor solely on the basis of an anonymous report. Students, parents or guardians, and others may request assistance from a staff member to complete a written report.

Responding to Reports of Bullying and Retaliation. Stetson responds to all reports of bullying and retaliation in a timely manner and without prejudice or bias.

Safety: Before investigating the allegations of bullying or retaliation, the Program Director, on-call administrator, or designee will immediately take steps to assess the need to restore a sense of safety to the alleged targeted student and/or protect the alleged targeted student from possible further incidents. In addition, the Program Director will take steps to protect others who witnessed or provided information about the alleged bullying. Responses to promote safety are consistent with safety programming used at Stetson School and include, but are not limited to, creating a personal safety plan, changing seating arrangements of students in a classroom or at meals, changing classroom assignments of students, changing unit assignments, utilization of one of Stetson's special programs, or altering the aggressor's schedule and access to the targeted student. In addition, the Program Director, the student's clinician, and/or other appropriate individuals will check in with the targeted student, witnesses, or other students providing reliable information to ensure that safety of those students is maintained. The Program Director or designee will take additional steps to promote safety during the course of, and after, the investigation, as necessary.

Investigation: The Program Director or designee will investigate promptly all reports of bullying or retaliation and, in doing so, will consider all available information known, including the nature of the allegation(s) and the ages of the students. The Program Director or designee will, among other things, interview students, staff, witnesses, parent or guardians, and others as necessary. Although the person conducting the investigation will keep information about who has reported the alleged bullying or provided information during the investigation confidential, he or she will also remind the alleged aggressor, targeted student, and witness(es) that retaliation is strictly prohibited and could result in disciplinary action. Procedures for investigating reports of bullying and retaliation will be consistent with Stetson School policies and procedures for internal investigations. A written record of the investigation, including interview notes and findings, will be maintained by the Program Director.

Determinations: The Program Director or designee will make a determination if bullying or retaliation occurred based upon all the facts and circumstances. If, after investigating, bullying or retaliation is substantiated, the Program Director or designee will take steps reasonably calculated to prevent recurrence and to ensure that the targeted student is not restricted in participating in school or treatment. The Program Director or designee will determine what remedial action is required, if any, and determine what disciplinary actions are necessary.

Notifications: The Program Director or designee will promptly notify the parents or guardians of the targeted student and the student aggressor about the results of the investigation and, if bullying or retaliation is found, what actions are being taken to prevent further acts of bullying or retaliation. All notices to parents will and must comply with privacy laws and regulations. Because of the legal requirements regarding the confidentiality of student records, the Program Director or designee cannot report specific information to the targeted student's parent or guardian about the disciplinary action taken.

If the reported incident involves students from outside of Stetson School, the Program Director or designee will promptly notify by telephone or e-mail the principal or designee of the other school(s) of the incident so that each school may take appropriate action. All communication will be in accordance with privacy laws and regulations.

Notice to Law Enforcement: At any point after receiving a report of bullying or retaliation, including after an investigation, if the Program Director or designee has a reasonable basis to believe that criminal charges could be pursued against the student aggressor, the Program Director will notify the Barre Police Department and other applicable authorities as necessary.

False Allegations: If the Program Director or designee determines that a student knowingly made a false allegation of bullying or retaliation, that student may be subject to disciplinary action consistent with Stetson's Behavior Management Guidelines.

Alleged Bullying by the Program Director or Vice President of Stetson School: The Program Director is responsible for the implementation and oversight of the plan, except when a reported bullying incident involves the Program Director as the alleged aggressor. In such cases, the Vice President, or it's designee, shall be responsible for investigating the report, as well as other steps necessary to implement the plan, including the safety of the alleged victims. If the Vice President is the alleged aggressor, the Senior Vice President and/or the Vice President of Human Resources for Seven Hills shall be responsible for investigating the report, as well as other steps necessary to implement the plan, including the safety of the alleged victims.

Responses to Bullying

Stetson will take steps and use various strategies in the prevention of further bullying. These steps and strategies may include offering individualized skill-building sessions based on the Stetson's anti-bullying curricula, providing relevant activities for individual students or groups of students that support Stetson's anti-bullying curricula, implementing positive behavioral supports to help students understand pro-social ways to achieve their goals, and adopting behavioral plans to include a focus on developing specific social skills.

Disciplinary Action: The Program Director or designee may determine that specific consequences consistent with Stetson School's Behavior Management System are needed for the aggressor. This may include, but is not limited to, processing, rehearsal, restitution, suspension, and being discharged from Stetson School.

Promoting Continued Safety for the Targeted Student and Others: The Program Manager or designee will consider what adjustments, if any, are needed to enhance a sense of safety for the targeted student and others. In addition, the Program Director or designee will contact the targeted student, as well as students who witnessed or provided information regarding the bullying, within a reasonable period of time following the investigation to determine if additional supportive measures are needed. In addition, the student's clinician will check in with all students involved, including the targeted student, on a weekly basis to ensure the student feels safe. If additional supportive measures are needed, those measures will be implemented immediately.

Access to Resources and Services

Given that Stetson School is a treatment facility, ample clinical resources are available to ensure the emotional needs of the targeted students, student aggressors, families, and others are addressed. All students at Stetson currently meet with their clinician for individual therapy at least once a week, receive group therapy two times a week, and receive family therapy when appropriate. If it is determined that additional time is needed to address the unique emotional needs associated with bullying, Stetson will ensure the student is able to receive that support. In addition, the student's clinician is a member of the treatment team and would be involved in the development of needed behavioral support plans and/or safety plans. If it is determined that the student needs additional support that Stetson cannot adequately provide, a referral for external crisis screening and/or psychiatric support and services will be made. In addition, if family members of the involved students need additional support, Stetson will work with the family and/or DCF or other referral agency to locate needed services in that family's community.

Students with Disabilities

As required by MGL c. 71, § 370, as amended by Chapter 92 of the Acts of 2010, when the IEP Team determines the student has a disability that affects social skills development or the student may participate in or is vulnerable to bullying, harassment, or teasing because of his disability, the Team will consider what should be included in the IEP to develop the student's skills and proficiencies to avoid and respond to bullying, harassment, or teasing.

Relationship to Other Laws

Consistent with state and federal laws, and the policies of Stetson School, no person shall be discriminated against on account of race, color, sex, religion, national origin, or sexual orientation. Nothing in the plan prevents Stetson School from taking action to remediate discrimination or harassment based on a person's membership in a legally protected category under local, state, or federal law, or Stetson School policies.

In addition, nothing in the plan is designed or intended to limit the authority of Stetson School to take disciplinary action or other action under M.G.L. c. 71, sections 37H or 37H½, other applicable laws, or Stetson School policies in response to violent, harmful, or disruptive behavior, regardless of whether the Plan covers the behavior.

Definitions

Aggressor: Student or member of the school staff who engages in bullying, cyberbullying, or retaliation toward a student.

Bullying: As defined in MGL c. 71, § 370, is the repeated use by one or more students or member of the school staff of a written, verbal, or electronic expression or a physical act or gesture or any combination thereof, directed at a target that:

- i. causes physical or emotional harm to the target or damage to the target's property;
- ii. places the target in reasonable fear of harm to himself or of damage to his property;
- iii. creates a hostile environment at school for the target;
- iv. infringes on the rights of the target at schools; or
- v. materially and substantially disrupts the education process or the orderly operation of a school.

Cyberbullying: bullying through the use of technology or electronic devices such as telephones, cell phone, computers, and the Internet. It includes, but is not limited to email, instant messages, text messages, and Internet postings.

Hostile Environment: as defined in MGL c. 71, § 370, is a situation in which bullying causes the school environment to be permeated with intimidation, ridicule, or insult that is sufficiently severe or pervasive to alter the conditions of a student's education.

Retaliation: any form of intimidation, reprisal, or harassment directed against a student who reports bullying, provides information during an investigation of bullying, or witnesses or has reliable information about bullying.

Staff: all Stetson School employee's including, but not limited to, direct care staff, support staff, custodial staff, kitchen staff, maintenance, teachers and educators, bus drivers, athletic coaches, advisors to extracurricular activities, clinicians, case managers, supervisors, nurses, and administrators.

Targeted Student: a student against whom bullying, cyberbullying, or retaliation has been perpetrated.