



Cardinal Cushing Centers

All ages. All abilities. All together.

Cardinal Cushing Centers / St. Coletta School Bullying Prevention and Intervention Plan

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I. OVERVIEW OF PLAN

Enriched by Franciscan values and traditions, Cardinal Cushing Centers/St. Coletta School provides safe, nurturing and supportive programs and environments to children and young adults with cognitive, physical and emotional disabilities.

The Bullying Prevention Plan (“Plan”) is a comprehensive approach to addressing bullying, cyber-bullying, and retaliation and the Cardinal Cushing Centers/St. Coletta School is 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 Vice President for Student Programs and Services, Program Directors, or their designees are responsible for the implementation and oversight of the Plan.

We recognize 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. Cardinal Cushing Centers has identified specific steps it will take to create a safe, supportive environment for vulnerable populations in the school community and provide all students and staff members with the skills, knowledge, and strategies to prevent or respond to bullying, harassment or teasing.

Cardinal Cushing Centers/St. Coletta School observes a zero-tolerance policy with regards to bullying. We will not tolerate any unlawful or disruptive behavior, including any form of bullying, cyber-bullying or retaliation in our school buildings, on school grounds, in school-related activities or our residential units. 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 and residential community including curricula, instructional programs, staff development, and extracurricular activities and parent or guardian involvement.

PROHIBITED BEHAVIOR

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

- 1) 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, on a school van or other vehicle owned, leased, or used by the school; or through the use of technology or an electronic device owned, leased, or used by the school.
- 2) 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.

- 3) 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.

II. LEADERSHIP / ROLES

Public Involvement

Cardinal Cushing Centers/St. Coletta School's Bullying Prevention and Intervention Plan has been designed after soliciting input from the greater school community, including the students, parents and staff. The school utilized current opinions on bullying issues, as well as the results of a bullying survey conducted by the bullying committee in 2010.

Needs Assessment

The school's office of the Vice President for Student Programs and Services and the Anti-Bullying Committee will review this plan at least annually to ensure that the plan's tenets are based on current data and that its resources and strategies are current and effective. All community stakeholders will be consulted in the revision of this plan but the Vice President for Student Programs and Services, Program Directors, or their designees will schedule it as an annual agenda item and will advise the Board of Directors (President/CEO).

Planning and Oversight

The Vice President for Student Programs and Services, Program Directors, or their designees are responsible for:

- 1) Planning for the ongoing professional development that is required by law in consultation with the Anti-Bullying Committee
- 2) Leading the parent or family engagement efforts and drafting parent information materials
- 3) Reviewing and updating the plan each year
- 4) Recommending policies and protocols to the Board of Directors and designating key staff to be in charge of implementation of them
- 5) Making the determination as to whether an investigated allegation of bullying or retaliation warrants the involvement of law enforcement

The Anti-Bullying Committee/Chair will be responsible for:

- 1) Receiving reports on bullying
- 2) Collecting and analyzing building and/or school-wide data on bullying to assess the present problem and to measure improved outcomes
- 3) Creating a process for recording and tracking incident reports and for accessing information related to targets and aggressors
- 4) Amending student handbooks
- 5) Creating a support system that respond to the needs of targets and aggressors
- 6) Choosing and implementing the curricula that the school will use

- 7) Responding to agency wide email account on bullying questions and answers
- 8) Conducting an annual bullying survey with students
- 9) Researching “best practice”
 - Maintaining a resource library
 - Changes in law

III. DEFINITIONS

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

- Causes physical or emotional harm to the target or damage of the target’s property;
- Places the target in reasonable fear of harm to him/herself, or of damage to his/her property;
- Creates a hostile environment at school for the target;
- Infringes on the rights of the target at school; or
- Materially and substantially disrupts the education process or the orderly operation of the school

Cyber-bullying means bullying through the use of technology or any electronic communication, which shall include, but shall not be limited to, any transfer of signs, signals, writing, images, sounds, data or intelligence of any nature transmitted in whole or in part by a:

- Wire
- Radio
- Electromagnetic
- Photo-electronic or photo-optical system, including, but not limited to, electronic mail, internet communications, instant messages, text messages, internet and social media postings or facsimile communications. (See M.G.L. c. 71, § 370)

Cyber-bullying shall also include the creation of a web page or blog in which the creator assumes the identity of another person or knowingly impersonates another person as author of posted content or messages if the creation or impersonation creates any of the conditions enumerated in the definition of bullying.

Cyber-bullying shall also include the distribution by electronic means of a communication to more than one person or the posting of material on an electronic medium that may be accessed by one or more persons, if the distribution of posting creates any of the conditions enumerated in the definition of bullying.

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

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

Hostile Environment, as defined in (See M.G.L. c. 71, § 370) is a situation in which bullying causes the school/residential environment to be permeated with intimidation, ridicule, or insult that is sufficiently severe or pervasive to alter the conditions of a student's education or a staff person's work environment.

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

Staff includes, but is not limited to, educators, administrators, counselors, school nurses, residential life skills workers, cafeteria workers, custodians, bus drivers, athletic coaches, advisors to extracurricular activities, support staff or paraprofessionals.

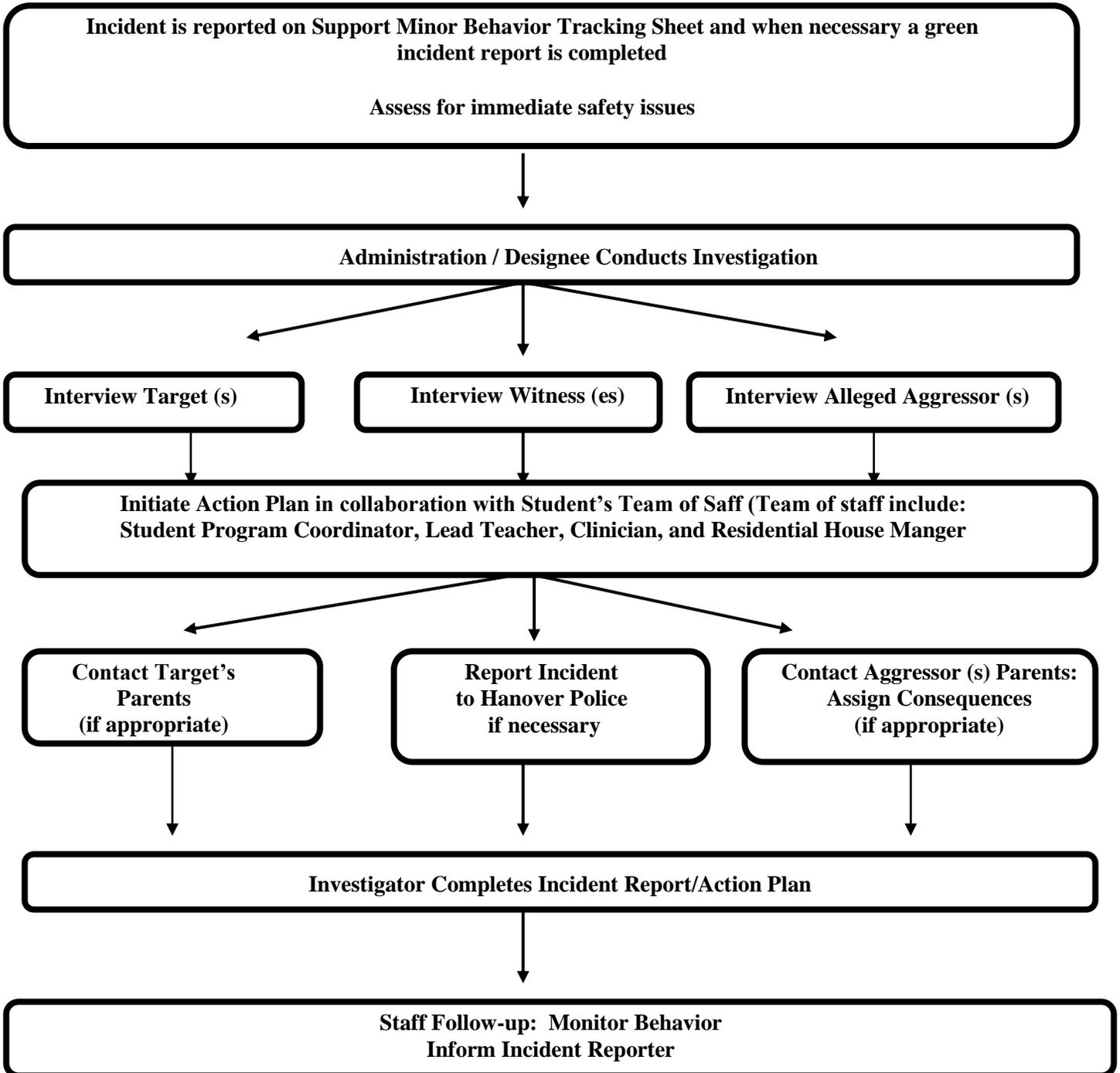
Safe-person is a clinician or designated staff member the target would access as needed.

IV. TRAINING AND PROFESSIONAL DEVELOPMENT

Annual Staff Training on the Plan: Annual training for all school and residential staff on the Plan will include staff duties under the Plan, an overview of the steps that the Vice President for Student Programs and Services, Program Directors, or their designees or Anti-Bullying Committee will follow upon receipt of a report of bullying or retaliation, and an overview of the bullying prevention curricula. Each year all mandated reporters will receive training to increase their understanding of the complexities and issues related to bullying, cyber-bullying, and retaliation.

Page six provides an overview of Cardinal Cushing Centers /St. Coletta Schools procedure for how to take action if bullying is witnessed. This is in compliance with the M.G.L. c. 71 § 370.

PROCESS FOR RESPONDING TO A REPORT OF BULLYING FLOW CHART



Ongoing Professional Development: As required by M.G.L. c. 71, § 370, the content of school wide professional development will be informed by research and will include information on:

- 1) Developmentally (or age) appropriate strategies to prevent bullying
- 2) Developmentally (or age) appropriate strategies for immediate, effective interventions to stop bullying incidents
- 3) Information regarding the complex interaction and power differential that can take place between and among an aggressor, target, and witnesses to the bullying
- 4) 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
- 5) Information on the incidence and nature of cyber-bullying
- 6) 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, and this must be considered when developing students' Individualized Education Programs (IEPs). This will include a particular focus on the needs of students with intellectual disabilities.

Written Notice to Staff: The school will provide all staff with an annual written notice of the Plan in the employee handbook. Additionally, the plan shall be posted on the Cardinal Cushing Centers/St. Coletta Schools website.

V. ACCESS TO RESOURCES AND SERVICES

The Cardinal Cushing Centers/St. Coletta Schools provides several early intervention strategies. The Cardinal Cushing Centers/St. Coletta Schools is a Chapter 766 approved special needs program providing educational, vocational, residential and clinical services to children, adolescents and young adults (through age 22) with Cognitive Impairment and associated developmental disabilities. Services at the Hanover campus are available on a 24 hour/ 365 day basis. Cardinal Cushing Centers/St. Coletta Schools offers a therapeutic behavior management program designed to teach students pro-social skills with additional support available during episodes of behavioral and/or emotional dysregulation. The current services provided through the therapeutic program aim to provide students a safe educational and residential environment.

The resources that are currently available within all programs at the Cardinal Cushing Centers/St. Coletta Schools include:

- Individual and group clinical services provided by licensed social workers and mental health counselors
- Case Management provided by our Student Program Coordinators providing outreach to students, staff, parents, and collaborating school districts.
- Behavior educator and Behaviorist on a referral basis
- Occupational, Physical, and Speech Therapy

- Direct instruction and implementation special education in the classroom
- An Employee Assistance Program for staff

In addition, the Cardinal Cushing Centers/St. Coletta School through all areas of its program will continue to educate and empower students to create a positive and safe learning environment. There are numerous activities throughout the year to increase school spirit among students, staff, and parents. The more specific current intervention strategies in collaboration with students include:

- Creating a “safe environment school-wide pledge”
- Continuing our student council program
- Organizing and monitoring a peer leader program emphasizing anti-bullying efforts as a major responsibility for the peer leaders.
- Hosting an annual Respect Week
- Implementing a positive-quote campaign
- Encouraging students to practice “Random Acts of Kindness” to understand the impact of empathy and compassion in relationship.

Current Staffing and Programs That Support the Creation of Positive School Environment

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Ginger Sullivan
Associate Vice President for Residential Programming

(781) 829-4676

Katy Hamilton
ACE Program Director
(781) 829-4603

Bridget Lally, LCSW
Clinician/Chair of Anti-Bullying Committee
Phone: (781) 829-4601

Amy Purkis
Director of Health and Behavioral Services
Phone: (781) 829-1284

Cardinal Cushing Centers Adult Services
405 Washington Street
Hanover, MA 02339

Jean Rogers
Vice President of Community & Adult Services
Cardinal Cushing Centers
Phone: (781) 829-1225

Aindrea Benduzek
Director of Residential for Adult Services
Phone: (781) 829-1240

**South Shore Industries &
Life Opportunities Unlimited**
Angela Gokey
Director of Day Services
85 Washington Street
Braintree, MA 02184

Hanover Police Department
129 Rockland Street
Hanover, MA 02339
Phone: (781) 826-3231
Emergency: 911

Braintree Police Department
282 Union Street
Braintree, MA 02184
Phone: (781) 843-1212
Emergency: 911

Additional Resources:

In researching additional resources and choosing evidence based programs, we are investigating programs that address bullying and cyber-bullying prevention with a component pertaining to parent education and involvement. In addition we are investigating if it is age appropriate, pertains to our population, has been evaluated through research, and has demonstrated to have a positive impact.

Massachusetts Aggression Reduction Center (MARC), Resources and Research material, (marc@bridgew.edu)

“Stop Bullying Now – Take a Stand, Lend a Hand”, Health Resource and Services Administration

“The Bullying Free Classroom”, Allan L. Beane

James Stanfield, Ed. D, “Be Cool” series – Criticism, Teasing, Bullying, Anger/Other, Anger/Self. Dr. Stanfield is a Specialist in Special Education and School to Life Transition, James Stanfield Company specializes in special educational learning tools and materials

VI. ACADEMIC AND NON-ACADEMIC ACTIVITIES

Initiatives will teach students about the student-related sections of the Bullying Prevention and Intervention Plan. The school will review the bullying plan each September.

A. Specific Bullying Prevention Approaches: Bullying prevention curricula will be informed by current research which, among other things, emphasizes the following approaches:

- 1) Empowering individuals to take action by knowing what to do when they witness others engaged in acts of bullying or retaliation, including seeking adult assistance
- 2) Helping individuals understand the dynamics of bullying and cyber-bullying, including the underlying power of imbalance
- 3) Emphasizing cyber-safety, including safe and appropriate use of electronic communication technologies
- 4) Enhancing individuals’ skills for engaging in healthy relationships and respectful communications
- 5) Engaging individuals in a safe, supportive school environment that is respectful of diversity and difference
- 6) Informing individuals that bullying will not be tolerated

B. General Teaching Approaches That Support Bullying Prevention

Efforts: The following approaches are integral to establishing a safe and supportive school and residential environment. These underscore the importance of our bullying intervention and prevention initiatives:

- 1) Setting clear expectations for individuals and establishing school, classroom and residential routines
- 2) Creating safe school, classroom and residential environments for all individuals, including for s individuals with disabilities, lesbian, gay, bisexual, transgender students, and minority individuals.
- 3) Using appropriate and positive responses and reinforcement, even when individuals require discipline [SafetyCare and Positive Behavioral Intervention Supports(PBIS)].
- 4) Using PBIS and SafetyCare, interventions that positively reinforces all students for displaying positive behavior in three areas, Caring for Themselves, Caring for Others, and Caring for the Environment, by acknowledging their success and reinforcing them with points, prizes, and privileges.
- 5) Encouraging adults to develop positive appropriate relationships with students
- 6) Modeling, teaching, and rewarding pro-social, healthy, and respectful behaviors
- 7) 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
- 8) Using the internet safely
- 9) Supporting students' interests and participation in non-academic and extracurricular activities, particularly in their areas of strength

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

Cardinal Cushing Centers/St. Coletta Day School has the following plan in place including policies and procedures for ensuring that members of the school/residential community – students, parents and staff – know how Cardinal Cushing Centers/St. Coletta School will respond to incidents of bullying.

Cardinal Cushing Centers/St. Coletta School's Bullying Prevention and Intervention Plan details procedures for staff reporting of incidents, processes for communicating to students and families how reports can be made (including anonymous reports), and the procedures to be followed once a report has been made.

A. Reporting Bullying or Retaliation: Reports of bullying or retaliation may be made by staff, students, parents, guardians, or others and may be oral or written. Reports will be transcribed by staff of Cardinal Cushing Centers/St. Coletta via a behavioral intervention reporting form. All Cardinal Cushing Centers/St. Coletta employees are mandated to report immediately to administration, verbally in addition to the written report, 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 personnel, may be made anonymously. Parents and guardians who wish to report an incident of bullying should contact their Student Program Coordinator or the Chair of the Anti-Bullying Committee.

At the beginning of each school year, Cardinal Cushing Centers/St. Coletta School will provide the school community, including administrators, staff, students, parents, and guardians, with 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 Student Program Coordinator, Vice President for Student Programs and Services, Program Directors, and the Anti-Bullying Committee Chair will be incorporated in the student and staff handbooks at www.coletta.org.

1) Reporting by Staff

An employee will verbally report immediately to administration and via a minor behavior tracking form or behavior intervention report depending on the severity, when he/she witnesses or becomes aware of conduct that may be bullying or retaliation. The requirement to report to administration shall not limit the employee from responding to the incident consistent with the policies and procedures for behavior management and discipline.

2) Reporting by Students, Parents, Guardians, and Others

Cardinal Cushing Centers/St. Coletta Day School expects students, parents, guardians, and others who witness or become aware of an instance of bullying or retaliation involving a student to report the incident to the student's Student Program Coordinator, the Vice President for Student Programs and Services, Program Directors, or their designees, or the Anti-Bullying Committee Chair. 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 will be provided practical, safe and appropriate ways to report and discuss an incident of bullying with an employee, or with the Vice President for Student Programs and Services, Program Directors, or their designees, or the Anti-Bullying Committee members.

B. Responding to a Report of Bullying or Retaliation

1) Safety

Before fully investigating the allegations of bullying or retaliation, the Vice President for Student Programs and Services, Program Directors, or their designees or the Anti-Bullying Committee will take steps to assess the need, and take steps to restore a sense of public 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-determined seating arrangements for the target and/or aggressor in the classroom, pre-determined residential placements for the target and/or aggressor in the residential units, at lunch or on the bus; identifying a clinician who will act as a "safe

person” for the target; and may include altering the aggressor’s schedule and access to the target.

The student’s team 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 Parents or Guardians

- a. Notice to parents or guardians: Upon the schools determination that bullying has occurred; the Vice President for Student Programs and Services, Educational Director, Vocational Director, or Residential Director will promptly notify the parents or guardians of the target (if a student) and the aggressor of the findings and of the procedures for responding to it. Cardinal Cushing Centers/St. Coletta may contact parents or guardians prior to or as part of an investigation.
- b. Notice to another school or district: If the reported incident involves student(s) or staff from another school, Cardinal Cushing Centers/St. Coletta 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 Vice President for Student Programs and Services, a Program Director, or their designee have a reasonable basis to believe that criminal charges may be pursued against the aggressor, the Vice President for Student Programs and Services, a Program Director, or their 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 an incident occurs on school grounds and involves a former student under the age of 21 or visitors or volunteers who are not enrolled in the school, the Vice President for Student Programs and Services, a Program Director, or their 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.

In making this determination the Vice President for Student Programs and Services, a Program Director, or their designee, consistent with Cardinal Cushing Centers/St. Coletta School Bullying Prevention and Intervention Plan, will consult with other individuals deemed appropriate.

C. Investigation

All investigations shall be thorough and complete and shall include, but not be limited to:

- a. Taking statements from target(s), bystander(s) and aggressor(s);
- b. Careful examination of facts;
- c. Support for the target(s) and aggressor(s); and
- d. Determination if the alleged act occurred, and if determined to have occurred, whether it constitutes a violation of this policy.

The Vice President for Student Programs and Services, the Program Directors, or their designees shall maintain all reports and records of the investigation on file.

Cardinal Cushing Centers/St. Coletta School will investigate promptly all reports of bullying or retaliation and, and in doing so, will consider all available information known, including the nature of the allegation(s) and the ages of the students or others involved.

During the investigation the Vice President for Student Programs and Services, the Program Directors, or their designees or the Anti-Bullying Committee will, among other things, interview students, staff, witnesses, parents, guardians, and others as necessary. The Vice President for Student Programs and Services, the Program Directors, or their designees, or the Anti-Bullying Committee 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 Vice President for Student Programs and Services, Program Directors, or their designees or the Anti-Bullying Committee in consultation with a clinician as appropriate. To the extent practical, and given his/her obligation to investigate and address the matter, the Vice President for Student Programs and Services, the Program Directors, or their designees or the Anti-Bullying Committee will maintain a written record of the investigation.

Procedures for investigating reports of bullying and retaliation will be consistent with school practices for investigations. If necessary the Vice President for Student Programs and Services, Program Directors, or their designees, will consult with legal counsel about the investigation.

D. Determinations

The Vice President for Student Programs and Services, Program Directors, or their designees or the Anti-Bullying Committee will make a determination based upon all the facts and circumstances. If, after investigation, bullying or retaliation is substantiated, the Vice President for Student Programs and Services, the Program Directors, or their designees, or the Anti-Bullying Committee 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/residential activities. The Vice President for Student Programs and Services, Program Directors, or their designees or Anti-Bully Committee will: 1) determine what remedial action is required, if any, and 2) determine what responsive actions and/or disciplinary action is necessary.

Depending upon the circumstances, the Vice President for Student Programs and Services, Program Directors, their designees or the Anti-Bullying Committee may choose to consult with the target's or aggressor's Team, 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.

The Student Program Coordinator will promptly notify the parents or guardians of the target and the aggressor (if students) regarding 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 state and federal privacy laws and regulations. Due to legal requirements regarding confidentiality of student records the Vice President for Student Programs and Services, Program Directors, their designees or the Anti-Bullying Committee cannot report specific information to the target's parents 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.

E. Responses to Bullying

Cardinal Cushing Centers/St. Coletta Day School Bullying Prevention and Intervention Plan details below the strategies for building students' skills, and other individualized interventions that the school may take in response to remediate or prevent further bullying and retaliation:

1) Teaching Appropriate Behavior Through Skills-Building

Upon the Vice President for Student Programs and Services, Program Directors, their designees or the Anti-Bullying Committee determining that bullying or retaliation has occurred, Cardinal Cushing Centers/St. Coletta School will utilize a range of responses that balance the need for accountability with the need to teach appropriate behavior. Skill-building approaches that the Vice

President for Student Programs and Services, Program Directors, their designees or the Anti-Bullying Committee may consider include:

- a. Offering individualized or small group skill building sessions based upon the school's anti-bullying curricula
- b. Providing relevant educational activities for students, in consultation with a clinician and other appropriate school personnel
- c. Implementing academic and non-academic positive behavioral supports to help students understand pro-social ways to achieve their goals
- d. Meeting with parents or guardians to engage parental support and to reinforce the bullying curricula and social skills building activities at home
- e. Providing parents with resources and intervention strategies
- f. Consulting with the Behavior Educator and Behaviorist to adopt behavioral plans to include a focus on developing specific social skills
- g. Making a referral for evaluation
- h. Referring staff to the Employee Assistance Program, if they are a target.
- i. Implementing the progressive discipline policies if the aggressor is a staff person.

2) Taking Disciplinary Action

If the Vice President for Student Programs and Services, Program Directors, their designees, or the Anti-Bullying Committee determines that disciplinary action is appropriate, the disciplinary action will be determined on the basis of facts found by the Vice President for Student Programs and Services, Program Directors, their designees, or the Anti-Bullying Committee during the investigation, including the nature of the conduct, the age of the individual(s) involved, the developmental level of the students, and the need to balance accountability while teaching appropriate behavior. Discipline will be consistent with the Cardinal Cushing Centers/St. Coletta School Bullying Prevention and Intervention Plan with the school's Behavior Management Plan, or with the Organization's progressive discipline policy. Discipline procedures for student with disabilities follow the guidelines set forth in the federal Individuals with Disabilities Education Act (IDEA).

As part of the action plan response, the individual will receive education about identifying and understanding bullying behavior and the impact of that behavior. The student's individualized program goals will reflect the necessary supports needed given the students behavior. If the Vice President for Student Programs and Services, Program Directors, their designees or the Anti-Bullying Committee determines that an individual knowingly made a false allegation of bullying or retaliation, that individual may be subject to consequences within the Positive Behavior Intervention System (PBIS) and SafetyCare guidelines or the progressive discipline policies. Depending on the severity of the incident, further interventions may include clinical individual and/or group therapy, behavior modification plans formulated and monitored by our Behavior Department, re-

evaluation of the students individualized program, collaboration with law enforcement, and/or continued follow-up.

3) Promoting Safety for the Target and Others

The Vice President for Student Programs and Services, Program Directors, their designees or the Anti-Bullying Committee will consider what adjustments, if any, are needed in the school environment to enhance the target's sense of safety and that of others. One strategy that the Vice President for Student Programs and Services, Program Directors, their designees, or the Anti-Bullying Committee may use would be to increase staff supervision at transition times and in locations where bullying is known to have occurred or is likely to occur and adjust the level of independence of the students involved. In addition, the Student Program Coordinator and Clinician will collaborate on addressing the topic of bullying in the student's individualized program and therapeutic services and continue to work with the student in developing positive coping skills.

After an incident occurs, the team of staff directly working with the aggressors and targets will meet to review the investigation and determine what plan of action needs to be in place or referral of services needs to be administered. Within a reasonable period of time following the determination and the ordering of remedial and/or disciplinary action, the Vice President for Student Programs and Services, Program Directors, their designees, or the Anti-Bullying Committee 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 Vice President for Student Programs and Services, Program Directors, their designees, or the Anti-Bullying Committee will work with appropriate school staff to implement them immediately.

VIII. COLLABORATION WITH FAMILIES

Cardinal Cushing Centers/St. Coletta Day School makes every effort to collaborate with students' families in order to increase the capacity of the school to prevent and respond to bullying.

Parental Cooperation

The prevention of bullying in our schools must be a joint effort involving both school staff and parent/guardians. The role of the parent of the target and or aggressor (if students) in understanding the bullying situation and working with their child and the school is crucial to the student's development of appropriate social skills.

- A. Parent Education and Resources:** Cardinal Cushing Centers/St. Coletta School will offer educational programs for parents and guardians that are focused on the parental components of the anti-bullying and social competency curricula used by the school. The programs will be offered in collaboration with the *"Parents' Advisory*

Committees.” This will enable parents and guardians to reinforce the curriculum from home, and help promote the safety of all students.

B. Notification Requirements:

The Cardinal Cushing Centers/St. Coletta School has developed a plan for ongoing professional development to build the skills of all staff members, including, but not limited to, administrators, educators, nurses, clinicians, student program coordinators, residential staff, specialists, and the recreational department, to prevent, identify and respond to bullying. The content of such professional development may include, but is not limited to the following areas:

- Developmentally appropriate strategies to prevent bullying incidents
- Developmentally appropriate strategies for immediate, effective interventions to stop bullying incidents information regarding the complex interaction and power differential that can take place between and among an aggressor(s), target(s) and witnesses to the bullying.
- 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
- Information on the incidence and nature of cyber-bullying
- Internet safety issues as they relate to cyber-bullying

Each year Cardinal Cushing Centers/St. Coletta School will inform parents or guardians of enrolled students about the anti-bullying curricula being utilized. This notification includes information about the dynamics of bullying, including cyber-bullying and online safety. The school will send written notification each year about the student-related sections of the plan and the school’s Internet Use Policy. All notices to parents will be made in a hard copy and electronic formats, and will be available in the language(s) most prevalent among the parents or guardians.

As stated in M.G.L. c. 71, § 370, nothing in this Plan requires the school or staff to respond to any non-school related activities, functions, or programs.

C. Parent Resources

The following is a list of examples of typical resources that may be provided to parents:

- Information on services and resource contacts for questions or concerns
- Bullying Brochures and Information
- Articles and resources provided through our newsletter
- Cardinal Cushing Centers/St. Coletta website as a vehicle for communicating with parents and as a resource for parents to get educational information, forms, reporting procedures, etc.

IX. RELATIONSHIP TO OTHER LAWS

Consistent with state and federal laws, and the policies of the school, no person shall be discriminated against in admission to Cardinal Cushing Centers/St. Coletta Day School in obtaining the advantages, privilege and courses of study of such schools on account of race, color, sex, religion, national origin, or sexual orientation. Nothing in the Plan prevents the schools 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 schools to take disciplinary action or other action under M.G.L. c. 71, § 370 or 37H ½ other applicable laws, or school policies in response to violent, harmful, or disruptive behavior, regardless of whether the Plan covers the behavior.

X. ANTI-HAZING POLICY

The term "hazing" as used in M.G.L. c. 269, §§ 17-19, shall mean any conduct of method of initiation into any student organization, whether on public or private property, which willfully or recklessly endangers the physical or mental health of any student or other person. Such conduct shall include whipping, beating, branding, forced calisthenics, exposure to the weather, forced consumption of any food, liquor, beverage, drug or other substance, or any other brutal treatment or forced physical activity which is likely to adversely affect the physical health or safety of any such student or other person, or which subjects such student or other person to extreme mental stress, including extended deprivation of sleep or rest or extended isolation.

Notification Requirements

1) The Vice President for Programs and Services will issue a copy of M.G.L. c 269, 17 through 19, to every secondary school age student enrolled full-time, and every student group, student team, or student organization, including every unaffiliated student group, student team, or student organization, and a copy of Cardinal Cushing Centers anti-hazing disciplinary policy approved by the Board of Trustees.

In addition, Cardinal Cushing Centers will file an annual report with the Massachusetts Department of Elementary and Secondary Education (DESE) at least annually certifying that:

a) Cardinal Cushing Centers is compliant with its responsibility to inform student groups, teams, or organizations, and every full-time enrolled student, of the provisions of M.G.L. c. 269, 17 through 19; b) Cardinal Cushing Centers adoption of a disciplinary policy with regard to the organizers and participants of hazing; and c) That Cardinal Cushing Centers hazing policy has been included in the student handbook or other means of communicating school program policies.

Disciplinary Action

Based on the presenting disabilities at Cardinal Cushing Centers, many of our students would require a manifestation determination prior to the implementation of any disciplinary proceedings. Should an investigation determine that an incident was clearly an act of hazing, and then discipline may be imposed on the aggressor after the

assessment of their disability issues. These actions will be determined based on the student's skill set and level of understanding. They may include movement away from the target and loss of preferred activities (as based on their IEP and behavior support plan). In the event none of these interventions work, we would move to our student suspensions and termination of placement policy.

If the Vice President for Programs and Services or designee decides that disciplinary action is appropriate, the disciplinary action will be determined on the basis of facts of each case. This would include 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 and/or district's code of conduct.

Discipline procedures for student with disabilities are governed by the federal Individuals with Disabilities Education Act (IDEA), which should be read in cooperation with state laws regarding student discipline.

If the Vice President for Programs and Services or designee determines that a student knowingly made a false allegation of hazing, that student may be subject to disciplinary action as described in the investigation section of this policy.