JUSTICE RESOURCE INSTITUTE
Day School Division

BULLYING PREVENTION AND INTERVENTION PLAN

PURPOSE:

The JRI Day Schools (Schools) strive to maintain a safe school community where diversity and difference is respected, and where successes and strengths are celebrated. The Schools are committed to providing all students with a safe learning environment that is free from bullying, cyber bullying, and retaliation following reports of bullying. This commitment is an integral part of our comprehensive efforts to promote learning, and to prevent and eliminate all forms of bullying and other harmful and disruptive behavior (including harassment and hazing) that can impede the learning process. The Schools expect that all members of the school community will treat each other with respect. This plan and protocol applies to students and members of the staff, including but not limited to, educators, administrators, clinicians, classroom and milieu counselors, case managers, vocational staff, school nurses, cafeteria and custodial workers, bus drivers, athletic coaches, advisors to an extracurricular activity, and paraprofessionals

We understand that certain students may be more vulnerable to becoming a target of bullying or harassment based on actual or perceived differentiating characteristics, including race, religion, ancestry, color, national origin, sex, socioeconomic status, homelessness, academic status, gender identity or expression, physical appearance, sexual orientation, mental, physical, developmental, or sensory disability, pregnancy or parenting status, or by association with a student who had or is perceived to have one of more of these characteristics. The Schools will take specific steps to create a safe, supportive environment for vulnerable populations in the school community, and provide all students with the skills, knowledge, and strategies to prevent or respond to bullying, harassment, teasing or meanness.

The Schools prohibit unlawful or disruptive behavior, including any form of bullying, cyber bullying, or retaliation, in our school building, on school grounds, or in school-related activities. We will investigate promptly all reports and complaints of bullying, cyber bullying, and retaliation, and take prompt action to end that behavior and restore the target's sense of safety. We will support this commitment in all aspects of our school community, including curricula, instructional programs, staff development, extracurricular activities, and parent or guardian involvement.

The Bullying Prevention and Intervention Plan ("Plan") is a comprehensive approach to addressing bullying, cyber bullying and retaliation, and the Schools are committed to working with students, staff, families, law enforcement agencies, and the community to prevent issues of violence. In consultation with these constituencies, we have established this Plan for preventing, intervening, and responding to incidents of bullying, cyber bullying, and retaliation. The Director at each School site is responsible for the implementation and oversight of the Plan.

PROCEDURES:

I. LEADERSHIP

The School's leadership at all levels will play a critical role in developing and implementing the Bullying Prevention and Intervention Plan. This will be completed as part of a greater effort to promote a positive school climate. Each School's leadership has a primary role in teaching students to be civil to one another and promoting understanding of and respect for diversity and difference. Leadership is defined with in the Schools as the Director and Administrative team, which may include but is not limited to an Assistant Director, Director of Operations, Clinical Director, Milieu Coordinator, Head Teacher, Nursing Director, and Director of Education. The School's Leadership is responsible for setting priorities and for staying up-to-date with current research on ways to prevent and effectively respond to bullying. It is also the responsibility of the Leadership to involve representatives from the greater school and local community in developing and implementing the Plan.

A. Public Involvement in Developing the Plan: As required by M.G.L. c. 71, § 370, this plan was developed/implemented in consultation with all staff members at each of the School sites (teachers, school staff, professional support staff, administrators), community representatives including sending school districts and involved collateral contacts, the local police department's Resource Officer, and students, parents, and guardians.
    1. Each School sent notices of the proposed policy and plan to families, guardians, local law enforcement, and community representatives and invited feedback prior to the implementation of the plan.
    2. Each School reviewed the proposed policy and plan in the October 2010 Special Education Parent Advisory Group meeting with families and guardians prior to the implementation of the plan.
    3. Each School reviewed the proposed plan with all students prior to implementation of the plan through a variety of means, including all-school community meetings, small group discussions, student focus groups, and, in cases where student needs required, during one-on-one consultation with students. Students were also invited to individually meet with the School's Director if they wished.
    4. Each School reviewed the proposed policy and plan with all current staff prior to the implementation of the plan in staff meetings at each campus. Staff was invited to provide feedback at this time or individually to school leadership over the following weeks.
    5. Feedback provided from all groups was implemented into this plan.

B. Assessing needs and resources: This Plan will be The School's blueprint for enhancing capacity to prevent and respond to issues of bullying within the context of other healthy school climate initiatives.
    1. Each School conducted an initial internal assessment via survey of current programming and concerns around bullying. The results were shared with the full staff team, parents, and students, and were integrated into this plan. The school will conduct additional assessments periodically moving forward.
    2. Each School conducted an initial review of current policies and procedures, and completed revisions as necessary to align policies and procedures with the new law. The school reviews all policies and procedures on an at-least annual basis and will continue to do so.
    3. Each School conducted an initial review of available internal data on bullying via incident reports and complaint forms, as well as via staff, student and parent interview, and implemented a process for additional data collection moving forward.
    4. Each School assessed available resources including curricula, training programs, internal and external resources and supports, and will assess periodically moving forward.
    5. Each School involved families and staff in this review process and invited their feedback. Families and staff received a written copy of the proposed plan prior to 12/6/10, and were asked to submit feedback prior to 12/17/10.
    6. Through this review, each School identified strengths in existing programming, resource gaps, patterns of behavior and effectiveness of responses, and the most significant areas of need based on initial assessment. The school will make adjustments ongoing as indicated through future periodic assessments.
    7. Each School used the collected information to develop prevention strategies including but not limited to supervision, professional development, age/developmentally appropriate curricula/curricula sensitive to the emotional needs and diagnoses of our students, and education and related resources for students and families.
    8. Each School continues to gather and review data internally (incident reports, bullying reports, student and parent surveys collected annually, feedback reviews from students after bullying prevention groups/workshops/programming), and uses such to gauge the effectiveness of programming in this area, and to develop additional programming as needed.

    9. Each School conducts an at-least annual review of policies and procedures and completed revisions as necessary to align policies and procedures with new laws. This included the Amendments to the Massachusetts Anti-bullying Law dated July 12, 2013. These amendments extended protection to students who are bullied by members of a school's staff,

including educators, administrators, school nurse, cafeteria and custodial workers, bus drivers, athletic coaches, extracurricular activity advisors and paraprofessionals.

10. In alignment with the law change in 2014, at least once every four years beginning with the 2015/2016 school year, each School will administer a Department of Elementary and Secondary –developed student survey to assess school climate and the prevalence, nature, and severity of bullying in our school. Additionally, the school will annually report bullying incident data to the Department.

C. Planning and Oversight
   1. Each School's Director will collect reports on all incidents of potential bullying.
   2. Each School's Director will collect and analyze all data as part of the quarterly review of risk management data with the School's Administrative Team. Additional reviews will be scheduled as indicated.
   3. Each School's Director will utilize current incident report recording and tracking procedures and complaint and grievance forms, in addition to a specific bully-report log to collect this data.
   4. Each School's Director will ensure all members of the staff team attend annual professional development topics on bullying prevention and intervention as required by law.
   5. Each School's Director will ensure that systems are put into place to support the needs of the targets and the aggressors.
   6. Each School's Director will choose and implement age appropriate evidence-based curricula to be used by each School on bullying prevention and intervention following the assessment of current available resources and need. Staff across the schools have been trained as trainers using curriculum and programming created by MARC at Bridgewater State University.
   7. Each School's Director will develop and implement policies and procedures on bullying prevention and intervention, including internet safety.
   8. Each School's Director will oversee the development of an age-appropriate summary of the Bullying Intervention Plan that is specific to the range of students served at the school.
   9. Each School's Director will ensure student and staff handbooks and codes of conduct are modified to reflect these changes.
   10. Each School's Director will work to involve parents in this plan, and to draft and implement parent information materials
   11. Each School's Director will review and update this plan annually, or more frequently as needed.

D. Developing priority statements
   1. Priority statements will be used to communicate the specifics of the vision of Each School's Bullying Prevention and Intervention Plan
   2. Priority statements will be developed and issued by each School's Director, following the results of the needs outcome and as needed to convey each School's vision that all members of the school community will treat each other in a civil manner and with respect for differences.
   3. Each School's priority statement comes from the understanding that the core population served at the school is, by definition, considered vulnerable for acts of bullying and harassment. The Schools are committed to providing all students with a safe learning environment that is free from bullying, cyberbullying, or other harmful or disruptive acts that can disrupt the learning process. This commitment is an integral part of our comprehensive efforts to promote learning, and to prevent and eliminate all forms of bullying and other acts that can interfere with learning and with emotional growth. The Plan is a comprehensive approach to addressing bullying and cyberbullying; we will work preventatively and investigate promptly all reports and complaints of bullying, cyberbullying and retaliation, and take prompt action to end that behavior and restore the target's sense of safety. We will support this commitment in all aspects of our Schools' communities, including curriculum, staff development, group interactions and events, and parent or guardian involvement.

II. TRAINING AND PROFESSIONAL DEVELOPMENT

A. Annual staff training on the Plan.

1. Annual training for all School staff will include staff duties under the Plan, a review of a staff member's responsibilities according to this plan, an overview of the steps that the Director of each School or designee will follow upon receipt of a report of bullying or retaliation, steps for encouraging social skill development and student safety, and an overview of the bullying prevention curricula to be offered at all grades throughout the school or district. In addition, training will include specifics related to the outcome of the initial review of current systems and needs.
2. All School staff will receive this annual training. All newly hired staff members are required to participate in bullying prevention and intervention training as part of orientation.

B. Ongoing professional development.

1. The goal of professional development 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 will build the skills of staff members to prevent, identify, and respond to bullying. As required by M.G.L. c. 71, § 37O, the content of school wide professional development will be informed by research and will include information on:

   (i) developmentally appropriate strategies to prevent bullying incidents;
   (ii) developmentally 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 a perpetrator, victim and witness to the 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 cyber bullying; and
   (vi) Internet safety issues as they relate to cyber bullying.

   Professional development will also address ways to prevent and respond to bullying or retaliation for students with disabilities that must be considered when developing students' Individualized Education Programs (IEPs). This will include a particular focus on the needs of students with autism-spectrum disabilities or students whose disability affects social skills development.

   Additional areas identified by the Schools for professional development include:
   - promoting and modeling the use of respectful language in interactions with staff, students, and community members;
   - fostering an understanding of and respect for diversity and difference;
   - building relationships and strong communication with families;
   - constructively managing classroom behaviors;
   - teaching students skills including positive communication, anger and emotion management, distress tolerance, social skills, cognitive flexibility/perspective taking, social and personal responsibility, and empathy for others;
   - engaging students in school/classroom planning and decision-making; and
   - maintaining a safe and caring classroom and school environment for all students.

2. Each School's Director is responsible for ensuring that staff responsible for staff training receive ongoing professional development in these areas in order to develop professional development training for all staff.

3. All training for staff will be documented and recorded in the personnel files.

C. Written notice to staff

1. Each School will provide all staff with an annual written notice of the Plan.

III. ACCESS TO RESOURCES AND SERVICES

A. Identified resources.

1. The Schools maintain a student to staff ratio in alignment with their DESE licensing. (Anchor Academy, 6:1; The Victor School, 8:1; Bay Cove Academy 11:1:1; Granite Academy, 8:1 or 12:1:1). Increased monitoring is available, including 1:1 support, for students at risk. Each School has professional clinical staff that meet regularly with students. Individual therapy, skills coaching, crisis prevention and response, family meetings, and social skill coaching, are all provided as outlined in each student's IEP. Students participate in regular group activities overseen by the clinical department. A group curriculum is cyclical and designed to be responsive to the needs of the group in-the-moment. At least annually, the following two topics are covered in group: Bullying Identification, Prevention, and Intervention and Anti-Bullying-Social Skills. Themes of groups also include tolerance and respect for diversity, managing difficult situations/accessing help, and general problem solving. Each School is able to provide counseling and other services for targets, aggressors, and their families on site via these means.
2. Each School will utilize community or JRI-wide resources if it is in need of more services than the site can provide.
3. Each School will continue to assess capacity for providing counseling and services to targets, aggressors, and their families.

B. Counseling and other services:

1. Each School will access clinical and counseling staff for cultural and linguistic resources if possible. The Schools maintain a list of resources available within the school and within the larger JRI organization and will access as necessary to provide necessary counseling services to each student. If the resources are not available on campus, the Schools will contract with an outside agency to provide the resources.
2. Each School will also work closely with other agency programs, including JRI's Community Based Service Providers, Behavioral Health Clinics, the Trauma Center, GLASS, and JRI Health Services to access additional counseling services as needed.
3. The Director, in conjunction with the school's clinical staff, will oversee the development of safety plans for students who have been targets of bullying or retaliation, the provision of social skills programs to prevent bullying, and the provision of education and/or intervention services for students exhibiting bullying behaviors. This may include behavioral intervention plans, social skills groups, and individual plans for students.

C. Students with disabilities.

1. As required by M.G.L. c. 71B, § 3, 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 activities a student may participate in or is vulnerable to bullying, harassment, or teasing because of his/her 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.

D. Referral to Outside Services:

1. Each School will follow current school policy and procedures for outside referrals if the necessary services cannot be provided within the agency.

IV. ACADEMIC AND NON-ACADEMIC ACTIVITIES

The Schools will review evidence based curricula on bullying prevention and intervention. These curricula will address the following approaches deemed priorities for the needs of the students of the Schools:

A. Specific bullying prevention approaches.

1. Bullying prevention curricula will be informed by current research which, 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 engaged in acts of bullying or retaliation, including seeking adult assistance;
    - helping students understand the dynamics of bullying and cyber bullying, including the underlying power imbalance;
    - emphasizing cyber safety, 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.

Initiatives will also teach students about the student-related sections of the Bullying Prevention and Intervention Plan. The Schools will review the Plan with students annually during community meeting and during group sessions where the bullying curriculum is presented.

B. General teaching approaches that support bullying prevention efforts.

1. The following approaches are integral to establishing a safe and supportive school environment. These underscore the importance of our bullying intervention and prevention initiatives:
    - setting clear expectations for students and establishing school and classroom routines;
    - creating safe school and classroom environments for all students, including for students with disabilities, lesbian, gay, bisexual, questioning or transgender students, disabled and homeless students;
    - using appropriate and positive responses and reinforcement, even when students require disciplinary action;
    - using a positive, skill building, strengths based approach;
    - encouraging adults to develop positive relationships and maintaining strong boundaries with students;
    - modeling, teaching, and rewarding pro-social, healthy, and respectful behaviors;
    - using positive approaches to behavioral health, including collaborative problem-solving, conflict resolution training, teamwork, and positive behavioral supports that aid in social and emotional development;
    - using the Internet safely; and
    - supporting students' interest and participation in non-academic and extracurricular activities, particularly in their areas of strength.

V. POLICIES AND PROCEDURES FOR REPORTING AND RESPONDING TO BULLYING AND RETALIATION

A. Reporting bullying or retaliation.

1. Reports of bullying or retaliation may be made by staff, students, parents or guardians, or others, and may be oral or written. Oral reports made by or to a staff member shall be recorded in writing. All staff at the Schools are required to report immediately to the Director or

designee any instance of bullying or retaliation the staff member becomes aware of or witnesses. Reports made by students, parents or guardians, or other individuals who are not School staff members, may be made anonymously.

2. The Schools will use the existing grievance form for such reports. The Schools will ensure this form is available at intake and throughout designated areas of the campus, including the main office, classrooms, and clinical/milieu spaces; this form is also available on the Schools' server. The Schools will ensure all parents and school community members know the contact information for the Director and administrative team members so that they can make reports by phone, email, fax, or mail. The form will be available in most prevalent languages of the origin of students and parents/guardians.

   At the beginning of each school year, each School will provide the school community, including administrators, staff, students, and parents or guardians, with written notice of its policies for reporting acts of bullying and retaliation. A description of the reporting procedures and resources, including the name and contact information of the Director or designee, will be incorporated in student and staff handbooks, on the school or district website, and in information about the Plan that is made available to parents or guardians.

3. Reporting by Staff
   - A staff member will report immediately to the Director or designee when he/she/they witness or becomes aware of conduct that may be bullying or retaliation. The requirement to report to the Director or designee does not limit the authority of the staff member to respond to behavioral or disciplinary incidents consistent with the School's policies and procedures for student management as outlined in the Handbook or Code of Conduct.

4. Reporting by Students, Parents or Guardians, and Others
   - Each School expects students, parents or guardians, and others who witness or become aware of an instance of bullying or retaliation involving a student to report it to the Director or designee as soon as practicable. Reports may be made anonymously, but 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. Students will be provided practical, safe, private and age-appropriate ways to report and discuss an incident of bullying with a staff member, or with the Director or designee.

B. Responding to a report of bullying or retaliation.

1. Safety

   Before fully investigating the allegations of bullying or retaliation, the Director or designee will take steps to assess the need to restore a sense of safety to the alleged target and/or to protect the alleged target from possible further incidents. Responses to promote safety may include, but not be limited to, creating a personal safety plan; pre-determining seating arrangements for the target and/or the aggressor in the classroom, at lunch, or in groups; identifying a staff member who will act as a "safe person" for the target; providing one-on-one support or "escort" to enhance the safety of the target, and altering the aggressor's schedule and access to the target. The Director or designee will take additional steps to promote safety during the course of and after the investigation, as necessary.

   The Director or designee will implement appropriate strategies for protecting from bullying or retaliation a student who has reported bullying or retaliation, a student who has witnessed bullying or retaliation, a student who provides information during an investigation, or a student who has reliable information about a reported act of bullying or retaliation.

2. Obligations to Notify Others

a. Notice to parents or guardians: Upon determining that bullying or retaliation has occurred, the Director or designee will promptly notify the parents or guardians of the target and the aggressor of this, and of the procedures for responding to it. There may be circumstances in which the Director or designee contacts parents or guardians prior to any investigation. Notice will be consistent with state regulations at 603 CMR 49.00. Parents/guardians are also informed of the DESE's problem resolution system and the process for accessing this system, regardless of the outcome of the bullying determination.

b. Notice to Another School or District: If the reported incident involves students from more than one school district, charter school, non-public school, approved private special education day school, or collaborative school, the Director or designee first informed of the incident will promptly notify by telephone the principal or designee of the other school(s) of the incident so that each school may take appropriate action. All communications will be in accordance with state and federal privacy laws and regulations, and 603 CMR 49.00.

c. Notice to Law Enforcement: At any point after receiving a report of bullying or retaliation, including after an investigation, if the Director or designee has a reasonable basis to believe that criminal charges may be pursued against the aggressor, the School Director or designee will notify the local law enforcement agency. Notice will be consistent with the requirements of 603 CMR 49.00 and locally established agreements with the local law enforcement agency. Also, if the incident occurs on school grounds and involves a former student under the age of 21 who is no longer enrolled in the school, the Director or designee shall contact the local law enforcement agency if he or she has a reasonable basis to believe that criminal charges may be pursued against the aggressor.

d. In alignment with guidance provided by the 2014 Act Relative to Bullying in Schools, from Chapter 86 Section 4(k), the School annually reports bullying incident data to DESE no later than July 15. The data includes, but is not limited to:

i. the number of reported allegations of bullying or retaliation
ii. the number and nature of substantiated incidents of bullying or retaliation
iii. the number of students disciplined for engaging in bullying or retaliation
iv. any other information required by the department

C. Investigation.

1. The School's 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 involved.
2. During the investigation the Director or designee may, as appropriate among other things, interview students, staff, witnesses, parents or guardians, and others as necessary. The Director or designee (or whoever is conducting the investigation) will remind the alleged aggressor, target, and witnesses that retaliation is strictly prohibited and will result in disciplinary action. Interviews may be conducted by the Director or designee, other staff members as determined by the Director or designee, and in consultation with the clinician, as appropriate. To the extent practicable, and given his/her obligation to investigate and address the matter, the Director or designee will seek to maintain confidentiality during the investigative process. The Director or designee will maintain a written record of the investigation.
3. Procedures for investigating reports of bullying and retaliation will be consistent with the School's policies and procedures for investigations. If necessary, the Director or designee may consult with legal counsel about the investigation.

D. Determinations.

1. The Director or designee will, in consultation with the school Ad Team make a determination based upon all of the facts and circumstances. If, after investigation, bullying or retaliation is substantiated, the Director or designee will take steps reasonably calculated to prevent recurrence and to ensure that the target is not restricted in participating in school or in benefiting from school activities. The Director or designee will: 1) determine what remedial action is required, if any, and 2) determine what responsive actions and/or disciplinary action is necessary. The range of disciplinary action is noted in the Handbook and/or Code of Conduct, issued annually to all students, parents/guardians, and staff.
2. Depending upon the circumstances, the Director or designee may choose to consult with the students' teacher(s) and clinician, and the target's or aggressor's parents or guardians, to identify any underlying social or emotional issue(s) that may have contributed to the bullying behavior and to assess the level of need for additional social skills development.
3. The Director or designee will promptly notify the parents or guardians of the target and the aggressor about the results of the investigation and, if bullying or retaliation is found, what action is being taken to prevent further acts of bullying or retaliation. All notice to parents must comply with applicable state and federal privacy laws and regulations. Because of the legal requirements regarding the confidentiality of student records, the Director or designee cannot report specific information to the target's parent or guardian about the disciplinary action taken unless it involves a "stay away" order or other directive that the target must be aware of in order to report violations.
4. In alignment with the update to the law in 2014, the Director will inform the parent or guardian of the target about the Department of Elementary and Secondary Education's problem resolution system and the process for accessing that system, regardless of the outcome of the bullying determination.

E. Responses to Bullying.

1. Teaching Appropriate Behavior through Skills-Building

   Upon the Director or designee determining that bullying or retaliation has occurred, the law requires that the School uses a range of responses that balance the need for accountability with the need to teach appropriate behavior. M.G.L. c. 71, § 37O(d)(v). Skill-building approaches that the Director or designee may consider include:

   - offering individualized skill-building sessions based on the School's anti-bullying group curriculum.
   - providing relevant educational activities for students or groups of students in consultation with the clinical and administrative teams
   - implementing a range of academic and nonacademic positive behavioral supports to help students understand the prosocial ways to achieve their goals
   - meeting with parents and guardians to engage parental support and to reinforce the anti-bullying curriculum and social skills building activities at home
   - coordinating with outpatient provider teams for additional support
   - coordinating with the local Resource Officer for additional support and education for involved students or families
   - adopting plans/goals to include a focus on developing specific social skills
   - making a referral for evaluation

2. Taking Disciplinary Action
   - If the Director decides that disciplinary action is appropriate, the disciplinary action will be determined based on the totality of the circumstances including, the facts found by the Director or designee, the nature of the conduct, the age of the student(s) involved, and the need to balance accountability with the teaching of appropriate behavior. Discipline will be consistent with the Plan and with the School's behavior management system. The range of disciplinary actions is outlined in the Code of Conduct and/or the Student Handbook.
   - Discipline procedures for students with disabilities are governed by the federal Individuals with Disabilities Education Improvement Act (IDEA), which are in cooperation with state laws regarding student discipline.

- If the Director or designee determines that a student knowingly made a false allegation of bullying or retaliation, that student may be subject to disciplinary action.
- Retaliation following reports of bullying are prohibited, and also subject to disciplinary action.

3. Promoting Safety for the Target and Others
   - The Director or designee will consider what adjustments, if any, are needed in the school environment to enhance the target's sense of safety and that of others as well. One strategy that the Director or designee may use is to increase adult supervision at transition times and in locations where bullying is known to have occurred or is likely to occur.
   - For a reasonable period of time following the determination and the ordering of remedial and/or disciplinary action, the Director or designee will periodically contact the target to determine whether there has been a recurrence of the prohibited conduct and whether additional supportive measures are needed. If so, the Director or designee will work with appropriate school staff to implement them immediately.

F. Responding to a Report of Bullying by School Staff

1. **Safety**

Before fully investigating the allegations of bullying or retaliation, the Director or designee will take steps to assess the need to restore a sense of safety to the alleged target and/or to protect the alleged target from possible further incidents. Responses to promote safety may include, but not be limited to, creating a personal safety plan; identifying a staff member who will act as a "safe person" for the target; providing one-on-one support or "escort" to enhance the safety of the target, and altering the aggressor's schedule and access to the target. The Director or designee will take additional steps to promote safety during the course of and after the investigation, as necessary.

The Director or designee will implement appropriate strategies for protecting from bullying or retaliation a student who has reported bullying or retaliation, a student who has witnessed bullying or retaliation, a student who provides information during an investigation, or a student who has reliable information about a reported act of bullying or retaliation.

2. **Obligations to Notify Others**

   a. Notice to parents or guardians: Upon determining that bullying or retaliation has occurred, the Director or designee will promptly notify the parents or guardians of the target and of the procedures for responding to it. There may be circumstances in which the Director or designee contacts parents or guardians prior to any investigation. Notice will be consistent with state regulations at 603 CMR 49.00. In this scenario, as the alleged aggressor is a staff member, the Director and head of Human Resources would also be notified. Parents/guardians are also informed of the DESE's problem resolution system and the process for accessing this system, regardless of the outcome of the bullying determination.

   b. Notice to Another School or District: If the reported incident involves students from more than one school district, charter school, non-public school, approved private special education day school, or collaborative school, the Director or designee first informed of the incident will promptly notify by telephone the principal or designee of the other school(s) of the incident so that each school may take appropriate action. All communications will be in accordance with state and federal privacy laws and regulations, and 603 CMR 49.00.

c. Notice to Law Enforcement: At any point after receiving a report of bullying or retaliation, including after an investigation, if the Director or designee has a reasonable basis to believe that criminal charges may be pursued against the aggressor, the Director or designee will notify the local law enforcement agency. Notice will be consistent with the requirements of 603 CMR 49.00 and locally established agreements with the local law enforcement agency.

d. d. In alignment with guidance provided by the 2014 Act Relative to Bullying in Schools, from Chapter 86 Section 4(k), the School annually reports bullying incident data to DESE no later than July 15 annually. The data includes, but is not limited to:
   i. the number of reported allegations of bullying or retaliation
   ii. the number and nature of substantiated incidents of bullying or retaliation
   iii. the number of students disciplined for engaging in bullying or retaliation
   iv. any other information required by the department

3. **Investigation**

a. The 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 involved.

b. During the investigation the Director or designee may as appropriate, among other things, interview students, staff, witnesses, parents or guardians, and others as necessary. The Director or designee will remind the alleged aggressor, target, and witnesses that retaliation is strictly prohibited and will result in disciplinary action. Interviews with the staff member alleged to be involved may be conducted with a representative of Human Resources, as appropriate. To the extent practicable, and given his/her obligation to investigate and address the matter, the Director or designee will seek to maintain confidentiality during the investigative process. The Director or designee will maintain a written record of the investigation.

c. In alignment with the Schools' Personnel policies, the staff member may be placed on leave during the period of investigation.

d. Procedures for investigating reports of bullying and retaliation will be consistent with School policies and procedures for investigations. If necessary, the Director or designee may consult with legal counsel about the investigation.

4. **Determinations**

a. The Director or designee in consultation with the school's Ad Team will make a determination based upon all of the facts and circumstances. If, after investigation, bullying or retaliation is substantiated, the Director or designee will take steps reasonably calculated to prevent recurrence and to ensure that the target is not restricted in participating in school or in benefiting from school activities. The Director or designee will: 1) determine what remedial action is required, if any, and 2) determine what responsive actions and/or disciplinary action is necessary. The range of disciplinary action is noted in the Personnel Manual, distributed to all staff at hire.

b. The Director or designee will promptly notify the parents or guardians of the target and the aggressor about the results of the investigation and, if bullying or retaliation is found, what action is being taken to prevent further acts of bullying or retaliation. All notice to parents must comply with applicable state and federal privacy laws and regulations. Because of the legal requirements regarding the confidentiality of personnel records, the Director or designee cannot report specific information to the target's parent or guardian about the disciplinary action taken unless it involves a "stay away" order or other directive that the target must be aware of in order to report violations.

c. In alignment with the update to the law in 2014, the Director will inform the parent or guardian of the target about the Department of Elementary and Secondary Education's problem resolution system and the process for accessing that system, regardless of the outcome of the bullying determination.

5. **Responses to Bullying**

a. Taking Disciplinary Action

- If the Director decides that disciplinary action is appropriate, the disciplinary action will be consistent with the Personnel Manual. A range of disciplinary action is outlined in the staff Personnel Manual.
- If the Director or designee determines that a student knowingly made a false allegation of bullying or retaliation, that student may be subject to disciplinary action.
- Retaliation following reports of bullying are prohibited, and also subject to disciplinary action.

b. Re-education

All staff receive training on bullying and harassment identification, prevention and response at hire and at least annually. Staff members in violation of the school's Plan would be mandated to complete additional training in this area, as assigned by the Director.

c. Promoting Safety for the Target and Others

- The Director or designee will consider what adjustments, if any, are needed in the school environment to enhance the target's sense of safety and that of others as well.
- Within a reasonable period of time following the determination and the ordering of remedial and/or disciplinary action, the Director or designee will contact the target to determine whether there has been a recurrence of the prohibited conduct and whether additional supportive measures are needed. If so, the Director or designee will work with appropriate school staff to implement them immediately.

VI. COLLABORATION WITH FAMILIES

A. Parent education and resources.

The Schools will offer education programs for parents and guardians that are focused on the parental components of the anti-bullying curricula and any social competency curricula used by the Schools, including how parents and guardians can support the Plan and reinforce key aspects at home. The Schools regularly provides educational sessions for parents on social skill development, monitoring student relationships, bullying dynamics, internet safety, and identifying, preventing and responding to bullying and cyber bullying. The programs will be offered in collaboration with the Special Education Parent Advisory Group. Parents, through the PAG, are welcome to request additional training opportunities, which the school will provide either through internal resources or via consultation with external resources.

B. Notification requirements.

Each year the Schools will inform parents or guardians of enrolled students about the anti-bullying curricula that are being used. This notice will include information about the dynamics of bullying, including cyber bullying and online safety. The Schools will send parents written notice each year about the student-related sections of the Plan and the school's Internet safety policy (included in Student Handbook). All notices and information made available to parents or guardians will be in hard copy and electronic formats, and will be available in the language(s) most prevalent among parents or guardians. The Schools will also have information available on site for parents and guardians, located in the main office.

VII. PROHIBITION AGAINST BULLYING AND RETALIATION

Acts of bullying, which include cyber bullying, are prohibited:

(i) on school grounds and property immediately adjacent to school grounds, at a school-sponsored or school-related activity, function, or program whether on or off school grounds, in vehicles owned, leased, or used by the School; or through the use of technology or an electronic device owned, leased, or used by the School; and

(ii) at a location, activity, function, or program that is not school-related through the use of technology or an electronic device that is not owned, leased, or used by the School, if the acts create a hostile environment at school for the target or witnesses, infringe on their rights at school, or materially and substantially disrupt the education 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.

As stated in M.G.L. c. 71, § 37O, nothing in this Plan requires the School to staff any non-school related activities, functions, or programs.

VIII. Problem Resolution System

Chapter 86 of the Acts of 2014 amended Section 370 of Chapter 71 of the General Laws to include (g) (v): The Plan shall inform parents or guardians of the target about the Department's problem resolutions system and the process for seeking assistance or filing a claim through the problem resolution system. This information will be made available in both hard copy and electronic formats. This information is available regardless of the outcome of any bullying determination.

Any parent wishing to file a claim/concern or seeking assistance outside of the district may do so with the Department of Elementary and Secondary Education Program Resolution System (PRS). That information can be found at:

http://www.doe.mass.edu/pqa

Emails can be sent to compliance@doe.mass.edu.

Additionally, individuals can call 781-338-3700. Hard copy of this information is available at reception at our school.

IX. DEFINITIONS

Several of the following definitions are copied directly from M.G.L. c. 71, § 37O, as noted below.
Aggressor (or perpetrator) is a person who engages in bullying, cyber bullying, or retaliation.

Bullying, as defined in M.G.L. c. 71, § 37O, is the repeated use by one or more students or by a member of a school staff including, but not limited to, an educator, administrator, school nurse, cafeteria worker, custodian, bus driver, athletic coach, advisor to an extra curricular activity, or paraprofessional of a written, verbal, or electronic expression or a physical act or gesture or any combination thereof, directed at a victim t 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 herself or of damage to his or her property;
iii. creates a hostile environment at school for the target;
iv. infringes on the rights of the target at school;or
v. materially and substantially disrupts the education process or the orderly operation of a school.

Cyber bullying, is bullying through the use of technology or electronic devices such as telephones, cell phones, computers, and the Internet. It includes, but is not limited to, email, instant messages, text messages, and Internet postings. See M.G.L. c. 71, § 37O for the legal definition of cyber bullying.

Allegations of bullying or retaliation are written or oral reports of bullying or retaliation made by staff, students, parents, guardians or others.

Substantiated incidents of bullying or retaliation are incidents that, after investigation, were determined to be bullying or retaliation.

Students disciplined for engaging in bullying or retaliation are the number of students removed, suspended, or expelled as a result of an incident of bullying or retaliation.

Hostile environment, as defined in M.G.L. c. 71, § 37O, 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 is any form of intimidation, reprisal, or harassment directed against a person who reports bullying, provides information during an investigation of bullying, or witnesses or has reliable information about bullying.

School staff includes, but is not limited to, educators, administrators, counselors, clinicians, the school nurse, cafeteria workers, custodians, bus drivers, athletic coaches, advisors to extracurricular activities, support staff, or paraprofessionals.

Target (or victim) is a student against whom bullying, cyber bullying, or retaliation has been perpetrated.

IX. RELATIONSHIP TO OTHER LAWS

Consistent with state and federal laws, and the policies of the school or district, no person shall be discriminated against in admission to a public school of any town or in obtaining the advantages, privilege and courses of study of such public school on account of race, color, sex, gender identity or expression, religion, national origin, or sexual orientation. Nothing in the Plan prevents the school or district 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 school policies. In addition, nothing in the Plan is designed or intended to limit the authority of the school or district to take disciplinary action or other action under M.G.L. c 71, § 37 H or 37H ½, other applicable laws, or local school or district policies in response to violent, harmful, or disruptive behavior, regardless of whether the Plan covers the behavior.

Day School Director

8/13/26
Date

Lindsay Savageau, M.Ed.
Vice President/Superintendent of JRI Day Schools

6/8/26
Date