

Bullying Prevention and Intervention Plan

Seven Hills Pediatric Center

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#### A. Leadership

The School Director plays a critical role in the development and implementation of the Bullying Prevention and Intervention Plan (Plan) for Seven Hills Pediatric Center (SHPC). Leaders have a primary role in teaching students to be civil to one another and promoting understanding of and respect for diversity and differences.

1. Public Involvement in Developing the Plan-The members of the school community, including SPED teachers, teacher assistants, therapists, nurses, doctor, consulting psychologist, parents/guardians, community members and the school physician, were consulted in the development of the Plan. Involvement included meeting and talking with these stakeholders and utilizing their input. Biennially, parents/guardians receive a written letter regarding the plan and a public notice is posted at the school, soliciting input and noting the time period for public comment. The plan is reviewed and updated every two years.
2. Assessing needs and resources- The Plan is SHPC's blueprint for enhancing capacity to prevent and respond to issues of bullying within the context of other healthy school climate initiatives. The Director, in collaboration with key staff, has reviewed the adequacy of current programs, policies and procedures, past reports related to bullying and behavioral incidents, the access to resources, training programs and behavioral health services. There are currently no reports or documentation of any bullying or behavioral health issues within the school at this time, nor in the history of the school. This is due to the fact that based on admission criteria, all enrolled students must present with severe complex and chronic medical/developmental disabilities resulting in all levels of cognitive, motor, and language abilities being at or around the six (6) month level. Based on the functional level of SHPC students, there are no past reports on file of any bullying incidents. However, the plan recognizes that certain students may be more vulnerable to becoming a target of bullying or harassment based on actual or perceived differentiating characteristics, including race, color, religion, ancestry, national origin, sex, socioeconomic status, homelessness, academic status, gender identity or expression, physical appearance, pregnant or parenting status, sexual orientation, mental, physical, developmental or sensory disability, or by association with a person who had or is perceived to have 1 or more of these characteristics. Although student surveys are recommended to be completed by each student every four years beginning with the 2015-16 school year, the current student population enrolled at SHPC cannot participate in any survey, even with maximal accommodations, due to their complex medical, developmental, intellectual, and language impairments. In keeping with the annual reporting of bullying incident data, if the student needs/impairment remained consistent, the annual report would indicate no episodes of bullying occurred during the reporting period.
3. Planning and oversight- The Director will be responsible for receiving any reports on bullying, collecting and analyzing any school-wide data on bullying to assess the present problem and to measure improved outcomes, creating a system for recording and tracking incident reports, accessing information related to targets and aggressors, planning for ongoing professional development, planning supports that respond to the needs of targets and aggressors, choosing and implementing curriculum pertinent to bullying prevention, updating school policies and procedures as needed, drafting/amending any school related handbooks and parent information

materials and reviewing and updating the Plan annually or more frequently if needed. Updating handbooks and policies and codes of conduct to, among other things, make clear that bullying of students by school staff or other students will not be tolerated.

4. Developing priority statements-SHPC expects that all members of the school community will treat each other in a civil manner and with respect for differences. SHPC is committed to providing all students with a safe learning environment that is free from bullying and cyber-bullying. This commitment is an integral part of the program's 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. We understand that members of certain student groups, including but not limited to 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, may be more vulnerable to becoming targets of bullying, harassment or teasing. SHPC will take steps to create a safe, supportive environment for vulnerable populations in the school. The Plan is a comprehensive approach to addressing bullying and cyber-bullying, and SHPC is committed to working with any stakeholders (students, staff, parents/guardians, community members and local safety officers) to prevent any issues of violence. SHPC has separate discrimination/harassment policies pertaining to the protection of the civil rights of both students and staff. It is the school's responsibility to remediate any discrimination or harassment based on a person's membership in a legally protected category under local, state or federal law. SHPC will not tolerate any unlawful or disruptive behavior, including any form of bullying, cyber-bullying or retaliation, in our school buildings, grounds or other school related activities. We will promptly investigate all reports and complaints of bullying, cyber-bullying and retaliation, taking prompt action to end that behavior and restore the target's sense of safety. The Plan supports these priorities in all aspects of our school community, including curricula, instructional programs, staff development and parent/guardian involvement. The plan notes that, based on the student population and their intense medical, developmental, intellectual, and language impairments, there are no extracurricular activities at SHPC. The Plan is a comprehensive approach to addressing bullying and cyber bullying and SHPC is committed to working with students, staff, families, law enforcement agencies, and the community to prevent issues of violence. In collaboration with the above mentioned constituencies, the Plan is in place to prevent, intervene and respond to incidents of bullying, cyber bullying, and retaliation. The Director is responsible for the implementation and oversight of the Plan except when a reported bullying incident involves the Director or any Assistant Director as the alleged aggressor. In such a case, the Administrator/ Vice President of SHPC shall be responsible for investigating the report and other steps necessary to implement the Plan, including addressing the safety of the alleged target. If the Administrator/Vice President is the alleged aggressor, the Executive Vice President or the Presidents of Seven Hills Foundation shall be responsible for investigating the report and other steps necessary to implement the Plan, including addressing the safety of the target.

B. Training and Professional Development

1. Annual Staff Training on the Plan-Annual training will take place for school staff on the Plan. The annual training will include information regarding staff duties under the Plan, and an overview of the steps that the Director will follow upon receipt of a report of bullying or retaliation. Staff members hired after the start of the school year will be required to participate in school-based training during the school year in which they are hired, unless they can demonstrate participation in an acceptable and comparable program within the last two years. The development and implementation of appropriate curriculum geared toward prevention of bullying, cyber-bullying and retaliation will be reviewed. If there is a change in the unique needs of any of our enrolled students that would result in then having the ability to engage in bullying or retaliation, and an overview of the bullying prevention curricula to be offered to all students in all grades throughout the school. Ongoing professional development will be made available for staff, including but not limited to, educators, counselors, nurses, therapists, teacher assistants, doctors, social workers, and psychologists.
  
2. Ongoing Professional Development-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. The content of the training would include, but not necessarily be limited to, the following topics: a.) developmentally appropriate strategies to prevent bullying, b.) developmentally appropriate strategies for immediate, effective interventions to stop bullying incidents, c.) information regarding the complex interaction and power differential that can take place between and among an aggressor, target, and witnesses to the bullying, d.) 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, e.) information on the incidence and nature of cyber-bullying and f.) internet safety issues as they relate to cyber-bullying. Additional aspects of training would include: promoting and modeling the use of respectful language, fostering understanding of and respect for diversity/differences, building relationships and communicating with families, constructively managing classroom behaviors, using positive behavioral intervention strategies, applying constructive disciplinary practices, teaching students skills including positive communication, anger management and empathy for others, engaging students in school or classroom planning and decision-making, maintaining a safe and caring classroom for all students and engaging staff and those responsible for the implementation and oversight of the Plan to distinguish between acceptable managerial behaviors designed to correct misconduct, and instill accountability in the school setting. Professional development will also address ways to prevent and respond to bullying or retaliation for student with disabilities that must be considered when developing student' IEPs.
  
3. Written notice to staff – The school will provide all staff with an annual written notice of the Plan by publishing information about it, including sections related to staff duties and bullying of student by school staff, in the staff handbook and the code of conduct.

C. Access to Resources and Services

In order to promote a positive school climate, the underlying emotional needs of targets, student aggressors, families and others will be addressed through the provision of supports and services. The Plan describes the strategies for providing supports and services necessary to meet these needs. In order to enhance the school's capacity to prevent, intervene early, and respond effectively to bullying, available services should reflect an understanding of the dynamics of bullying and provide approaches to address the needs of targets and student aggressors. The Plan includes a strategy for providing counseling or referral to appropriate services for student aggressors, targets, and family members of those students. The available services reflect an understanding of the dynamics of bullying and provide approaches to address the needs of targets and aggressors.

1. Identifying Resources- SHPC has access to the supports of counselors, psychologists and psychiatrists through our affiliate program- Seven Hills Behavioral Health (SHBH), or other resources as indicated. The staff of this program can be utilized on an emergency and ongoing basis to provide both early interventions and intensive services as needed. With the support of the Behavioral Health staff, service plans can be developed, pertinent staff training can take place and safety planning team meetings can be convened. If additional services are required that are outside the scope or capacity of the Behavioral Health program, the guidance of their staff can be available to gain the support of additional agencies and/or local area resources.
2. Counseling and other Services- Counseling and other related services will be accessed, as needed, through the administration and staff of the SHBH program. SHBH staff have expertise in the area of behavioral health and are associated with community agencies that can provide the necessary linkages for student and family services in the area of developing safety plans for students who have been targets of bullying or retaliation. These services would be culturally and linguistically appropriate to those involved.
3. Students with Disabilities- All students enrolled in SHPC have complex medical and developmental disabilities. Based on these chronic conditions, they do not have the physical, cognitive or expressive abilities to participate in any type of bullying, cyber-bullying or retaliation behaviors. However, when developing their IEPs, team members will be aware of any needs related to their vulnerability in terms of bullying and will address these needs as required by M.G.L. c. 71B, § 3, as amended by Chapter 92 of the Acts of 2010.
4. Referral to Outside Services- In the unlikely event that a SHPC student would need to be referred for outside services, the Director would contact the Administrator of Seven Hills Behavioral Health Services. A plan would be developed, in consultation with the SHPC teacher and related staff, to enable the student and family to access the appropriate support services.

D. Academic and Non-Academic Activities

Based on the average cognitive age of all SHPC students being six (6) months or below, typically considered academic instruction is not consistent with their sensory-motor level of learning. Although students are assigned a grade level, all instruction is provided in a multi-sensory approach through experiences that are exclusively non-academic in nature. The curriculum is significantly adapted to accommodate their learning needs. If the student admission criteria

changes in the future, SHPC would provide age-appropriate instruction on bullying prevention to all student in the school, focusing on strategies for bullying prevention and social skills development.

1. Specific Bullying Prevention Approaches- Despite the learning, social skills and the absence of bullying behaviors from any SHPC students, the Director and teachers will ensure that the school environment is respectful of diversity and differences, and lesson plans include non-academic activities on issues related to prevention and intervention strategies surrounding bullying, cyber-bullying and retaliation. If the admission criteria changes, SHPC will empower student to take action by knowing what to do when they witness other students or school staff engaging in acts of bullying and cyber-bullying, including the underlying power imbalance. The school Plan will be reviewed by all members of the school community in the fall of each school year.
2. General Teaching Approaches that Support Bullying Prevention Efforts- SHPC will provide a school environment that is supportive of all students, staff, visitors and members of the community. Staff receive diversity and anti-harassment training annually, which will include discussions about the prevention and intervention related to bullying, cyber-bullying and retaliation. Students, based on their cognitive age, are unable to participate in any training related to learning skills, taking action or expressing themselves at a developmental level above six (6) months. There are no non-academic or extracurricular clubs or activities at SHPC.

E. Policies and Procedures for Reporting and Responding to Bullying and Retaliation

SHPC has created policies and procedures to respond promptly and effectively to any incidents of bullying or retaliation that may be reported. These policies will ensure that members of the school community- students, parents and school staff, know what will happen when incidents of bullying occur. They guide the action and response of staff, administration, students and families in the highly unlikely event that an episode of bullying or retaliation would occur based on the complex developmental, cognitive and medical needs of our students.

1. Reporting Bullying or Retaliation- A report of an episode of bullying or retaliation may be made or submitted by staff, students, parents/guardians or other SHPC community members. Such a report can be either oral or written. Oral reports made by or to a staff member must be scribed. The staff member is then required to immediately report to the Director or designee or to the Administrator/Vice President of SHPC when the principal or the assistant principal is the alleged aggressor or to the Executive Vice President or President of Seven Hills Foundation, any instance of bullying or retaliation the staff member becomes aware of or witnesses. Reports made by students, parents/guardians, or other individuals who are not school staff members, can be made anonymously. The school will make it known to the school community that there are a variety of reporting resources available, including Incident Reporting Forms, staff email addresses and confidential voicemail boxes. Although the use of an Incident Reporting Form is not mandated as a condition of making a report, these forms will be readily available to the SPHC staff, families and community members. The forms will be located in the following areas: the Main Office, the Nurse's Office, in the Parent Handbook and in each classroom. As parents/guardians request, the form will be translated in any and all languages or origin for students and families. Each school year, preferably in the Fall, the members of the SHPC

community will be provided with a written notice of the policies and procedures pertaining to the Plan, including a description of reporting practices and the name and contact information for the Director or designee. The written notice of the reporting policies will be shared with educators, administrator, school nurses, dietary staff, students, parents/guardians, teacher assistants and therapists. SHPC does not employ bus drivers, athletic coaches or advisors to extracurricular activities. The Plan is on the Seven Hills Foundation website. It can be viewed by clicking on Seven Hills Pediatric Center.

- a.) Reporting by Staff- A staff member will report immediately to the Director or designee or to the Administrator/ Vice President when the principal or the assistant principal is the alleged aggressor or to Executive Vice President or the President of Seven Hills Foundation, if the Administrator/Vice President is the alleged aggressor when he/she witnesses or becomes aware of conduct that may be bullying or retaliation. This reporting requirement does not limit the authority of the staff member to respond to a behavioral or disciplinary incident consistent with school policies and procedures for behavior management and discipline.
- b.) Reporting by Students, Parents/Guardians, and Others- SHPC expects students, parents/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, or Administrator/Vice President when the principal or assistant principal is the alleged aggressor. Such reports may be made anonymously, but no disciplinary action will be taken against an alleged aggressor solely on the basis of an anonymous report. Any reporter may request assistance from a staff member to complete a written report. Based on the cognitive, developmental and medical limitations of all SHPC students, it is not expected that they would have the physical, expressive or cognitive abilities to provide a report.

2. Responding to a report of Bullying or Retaliation- Allegations of Bullying by a Student

- a.) Safety-Before fully investigating the allegation 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, for all members of the school community, with particular focus on the alleged target. A particular staff member may be identified as a safe person for the alleged target and who would alter the alleged aggressors' access to the alleged target. The Director or designee will implement appropriate strategies for protecting from bullying or retaliation a student who 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. Additional responses to insure safety for all involved would include but not be limited to: pre-determining seating arrangements in the classroom for the target and/or aggressor in the classroom, insure that staff are available when either the target or the aggressor are in non-classroom areas of the school such as the outside campus or in the community for a school sponsored event or activity, identifying a staff member who will act as a "safe person" for the target and/or altering the aggressor's schedule and access to the target.

### Obligations to Notify Others

- 1.) Notice to Parents/Guardians- Upon determining that bullying or retaliation has occurred, the Director or designee will promptly notify the parents/guardians of the target and the student aggressor of this and of the procedures for responding to it. There may also be circumstances in which the Director or designee contacts parent/guardians prior to initiation of investigation. Notice is consistent with state regulations outlined at 603 CMR 49.00.
- 2.) Notice to Another School or District- If the reported incident involves students from a public school district(s), the SHPC Director or designee will promptly inform the principal(s) from the other school about the incident, so that each school may take appropriate action. Notification will occur by phone. All communications will be in accordance with state and federal privacy laws and regulations, and 603 CMR 49.00.
- 3.) 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 will notify the local law enforcement agency. Notice will be consistent with the requirement of 603 CMR 49.00 and locally established agreements with the local law enforcement agency. Also, if an incident occurs on school grounds and involves a former student under the age of 21 who is no longer enrolled at the school, the Director 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 student aggressor. Any reported incident would be highly unlikely to involve a former SHPC student under the age of 21, based on the fact that all past and current students having cognitive, developmental and medical limitations that would prevent them from being involved as a student aggressor in any incident of bullying or retaliation. In addition, all SHPC students are enrolled in the day program until the day before their 22<sup>nd</sup> birthday. No Student Resource Officer is available for the school. Therefore, all required and appropriate contact will be the Police Department in Groton MA.

### 3. Investigation

The Director or designee will promptly investigate any and 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 individuals involved. During the investigation, the Director or designee will, along other things, interview staff, witnesses, parents/guardians and others as necessary. Based on the cognitive, developmental and medical needs of SHPC students, they would not be able to participate in an interview. During the investigation, the Director or designee will remind the alleged student aggressor, target, and witnesses of the importance of the investigation, their obligation to be truthful and that retaliation against someone who reports bullying or provides information during a bullying investigation is strictly prohibited and will result in disciplinary action. To the extent practicable, and given his/her obligation to investigate and address the matter, the Director will maintain confidentiality during the investigative process. The Director will maintain a written record of the investigation.



Interviews may be conducted by the Director or designee, other staff as determined by the Director, and in consultation with the consulting school psychologist or staff from Seven Hills Behavioral Health Program. Investigation reports of bullying and retaliation will be consistent with school policies and procedures for investigations. If necessary, the Director or designee will consult with legal counsel regarding the investigatory process.

4. Determinations

The Director will make a determination based upon all of the facts and circumstances. If after the investigation, the report of bullying or retaliation is substantiated, the Director will take reasonably calculated steps to prevent recurrence and to ensure that the target is not restricted in participating in school or benefiting from school activities. The Director will: 1) determine what remedial action is required, if any, and 2) what responsive actions and/or disciplinary action will be necessary. Depending on the circumstances, the Director may choose to consult with the student's teacher(s), and/or school psychologist, and the target's and student aggressor's parents/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. The Director or designee will promptly notify the parents/guardians of the target and the student aggressor regarding the result of the investigation and if bullying or retaliation was found, what action is being taken to prevent further acts of bullying and retaliation. All notices to parents/guardians must comply with applicable state and federal privacy laws and regulations. Due to the legal requirements regarding the confidentiality of student records, the Director or designee cannot report specific information to the target's parents/guardians about the disciplinary action taken unless it involves a "stay away" order or other directives that the target must be aware of in order to report violations. The Director designee shall inform the parent/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

All SHPC students have severe cognitive, medical and developmental disabilities which result in students functioning at a sensorimotor level with little or no voluntary movement and no expressive language. They are unable to engage in any bullying or retaliation behaviors. In addition, having cognitive abilities that are, on average, at the 6 month level of development, make it inappropriate to anticipate that they would be able learn or expand their skills in the area of behaviors.

- a.) Teaching Appropriate Behavior Through Skills-Building- If the profile of students enrolled at SHPC were to change to the point of educating students with the potential to engage in bullying or retaliation, the Director or designee would ensure that SHPC would use a range of responses that balance the need for accountability with the need to teach appropriate behavior. Skills building approaches that the Director or designee would consider include: offering individualized skill-building sessions based on the school's developed anti-bullying curricula, consult with support services and staff/consultants,

provide relevant educational activities for individual students or groups of students, implement a range of academic/non-academic positive behavioral supports to help students understand pro-social ways to achieve their goals, meeting with parents/guardians to engage their support and to reinforce the anti-bullying and retaliation plan and social skills activities at home, adopting behavioral plans to include a focus on developing social skills and making a referral for evaluation as needed.

- b.) Taking Disciplinary Action- If the profile of students enrolled at SHPC were to change, and the Director or designee decides that disciplinary action is required after an investigation of a bullying related incident; the action would be determined on the basis of facts found by the Director or designee, 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 would be consistent with the Plan and with the school's code of conduct. Discipline procedures for students with disabilities are governed by the federal Individuals with Disabilities Education Improvement Act (IDEA), which should be adhered to along 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.
- c.) Promoting Safety for the Target and Others- The Director or designee will consider what adjustments, if any, may be needed in the school environment to enhance the target's sense of safety and that of others as well. The Director or designee will consider and implement any appropriate strategy that would enhance the safety of the school for all students; such as increasing staff supervision at specific times of the school day (transition times, lunch time outside time on campus or during specific types of activities), assigning a staff person to be a safety contact, providing support/counseling through school and/or a community resource, collaborate with target's family, and school and counseling staff in order to assess the target's needs on an ongoing basis. Within a reasonable period of time after the determination, remediation 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.

F. Responding to a Report of Bullying by School Staff- SHPC has zero tolerance for bullying, cyber-bullying or retaliation toward a student(s) by a school staff member including, but not limited to, an educator, administrator, cafeteria worker, custodian, housekeeper, teachers, psychologists, teach assistants, therapists, nurses, nurse practitioners or physicians. Although SHPC does not currently employ bus drivers, athletic coaches or advisors to extracurricular activities, if a future change in the SHPC student profile occurs and such positions were necessary, they would be included in the list of school members. Reports of any such alleged issues will be dealt with swiftly and in accordance to school policy, as well as local, state and federal regulations.

- 1. Safety- Before fully investigating the allegations of bullying or retaliation by a school staff member, the Director must take steps to assess the need to restore a sense of safety to the alleged target and to protect the alleged target for possible further incidents. Responses to

promote safety for the target may include but not be limited: insuring that the alleged aggressor/staff member does not come in contact with the target during the school day or at any other time, and/or consider putting the alleged aggressor on paid leave of absence during the course of the investigation. The Director will implement strategies for protecting any students who witnessed the bullying, has information about the bullying or can provide related information to the investigation

2. Obligations to notify Others-

- a. Notice to Parents-Upon determining that a school staff member bullied or retaliated upon a student, the parents/guardians of the student(s) will be immediately notified via telephone. Parent/guardians of any involved students will also be notified of who the alleged school staff member (aggressor) is thought to be. Director will inform the parents/guardians regarding the specific steps that have been taken and that will be taken, to insure the student(s) are safe at school.
- b. Notice to Another School or District- If the reported incident involved students from more than one school, the Director will promptly notify, by phone, the Principal(s) from the other school(s) of the incident, in order for each school to take appropriate action.
- c. Notification of Law Enforcement- At any point after receiving a report of bullying or retaliation, including after the investigation, if the Director has a reasonable basis to believe that criminal charges may be pursued against the alleged staff aggressor, the Director will notify the local law enforcement agency. If the incident occurs on school grounds and involves a previous staff member, the Director or designee will inform the local law enforcement agency and, if known, the local law enforcement agency of the former staff person. In making this determination, the Director or designee can consult with social workers, staff of Seven Hills Behavioral Health and/or SHPC legal counsel.

G. Investigation-The Director will promptly investigate all reports of bullying or retaliation allegedly caused by a school staff member and involving student(s). All available information known will be considered including the nature of the allegation(s), the ages of the student(s) and school staff member(s) involved. The Director will remind the alleged staff aggressor, target and witnesses of the investigation of their obligation to be truthful and that retaliation against someone that reports bullying or provides information during a bullying investigation is strictly prohibited and will result in disciplinary action. Interviews may be conducted by the Director or their designee, with support from social workers of behavioral health staff. To the extent possible, the Director or designee will maintain confidentiality during the investigation process. The Director will maintain a written record of the investigation. Procedures for investigating reports of bullying and retaliation will be consistent with school policies and procedures for investigations.

H. Determinations- The Director will make a determination based upon all of the facts and circumstances. If, after investigation, bullying or retaliation is substantiated against the school staff aggressor, the Director will take steps reasonably calculated to prevent the recurrence and to ensure that the target is not restricted in participating in school or in benefiting from school

activities. The Director will determine: 1) what remedial action is required, and 2) what responsive actions and/or disciplinary action is necessary. If a school staff member is found, as the result of an investigation, to having bullied or retaliated upon a student(s), that staff member will be subject to progressive disciplinary actions starting with written counseling and up to and including being involuntarily terminated. The Director will consult with the Vice President of Human Resources for Seven Hills Foundation, in addition to contacting legal counsel regarding the appropriate type of disciplinary actions to put in place.

I. Responses to Bullying-

1. Teaching Appropriate Behavior Through Skills-Building-Upon the Director or designee determining that bullying or retaliation has occurred through a school staff member to a student(s), the appropriate form of discipline will be handed out to any staff member(s), shown by the investigation, to be involved in the incident. Additional training activities would be implemented to enable staff to fulfill their responsibility for maintaining a bully-free environment in the school. Any and all members of the school staff, including but not limited to educators, administrators, school nurses, therapists, dietary staff, custodians, teacher assistants, housekeeping, social worker, psychologist, nurse practitioners and physicians. At this time, SHPC does not employ bus drivers, athletic coaches or advisors to extracurricular activities. If such positions were added to the school staff, they would be included in the ongoing training as well. The Director or designee would share with parents/guardians all of the efforts in training and professional development that would be provided to all school staff to eliminate the likelihood of future school staff bullying a student(s).
2. Taking Disciplinary Action- If the Director decides that disciplinary action is appropriate, the disciplinary action will be determined on the basis of the facts found by the Director, including the nature of the staff's conduct, required counseling for the school staff member involved in the incident and the level of egregiousness of the actions taken against a student(s). The disciplinary action taken will be consistent with the progressive disciplinary plan set forth in the SHPC Employee Handbook and the DESE regulated Bullying Prevention and Intervention Plan.
3. Promoting Safety for the Target and Others-The Director will consider what adjustments, if any, are needed in the school environment to enhance the target's safety and that of others as well. The school staff found to be the aggressor can change their work location to another section of the building where he/she would be unlikely to be involved with the student(s), if the school staff member is the involved student(s) direct instructional teacher, for example, that teacher would transfer to another classroom where student contact would become minimal or non-existent, and the target could be provided with a safe person to accompany them during transition times in the school building or when on school grounds. And finally, the disciplinary plan agreed upon by the Director and Human Resources would greatly increase the safety of the target if the school staff aggressor was transferred out of the school or termination may be warranted.

1. Collaboration with Families

SHPC strongly supports the importance of engaging and collaborating with student families in all areas and issues related to their child's educational experience. If the profile of students enrolled at SHPC changes to include students with the cognitive, developmental and language skills that would be needed to have the capacity to participate in bullying and retaliation behavior, the Director or designee would implement strategies and collaborations to engage with student's families regarding our capacity to prevent and respond to episodes of bullying and retaliation. These strategies would include: informing families about the resources available to them to prevent and respond to bullying-type behaviors; implementing ongoing and effective methods of collaboration/communication with families through methods such as emails, phone calls, parent meetings, and parent trainings. The topics covered through the various communications would include: how to reinforce key elements of the Plan within the home, explanations and review of situations relating to the various dynamics surrounding bullying, and how to prevent and respond to online safety and cyber-bullying. Parents will be notified annually about all student-related parts of the Plan, in the language(s) that they request. The Director or designee must take into effect the make-up of the student and family population in terms of age, climate, socio-economic factors, linguistic and cultural issues.

1. Parent Education and Resources

If the student profile of any student(s) enrolled at SHPC changes to include students that have the cognitive, developmental, motor and language skills to potentially engage in bullying-type behaviors, SHPC will offer educational programs for parents/guardians that are focused on the parental components of the anti-bullying curricula and any social competency curricula used by the school. The programs will be offered in collaboration with existing parents groups and will be presented through a multi-media approach, thereby having a greater opportunity to use various learning approaches to educate families and provide them with resources.

2. Notification Requirements

Each year SHPC will inform parents/guardians of enrolled student about the Plan. The notice to parents/guardians will include information about the dynamics of bullying, including cyber bullying, online safety, student-related sections of the plan and online safety. The notices will be available in hardcopy, and can be electronically provided via email and will be translated into language(s) requested by the families.

2. Prohibition Against Bullying and Retaliation

The severe cognitive, developmental and medical needs of all SHPC students make it essentially impossible for them to participate in any acts of bullying, cyber bullying and retaliation against a person who reports or witnesses such incidents during an investigation. However, it is the expectation of the school and the school community that all acts related to such behaviors are prohibited. This prohibition applies to any and all actions that take place on school grounds, and during community field trips on a handicapped van owned or leased by the school. SHPC students are unable to use a standard school bus or any technology related equipment

(computer, cell phone, etc.), making it unlikely that bullying behaviors could occur through the use of an electronic device. Retaliation against a person who reports bullying, provides information during an investigation or witnesses an incident, is also prohibited. Protections for such reporters, witnesses and interviewees will be provided. Examples of such protections would be: increasing staff coverage during classes/activities, providing a safe staff person to be assigned, and increasing surveillance during school activities.

### 3. Definitions

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

Bullying - the repeated use by one or more students or school staff of a written, verbal, or electronic expression or a physical act or gesture or any combination thereof, directed at a target that:

1. causes physical or emotional harm to the target or damage to the target's property
2. places the target in reasonable fear of harm to himself or herself or of damage to his or her property
3. creates a hostile environment at school for the target
4. infringes on the rights of the target at school, or
5. materially and substantially disrupts the education process or the orderly operation of a school.

Cyber bullying- 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- 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- includes, but is not limited to, clerical support, educators, administrators, counselors, school nurses, custodians, housekeeping, van drivers, related service/support staff (physical therapists, occupational therapists, speech and language pathologists), medical staff(school nurses, nurse practitioner, physician), dietician, consulting psychologist, social worker and teacher assistants/certified nursing assistants. (Based on the severe cognitive, developmental and medical needs of SHPC students, there are no coaches, club advisors, bus drivers, or cafeteria workers on staff.)

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

#### 4. Relationship to Other Laws

Consistent with state and federal laws, along with the school's admission policy, no student will be discriminated against in the admission process to SHPC's private Special Education Day School. Admission and access to all school services is based on the student's learning needs as outlined in their IEP, the recommendation of the team and the ability of the school program to meet the unique cognitive, developmental and medical needs of all students. SHPC recognizes that the Plan does not prevent the 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 SHPC policies. In addition, the school recognizes that based on various state and federal regulations that may be related to bullying, cyber bullying and retaliation, the Director or designee may find it necessary to immediately notify local law enforcement. Although the current student profile only includes students who's cognitive, developmental and medical limitations would prevent them from engaging in any bullying-related type of behavior, SHPC realizes that if the needs of students were to change, the authority of the school would not be limited by the Plan in taking disciplinary action in response to violent, harmful or disruptive behavior.

## ADDENDUM

All students have surgically placed tubes that provide their nutrition due to the presence of severe oral-motor dysfunction. All students present with some degree of Cortical Visual Impairment and may have significant loss of hearing related to auditory processing dysfunction. They cannot access the internet. No students are able to use any electronic devices such as cell phones, or computers. The Department approved curricula is based on the MA Curriculum Frameworks but requires significant accommodations to all presentation of all lessons/activities through a multi-sensory approach to learning

It is anticipated that our current and future students will continue to present with the same constellation of physical, medical and learning needs that would make them unable to participate in any form of bullying, cyber-bullying or retaliation. However, our community has complied with the request of the Department to develop a Plan for bullying prevention and intervention

Seven Hills Pediatric Center-Private Special Education Day School/Pediatric Nursing Home



September 8, 2014

Dear \_\_\_\_\_,

The Massachusetts Department of Elementary and Secondary Education is requiring all schools in the Commonwealth to develop a Bullying Prevention & Intervention Plan. The Academy at Seven Hills Pediatric Center must comply with this requirement. As you know, the unique and complex disabilities of our students make it extremely unlikely that bullying behaviors would ever be present in our school. However, we will be forwarding a general plan to the Department that will cover our responsibility for submitting documentation on this topic. The Plan is available for your review on our website or in the Main Office of the school.

Please contact me if you have any questions regarding this matter.

Sincerely,

Mary Cassidy Conway

Director of Education

*(Sample of parent/guardian letter)*

SEVEN HILLS PEDIATRIC CENTER  
EDUCATION DEPARTMENT

EMERGENCY EVACUATION TRAININGS & DRILLS

Seven Hills Pediatric Center provides all employees with training relative to any and all procedures related to emergency situations. This includes trainings in a wide range of potential emergency situations, fire alarm activation, and use of fire extinguishers. The frequency of the trainings is based on current local, state and federal guidelines. Successful completion of these trainings is documented for all staff and incorporated into annual performance evaluations. In addition, a written Disaster Plan directs all actions in the event of a local or regional disaster.

I. FIRE SAFETY:

1. All new employees are required to attend emergency training for evacuation, fire alarm and extinguisher use during the first three days of their orientation.
2. All staff must successfully complete a post-test for each portion of the emergency training program.
3. Mandated trainings are offered on a schedule that allows all staff to fulfill their yearly mandatory attendance requirement: Fire extinguisher training – once per year over multiple days, Fire Alarm and overall Fire Safety/Evacuation training – twelve (12) times per year and Evacuation Drills – once per shift per quarter.
4. The Facilities Technician and Staff Development Coordinator work collaboratively with the Director of Education and Therapy to ensure that all mandated and appropriate training occurs in a timely fashion. They are also responsible for reviewing the policy and procedures governing emergency practices on a yearly basis and updating the policy and/or procedures as needed.
5. Fire drills are conducted within the school on a regular basis, with a minimum of twelve (12) drills annually.
6. The Facilities Technician and Staff Development Coordinator plan, conduct, and are official witnesses for each drill. Additional supervision may be in attendance as well, depending on the specific location of the drill.
7. The specific participants in the drill can be determined by review of staff schedules on the day of the drill in the area where the drill occurred.
8. Additional staff training will be provided if the emergency responses during the drill were not satisfactory, as determined by the Facilities Technician and Staff Development Coordinator.
9. Logs of drills are attached. The specific participants can be determined by review of staff schedules on the day of the drill who were assigned to the particular area. Witnesses for the drills typically include the Staff Development Coordinator and the Facilities Technician. Supervisors from various departments may also be in attendance depending on the location of the drill.

## II. FIRST AID:

Staff are trained in the administration of basic first aid at orientation and annually thereafter. Students in need of first aid are referred to the school nurse. If the nurse is not available, staff should administer basic first aid until the nurse or other assistance is available.

## III. RUN AWAY STUDENTS:

In the event that a student elopes from the program:

- Staff immediately notifies Program Director
- Program Director implements Runaway Student Policy (see Policy #26)

## IV. FLOOD:

In the case of a flood due to water line breakage, sewer back-up, or other reasons responsible for the flooding of the building, staff and students will relocate. Follow relocation procedures.

- The Program Manager will be immediately notified. The facilities staff will then be paged, along with the notification of the Executive Director
- Notify Executive Director, parents and respective school districts

## V. SEVERE WEATHER:

In case of severe weather that disables the school, staff and students will relocate. Follow relocation procedures.

- Facilities staff will be paged to respond to the situation
- Notify Executive Director, parents and respective school districts

If weather conditions prohibit relocation, the appropriate elements of the COOP plan for SHPC will be implemented.

## VI. ELECTRICAL OUTAGE:

In the case of an electrical outage, the on-line generator will immediately take over. If the generator does not work, staff and students will be relocated. Follow relocation procedures

- Facilities staff will be paged to respond to the situation
- Notify Executive Director, parents and respective school districts

## VII. BOMB THREAT:

In the case of a bomb threat, staff and students will relocate. Follow relocation procedures.

- The Police and Fire Department will be notified immediately by the Program Director, in conjunction with the Executive Director
- Notify parents and respective school districts

## VIII. INTRUDER:

In the case that an intruder might circumvent the security system and enter the building, a page will be given to indicate intruder: "Code I". All entrances to SHPC require a coded badge in order to gain access into the school, thereby reducing the risk of an intruder.

- Staff will immediately shut their classroom doors and shades. The teacher or designee will take a head count and place staff and students away from the doors.
- The Director or designee will immediately phone the Police.
- The Director or designee will check the bathrooms and other rooms that might be occupied.

- If there are staff and students on the school grounds, the designated staff will notify them by cell phone or walkie-talkie. Staff and students will immediately go to the Annex Building.
- In the case of a suspected intruder outside of the building, a page will be given to indicate intruder outside: "Code O"
- The Director or designee will immediately phone the police.
- Staff will shut their classroom doors and shades, and place all staff and students away from the door.
- If there are students on the playground, the designated staff will notify them by cell phone or walkie-talkie. They will immediately go to the Annex Building.

#### IX. RELOCATION PROCEDURES:

The Director or a designee will coordinate all staff and students as to the specific relocation site as follows:

- Students will be relocated to Seven Hills Academy at Devens
- Notify Program Director at Devens
- Notify Executive Director, parents and respective school districts

#### X. INCIDENT REPORTING:

Consistent with expectations and other policies and procedures, all reporting of incidents will be consistent with requirements related to Immediate Notification. The Department of Elementary and Secondary Education (DESE) Form 2 will be used as indicated. (See Policy #39).