

Policy Title: Bullying Prevention and Intervention Plan		
Guild Program: Youth Program	Date Approved by CEO: 5-31-19	Date Approved by Board: 6-11-19
Licensing Agencies: DESE		Date(s) Approved by Licensing:
Internal Procedure Reference:	Legal Authority References: M.G.L. c. 71, § 37O,	

The mission of The Guild for Human Services is to educate, encourage and empower individuals with intellectual disabilities so they may achieve their full potential to lead high-quality lives and participate meaningfully in society. The Guild for Human Services Bullying Prevention and Intervention Plan is a comprehensive approach to addressing bullying, cyber-bullying and retaliation. The Guild for Human Services is committed to working with students, staff, families and law enforcement to prevent issues of bullying behavior.

All students who are part of the Guild for Human Services are supported by behavior support plans that support positive behaviors. Challenging behaviors such as aggression, inappropriate verbal comments, teasing and property destruction are outlined in the student's individualized plans with specific staff interventions to these target behaviors. These behaviors are addressed throughout the student's day and team members are constantly evaluating progress in these areas and adding additional interventions if needed.

The Guild for Human Services Bullying Prevention and Intervention Plan applies to students and members of a school staff, including, but not limited to educators, administrators, school nurses, cafeteria workers, custodians, bus drivers, athletic coaches, advisors to an extracurricular activity and paraprofessionals.

Leadership:

Leadership at all levels of the Guild for Human Services administrative team will play a critical role in developing and implementing Bullying Prevention and Intervention Plan in the context of other whole school and community efforts to promote positive school climate. The Chief Officers and Directors at The Guild have a significant role in teaching students to be civil to one another and promoting understanding of and respect for diversity and difference. Through such structures as our employee code of conduct and agency wide Diversity Plan, The Guild has established expectations around respectful conduct. By implementing Positive Behavioral Interventions and supports, respect is

operationalized and taught in all settings. Guild leadership will continue to set priorities by using data and staying current with best practices around bullying prevention. These individuals are 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 leaders to involve representatives from the greater school and local community in developing and implementing the Plan.

A. Involvement in Developing the Plan: The Guild will seek out public involvement in developing the Plan. As required by M.G.L. c. 71, § 37O, the Plan must will developed in consultation with teachers, school staff, professional support personnel, school volunteers, administrators, community representatives, local law enforcement agencies, students, parents and guardians. The plan will be shared with students, staff and parents and guardians as well as outside agencies as seen fit for feedback. Input from these individuals will be taken and implemented into the plan as appropriate.

B. Assessing needs and resources: The Guild for Human Services has a bullying curriculum that students participate in. If a report of bullying is submitted the Guild leadership reviews the incident and determines what follow up is necessary.

Annually Guild leadership will assess the adequacy of current programs; review current policies and procedures; and review available data on bullying and behavioral incidents; and assess available resources including curricula, training programs, and behavioral health services.

In addition to looking at the above information at least once every four years beginning with 2015/16 school year, The Guild for Human Services will administer a Department of Elementary and Secondary-developed student survey to assess school climate and the prevalence, nature, and severity of bullying at The Guild for Human Services. Additionally, The Guild School for Human Services will annually report bullying incident data to the Department.

The Guild for Human Services will also review bullying reports periodically to help to identify patterns of behaviors and areas of concern, and will inform decision-making for prevention strategies including, but not limited to, adult supervision, professional development, age-appropriate curricula, and in-school support services.

C. Planning and Oversight: The Chief Education Officer or designee is responsible for the oversight of the plan. Specific oversight responsibilities may include:

- Receiving reports on bullying
- Maintaining data on bullying and assessing procedures to reduce incidences of bullying
- Planning on-going professional development

- Planning supports for aggressor and target
- Developing or revising the Bullying Prevention and Intervention Plan
- Reviewing and updating the plan yearly
- Ensuring staff are trained on the plan
- Coordinate parent awareness of the Bullying Prevention and Intervention Plan
- Assessing additional resources the agency may need surrounding this topic.

D. Developing priority statements and Guild for Human Services Philosophy:

The Guild for Human Services Bullying Prevention and Intervention Plan (“Plan”) is a comprehensive approach to addressing bullying and cyberbullying, and is committed to working with students, staff, families, law enforcement agencies, and the community to prevent issues of violence. The Guild for Human Services has developed priority statements regarding the school’s philosophy on bullying.

- The Guild for Human Service expects that all members of the school community will treat each other in a civil manner and with respect for differences.
- The Guild for Human Services is committed to providing all students with a safe learning environment that is free from bullying and cyberbullying. 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 that can impede the learning process.
- The Guild for Human Services recognizes that certain students may be more vulnerable to become targets of bullying, harassment, or teasing based on actual or perceived characteristics, including race, color, religion, ancestry, national origin, sex, socioeconomic, status, homelessness, academic status, gender identity or expression, physical appearance, or sensory, disability, or by association with a person who has or is perceived to have one or more of these characteristics. The Guild for Human Services will identify specific steps it will take 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, or teasing.
- The Guild for Human Services will not tolerate any unlawful or disruptive behavior, including any form of bullying, cyberbullying, or retaliation, in our school buildings, on school grounds, or in school-related activities. We will 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 school community, including curricula,

instructional programs, staff development, extracurricular activities, and parent or guardian involvement.

- The philosophy of The Guild for Human Services is based on the belief that all students have the right to access a diverse array of services that will help them acquire the skills and behaviors necessary to live and work as independently as possible in the community
- The Guild for Human Services expects that all community members will treat each other with respect at all times

Training and Professional Development:

Professional development will take place yearly and staff will be trained on their roles and responsibilities under the law and teach them to prevent, identify and respond to bullying.

Training will include an overview of the steps that the Chief Education Officer or designee will follow upon receipt of a report of bullying or retaliation and an overview of the bullying curriculum that is offered at The Guild for Human Services. In addition professional development will be based on research and include the following information on:

- (i) developmentally appropriate strategies to prevent bullying
- (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 an aggressor, target, and witnesses to the bullying;
- (iv) research findings on bullying, including information about specific categories of students who have been shown to be at particular risk for bullying;
- (v) information on the incidence and nature of cyber bullying and
- (vi) internet safety issues as they relate to cyber bullying

Additional areas that The Guild for Human Services identified for professional development include:

- promoting and modeling use of respectful language
- fostering an understanding of respect for diversity and difference
- building relationships and communicating with families
- managing classroom behavior
- using positive behavioral intervention strategies
- teaching students skills including positive communication, anger management, and empathy for others
- engaging students in behavior plan management and decision making
- maintaining a safe environment for everyone

Training Plan: All staff will receive a copy of the bullying prevention plan as part of their orientation when hired.

All staff will be in-serviced on the plan annually.

The training will include staff duties and responsibilities under the plan and an overview of the steps followed upon receipt of a bullying or retaliation report as well as an overview of the bullying curriculum offered. Professional development will address ways to prevent or respond to bullying or retaliation for students with disabilities that must be considered when developing students Individualized Education Plans. In addition staff will be trained on specific vocabulary related to bullying.

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 may participate in or is vulnerable to bullying, harassment, or teasing because of his/her disability the IEP team will consider what should be included in the IEP to develop student's skills and proficiencies to avoid and respond to bullying, harassment, or teasing.

Access to Resources and Services

The Guild for Human Services wants to ensure that the needs of targets, student aggressors, families and others are addressed. Students at The Guild for Human Services will participate in a bullying curriculum and if a bullying related issue arises they will address the specific incident with a counselor.

Identifying Counseling and other resources: The Guild for Human Services has mental health clinicians and behavior clinicians on staff. As part of the needs assessment the Guild will determine if the current staffing is sufficient to address the number of bullying related incidents that take place.

Students with Disabilities: 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 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.

Academic and Non-Academic Activities

Specific bullying prevention approaches- Bullying prevention curricula will be informed by current research and among other things emphasize 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 safe, supportive school environment that is respectful of diversity and difference
- Differentiate between types of bullying and be shown examples

General teaching approaches that support bullying prevention efforts- The following approaches are integral to establishing a safe and supportive school environment.

- Setting clear expectations for students and establishing school and classroom routines through the use of behavior treatment plans and daily schedules
- Creating safe school and classroom environments for all students, including for students with disabilities, lesbian, gay, bisexual, transgender students, and homeless students
- Using appropriate and positive responses and reinforcement, even when students require discipline;
- Using positive behavioral supports;
- Encouraging adults to develop positive relationships 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' interests and participation in non-academic and extracurricular activities, particularly in their areas of strength

Students at The Guild for Human Services will be provided age appropriate curriculum on what bullying means and what to look for as well as the procedure for responding to bullying. Materials will be modified for student understanding.

Policies and Procedures for Reporting Incidents of Bullying and Retaliation

Reports of bullying or retaliation may be made by the student, staff, parent, guardian or any other individual that witnesses the incident and may be oral or written. Oral reports made by a staff member must be then recorded in writing. The reports should immediately be reported to the Chief Education Officer or designee. A report made by students, parents or guardians, or other individuals who are not school staff, may be made anonymously. All Guild for Human Services staff are mandated to report an incident.

Responding to a report of bullying or retaliation

Before an investigation into an allegation of bullying or retaliation the Chief Education Officer or designee will take steps to assess the need to restore safety to the alleged target and/or to protect the alleged target from possible further incidents. Responses may include but are not limited to, developing an individual safety plan, pre-determined classroom seating arrangements for the target and aggressor, pre-determined classroom residential arrangements for the target and aggressor, lunch assignments for the target and aggressor and seating arrangements in vehicles for target and aggressor. In addition, the target will work with a clinician on processing the incident and if necessary the schedule of the target and/or aggressor may be altered.

The Guild for Human Services 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.

Obligations to notify others

1. Upon determination that bullying has occurred the Chief Education or designee will notify the parent/guardian of both the target and the aggressor of the incident and the procedures for responding to the incident. The Guild for Human Services may contact parents or guardians prior to or during the investigation. Notice will be consistent with state regulations at 603 CMR 49.00.
2. If the reported incident involves student(s) from another school or district The Guild for Human Services will promptly notify by telephone the principal or designee of that school(s) of the incident so each school may take appropriate action. All communication will be in accordance with state and federal privacy laws and regulations, and 603 CMR 49.00. In addition once the Guild determines that bullying has occurred the Chief

Education Officer or designee will notify the LEA of the sending district of both the target and aggressor.

3. At any point after receiving a report of bullying or retaliation, including after an investigation, if the Chief Education Officer or designee has a reasonable basis to believe that criminal charges may be pursued against the aggressor, the principal will notify the local law enforcement agency. Notice will be consistent with the requirements of 603 CMR 49.00. Also if an incident occurs on school grounds and involves a (former student under the age 21) visitors or volunteers who is no longer enrolled in the school, the Chief Education 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.

Investigation

The Chief Education Director or designee will promptly investigate all reports of bullying and retaliation. In completing the investigation all known information will be thoroughly reviewed. The anti-bullying committee will be advised of the investigation and assist as needed.

During the investigation, The Chief Education Officer or designee may, among other things, interview students, staff, witnesses, parents/guardians and others as necessary. During interviews the Chief Education Officer or designee will remind the alleged aggressor, target and witnesses that retaliation is strictly prohibited and will result in disciplinary action.

Interviews may be conducted a member of the Clinical Department as appropriate. To the extent practicable; and given his/her obligation to investigate and address the matter, the Chief Education Officer or designee will maintain confidentiality during the investigation. In addition a written record will be maintained of the investigation and results.

Procedures for investigating reports of bullying and retaliation will be consistent with the school policies and procedures for investigations. If necessary the Chief Education Officer or designee may consult with legal counsel about the investigations.

Determinations

The Chief Education Officer or designee will make a determination based upon all of the facts and circumstances. After a complete investigation if bullying or retaliation is substantiated, the Chief Education Officer or designee will take steps to prevent recurrence and to ensure that the target is not restricted from participating in all school, after-school and residential activities. The Chief Education or designee will 1 (determine what remedial action is required, if any, and 2) determine what responsive actions and/or disciplinary action is necessary.

Depending on the circumstances, the Chief Education Officer or designee may consult with the students' teacher, counselor and the target or aggressors parents or guardians, to identify any underlying social or emotional issue(s) that may have contributed to the bullying incident and to assess the level of need for additional social skills development.

A designated team member will notify the parents/guardians of both the target and aggressor regarding the results of the investigation and, if bullying or retaliation is found, what action is being taken to prevent further acts of bullying and retaliation. All notice to parents must comply with applicable state and federal privacy laws and regulations. Due to legal requirements regarding confidentiality of student records, the Chief Education Officer or designee cannot report specific information to the target's parents or guardian about 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.

The Chief Education Officer or designee 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.

Responses to bullying

The Guild for Human Services Bullying Prevention and Intervention Plan details strategies for building students' skills and awareness of bullying and retaliation. The Guild utilizes a wide range of strategies that are individualized for student understanding.

Teaching appropriate behavior through skills building- Upon the determination that bullying or retaliation has occurred The Guild for Humans Services will use a range of responses that balance the need for accountability with the need to teach appropriate behavior. These may include:

- Offering individual or small group skill building sessions based upon the anti-bullying curriculum
- Implement positive behavioral supports to help students understand pro-social ways to achieve their goals
- Provide relevant teaching for students, in consultation with a clinician and other appropriate staff
- Modify individual behavior treatment plans to include a focus on developing appropriate social skills

Taking Disciplinary Action-If it is determined that disciplinary action is appropriate, the disciplinary action will be determined on the basis of facts that are found during the investigation, including 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 Guild for Human Services Bullying Prevention and Intervention policy and The Guild for Human Services behavior management policies.

Discipline procedures for students with disabilities follow the guidelines set forth by the federal individuals with Disabilities Education Act (IDEA).

Promoting Safety for the Target and Others-

The Chief Education Officer or designee will determine if any changes need to be made to the school environment to enhance the targets sense of safety and that of others. Strategies that could be implemented include change of classroom or residence.

Within a reasonable period of time following the determination and the ordering of remedial and or disciplinary action, the principal or designee will contact the target and determine whether there has been a recurrence of the prohibited contact and whether additional supportive measures are needed. If so, the Chief Education Officer or designee will work with the appropriate school staff to implement appropriate measures.

Collaboration with Families

The Guild for Human Services will make an effort to collaborate with students' families in order to increase the capacity of the school to prevent and respond to bullying.

Parent Education and Resources-The Guild for Human Services will offer information for parents and guardians on the parental components of the anti-bullying curriculum offered. Bullying and Retaliation is a topic that may be addressed in Monthly Parent groups.

Notification Requirements-Each year The Guild for Human Services will inform the parents and guardians of enrolled students about the anti-bullying curricula being used. This notice will include information about the dynamics of bullying, cyber-bullying and online safety. The plan will be located on the website.

Prohibition against Bullying and Retaliation

The Guild for Human Services prohibits bullying, cyber bullying and retaliation as defined above.

Acts of bullying, which include cyber bullying are prohibited:

- (i) on Guild school property and all Guild for Human Services residential property and property immediately adjacent to school grounds, at Guild sponsored events and related activities whether on Guild

- grounds or off Guild grounds on Guild owned or leased vehicles or used by a school district; or through the use of technology or an electronic device owned, leased or used by a school district or 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 a school district or school, if the acts create a hostile environment at school, or materially and substantially disrupt the education process or the orderly operation of a school

Retaliation against a person, who reports bullying, provides information during an investigation of bullying is also prohibited.

VIII. Problem Resolution System:

Chapter 86 of the Acts of 2014 amended Section 37O 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 resolution 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: 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 or individuals can

Definitions

Bullying, as defined in M.G.L. c.71, 370, is the repeated use by one or more students 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 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

Aggressor is a student who engages in bullying, cyber-bullying or retaliation.

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.

Hostile environment 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, who provides information during an investigation of bullying or, who witnesses or has reliable information about bullying

Target is a student whom bullying, cyber-bullying, or retaliation has been perpetrated.

X. 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, religion, ancestry, national origin, sex, socioeconomic status, academic status, gender identity or expression, physical appearance, sexual orientation, or mental, physical, developmental, or sensory disability, or by association with a person who has or is perceived to have one or more of these characteristics. 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 or district 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, §§ 37H or 37H½, M.G.L. c. 71, §§41 and 42, M.G.L.c 76 § 5, or other applicable laws, or local school or district policies, or collective bargaining agreements, in response to violent, harmful, or disruptive behavior, regardless of whether the Plan covers the behavior.

