



Policy Title/Subject: Bullying Prevention and Intervention Policy & Plan

Category and Number: RIGHTS – D.2

Approval Date(s): 5/21/19

Date of Implementation: 5/21/19 – procedural revisions 3/7/22

Policy Supersedes: N/A

Purpose of Policy: To describe Crystal Springs procedures related to bullying prevention.

Scope/Applicability: All employees of the Children’s Program at Crystal Springs, Inc.

Responsibility for Policy Development, Implementation, and Oversight: Director of Children’s Services

Policy Statement: Crystal Springs School provides residential and educational services to meet the needs of severely to profoundly developmentally disabled children and adolescents. The severity and nature of our students’ disabilities precludes participation in some of the concerns addressed by the law, including cyber bullying and nearly all instances of verbal/written forms of intimidation. Aggression against others is typically addressed on an individual basis through the development of behavior intervention plans which are carefully monitored by a student’s educational, clinical and residential team, Crystal Springs School understands that in addition to students themselves, that bullying behavior may also be perpetrated by school staff members. The following policy has been developed to comply with the requirements of the Massachusetts Anti-Bullying Law; M.G.L. Chapter 71, section 370.

Role of Leadership

Crystal Springs School is committed to providing a living and learning environment that promotes health, safety, dignity, respect and choice. Leadership and guidance for students is supplied through the actions of educational and residential direct care staff, teachers, managers, administrative and clinical staff. Crystal Springs also provides training and accountability for school staff members regarding the issue of bullying.

Definitions:

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

Bullying as defined in M.G.L. Chapter 71, Section 370 is the repeated use by one or more students of a written, verbal, or electronic expression or a physical act or gesture or any combination thereof, directed at a target that:

- i. causes physical or emotional harm to the target or damage to the target’s property;



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

Cyber bullying is bullying through the use of technology or electronic devices such as telephones, cell phones, computers and the internet. It includes, but is not limited to, e-mail, instant messages, text messages, and internet postings. See M.G.L. Chapter 71, Section 370 for the legal definition of cyber bullying.

Hostile environment as defined in M.G.L. Chapter 71, Section 370, is a situation in which bullying causes the school environment to be permeated with intimidation, ridicule, or insult that is sufficiently severe or pervasive to alter the conditions of a student's education.

Retaliation is 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: educators; administrators; counselors; school nurses; cafeteria workers, custodians, bus drivers, athletic coaches, advisors to extracurricular activities, support staff, or paraprofessionals.

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

Procedure(s):

1. **Public involvement in development of the Plan** – Administrative, educational and clinical staff assisted with the development of this plan. Prior to adoption of this plan, copies of it were reviewed by members of Crystal Springs School's Management Team, Board of Directors and distributed to parents/guardians.
2. **Assessment of needs and resources** – Information about aggression and bullying is present in student materials regarding their rights. Teachers are periodically required to review information on aggression and bullying with their classrooms. Support staff who work directly with students annually attend a Nonviolent Crisis Intervention training program to assist them to identify and manage student behavior in a therapeutic manner. Behavioral data is collected as needed across environments for students who display aggression. Incident reports are completed for students who engage in student to student aggression. This data is reviewed by a behavioral specialist who is assigned to the student. Based on the data collected, a behavioral support plan may be developed to supplement Universal Supports to assist the student to self-regulate any presenting maladaptive



behavior. This behavioral support plan is reviewed by all members of the child's team, including parents/guardians. A student's behavioral support plan is reviewed and modified as needed to be reflective of responses by the student to treatment.

An Incident/Observation Report is filled out whenever a student is injured, including by another student. These reports are reviewed by supervisory and nursing staff. The information contained in these reports may provide useful information pertaining to a student being a repeated target of an aggressor. Should it be determined that conditions exist as defined by the Anti-Bullying Law, then further action will be warranted.

3. **Planning and oversight –**

- a) Any reports received that reference bullying behavior by a school staff member will be forwarded to the Director of Children's Services for review and determination of appropriate actions.
- b) Any reports received that reference student-on-student aggression will be forwarded to the Director of Behavioral Services for review.
- c) Upon review of reports, if it is determined that a pattern of aggression exists, a member of the Behavioral Services department will **request** a meeting to plan specific interventions to address this issue. Those attending the meeting will consider the following:
 - I. Whether the aggression is targeted or incidental
 - II. If changes to the behavior support plan are in order to prevent recurrence of aggression
 - III. If changes in staffing patterns are necessary to prevent recurrence of aggression
 - IV. If a change in residence or classroom is necessary to prevent recurrence of aggression
- d) Incident/Observation Reports will document any aggression resulting in injury to another student. Attempted aggression or aggression that does not result in injury will be reported to the Department of Behavioral Services and documented.
- e) All staff will have access to this policy as part of the school's policy manual, which will be available in each of the classrooms, residences and additional offices on campus. Additionally, it is incorporated into annual training refreshers that are attended by all direct and indirect support staff.
- f) Following a review of an incident of student to student aggression, a plan for debriefing will be developed for students who are determined to be either the target or aggressor Pictures, objects, and American Sign Language will assist with providing the information they need to process the aggressive incident. Targets will be provided with emotional/medical supports as needed. Aggressors will be provided with an opportunity to review rules related to proper social behavior and individual rights of others in a manner consistent with their abilities.
- g) All teachers will create developmentally appropriate lesson materials designed to teach the students in their classroom about bullying, the effects of bullying, and how to properly socialize with one another. These materials will be reviewed at least annually or more often as warranted.



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- h) Use of the internet by students is monitored by support staff on a 1:1 basis. This is primarily due to the severe nature of students' cognitive or physical disabilities.
 - i) A posting of this policy will be maintained on Crystal Springs' School website.
 - j) This plan will be reviewed by department heads at least annually to update and revise as determined by the needs of the program and as requirements of the law are clarified through practice and implementation.
4. **Statement of Priority** – Crystal Springs School is committed to providing a safe and nurturing learning and living environment for all students in our program. As part of this commitment, students who are identified as exhibiting recurring aggression towards others are placed on a targeted or intensive behavior support plans to assist them in learning appropriate socialization and conflict resolution with others. A low student to staff ratio (1:3) helps to ensure that treatment plans are properly implemented and that adequate monitoring is present to ensure the safety of all students. All staff are expected to model appropriate interaction with those around them with respect to gender, sexual orientation, socio-economic status and respectful treatment of individuals with disabilities.
5. **TRAINING AND PROFESSIONAL DEVELOPMENT** - Training and professional development is strongly supported by a department solely devoted to providing learning opportunities for all support staff. All direct care employees are required to obtain a minimum of 24 hours of in-service time annually, which includes a significant amount of behavior intervention training. Other support personnel are required to also attend annual refreshers on topics relevant to the needs of our program.
- a) **Annual staff training on the plan** – All staff are required to receive training on the Bullying Prevention and Intervention Plan, including their specific roles in supporting it.
 - b) **Ongoing professional development** – In order to create a school climate that promotes safety, civil communication, and respect for differences, Crystal Springs School offers additional professional development opportunities that assist with identifying and responding to aggressive or bullying behavior in a manner that is respectful of all individuals involved.
 - I. The Nonviolent Crisis Intervention training program created by the Crisis Prevention Institute is required by all direct care staff as a tool to identify and respond to aggressive behavior. Other components of this training include learning about the COPING model, which has applications relevant to processing with a student the implications of acting out behavior. This corresponds to the law's requirement of sec. (370)(d)(4)(i) developmentally appropriate strategies to prevent bullying, ([d][4][ii]) developmentally appropriate strategies for immediate, effective interventions to stop bullying incidents and ([d][4][iii]) information regarding the complex interaction and power differential that can take place between and among an aggressor, target, and witnesses to bullying.



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- II. Rights, Dignity and Values training is provided to all staff as a tool for identifying the rights that exist for students with disabilities as well as how individuals with disabilities are more susceptible to mistreatment by others. The information contained in this training corresponds with law requirement ([d][4][iv]) research findings on bullying, including information about specific categories of students who have been shown to be particularly at risk for bullying in the school environment. Additional information will be added to this training to include cyber bullying, which will correspond with additional requirements ([d][4][v]; [d][4][vi]).
- III. When writing Individualized Education Programs for students at our school, the team will address the needs of students with autism or any other disability that affects social skills development that makes them particularly susceptible to aggression or bullying. The team will determine where on the IEP this information would be most appropriately placed.
- IV. A comprehensive listing of available professional development training opportunities is available upon request. Many of these specifically address such topics as promoting and modeling the use of respectful language, understanding and respecting diversity and differences, and using positive behavioral support strategies effectively. In addition to this, communication, self-regulation and socialization goals/objectives are included in many of our students' Individualized Education Programs as deemed necessary by the team.
- V. **Written notice to staff** – Crystal Springs' policy on bullying will be reviewed with staff annually and staff will be reminded of its location in the school policy book during this refresher training.

6. ACCESS TO RESOURCES AND SERVICES

- a) **Resources** – Students attending Crystal Springs School have the benefit of support staff available to them 24 hours a day. These include residential counselors, teacher assistants/aides, pre-vocational and adaptive physical education aides, behavioral specialists house managers, special education teachers, nursing, clinical and therapeutic staff.
- b) **Counseling and other services** – The school maintains a physician medical director as well as professional relationships with local licensed counseling and psychiatric services. Other services may be provided as covered by personal and family insurance plans.
- c) **Students with disabilities** – As previously stated, all students who attend Crystal Springs School have severe developmental disabilities and may also possess significant physical limitations as well. Students receive the services of a special education teacher who works with a multi-disciplinary team to determine which areas are impacted by a student's disability. Communication, social skills, and physical limitations are frequently identified as contributing to a student's



susceptibility to harassment, teasing, or other types of mistreatment, which may include bullying. Crystal Springs School strives to create a safe and respectful learning environment where students are provided with instruction to assist them with reaching their individualized goals.

7. **ACADEMIC AND NON-ACADEMIC ACTIVITIES** - All academic activities are based on existing Massachusetts Curriculum Frameworks, modified to meet our students' cognitive ability levels. Due to the nature of our program, strong emphasis is placed on instruction in the areas of communication, socialization and motor skills for the majority of our students.
 - a) **Specific bullying prevention approaches** – All teachers at Crystal Springs School have been required to create learning materials that pertain to the topic of bullying. These lessons include pictures and computer generated images, objects, and ASL use as developmentally appropriate. Scripts and social stories are important components of these activities. All computer use is carefully monitored by support staff, who typically must assist a student on a 1:1 basis in order for them to access the internet. The teacher or aides typically find a website that is suitable for a student, and they will activate a touch screen or switch to meaningfully participate. Cyber bullying is not something that students who attend our school are cognitively able to participate in. All support staff at our school are required to model respectful interactions with one another, and recognize and support diversity among both their co-workers and our student population. Crystal Springs also incorporates environmental changes and group management strategies within our prevention approaches
 - b) **General teaching approaches that support bullying prevention efforts** – Crystal Springs School as an organization, has a non-discriminatory policy in place protecting the rights of many diverse groups including those with disabilities and who may be LGBT. This includes both school personnel and students. Positive reinforcement strategies are embedded in each behavior support plan that is written for students who struggle with self-regulation of aggression. If it is determined by the team that a student requires specific socialization, communication, or behavioral guidelines, goals are formalized in their IEP, addressed in formalized behavior support programs and the skills are practiced across all settings. Positive relationships are encouraged between students and supporters, and incidental teaching opportunities, social modeling, direct instruction, task analysis, discrete trials, and reinforcement are tools used to foster appropriate interactions as well as assist students in acquiring new skills.
8. **POLICIES AND PROCEDURES FOR REPORTING AND RESPONDING TO BULLYING AND RETALIATION**
 - a) **Reporting bullying or retaliation** – Any school personnel, parents/guardians or the students themselves may report instances of bullying or retaliation to the Director of Behavioral Services and/or the Director of Children's Services at any time. This may be done anonymously, orally or in writing. The Director of



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Behavioral Services has a mailbox located in the main school area, voicemail and e-mail. Since the vast majority of students who attend our program use only informal means to communicate, it may be necessary to report an observed change in behavior (i.e. becoming upset when around another student, change in facial expression or mood around another student), or injuries that occur when in proximity to another individual. All injuries are documented by completing an Incident/Observation Report.

- b) Responding to a report of bullying or retaliation** – Any report of bullying or retaliation will be immediately addressed by the team, which may include teachers, aides, residential managers, and residential counselors and program administrators. Steps will be taken to ensure that the student does not continue to be targeted. As previously stated, if the Director of Behavioral Services feels that targeted aggression may be taking place, a meeting will be requested and recommendations will be made as previously outlined in the section under “Leadership”. Parents/guardians will be notified of allegations of bullying and the steps taken to protect the target. If it is believed that criminal charges are likely to occur as a result of the incident, then the local law enforcement agency will be notified. This will be done at the determination of the Director of Children’s Services.
 - I.** Additionally, Crystal Springs maintains an Abuse, Neglect & Exploitation Reporting Policy in compliance with Chapter 119, Section 51A of the Massachusetts Child Abuse and Neglect Reporting Statute. In our mandated reporter capacity, a 51A report will be filed for any witnessed or suspected abuse or neglect.
- c) Investigation** – Further investigation into this matter may be deemed necessary at the discretion of the Director of Children’s Services, and if this is the case, he/she will appoint the necessary personnel to perform this task. Interviews will be conducted with staff, witnesses, and parents/guardians and documented. Due to the severity of disabilities exhibited by the students attending our program, interviews with students involved will most likely not be possible. A formal written report will be generated that will relate the results of the investigation. Student confidentiality will be maintained to the maximum extent possible.
- d) Determinations** – The Director of Children’s Services will determine the steps necessary to prevent recurrence of bullying or retaliation and determine what remedial action is required as well as determine what responsive actions and/or disciplinary action is required. Recommendations made by participants of related meeting(s) may also be taken into consideration. Parents/guardians of the target will be notified by the director or a designee of the aggressor and what action(s) are being taken to prevent recurrence.
- e) Responses to bullying** – If it is determined that bullying or retaliation has occurred, then the law allows for teaching appropriate behavior through skill-building. These skill-building sessions will be created through the collaboration of the individual’s IEP team, and a behavior support plan may need to be created or revised accordingly. Due to the severity and nature of the developmental disabilities present in Crystal Springs School’s population, it is unlikely that



disciplinary action would be taken against students. Recommendations made by team members, at the discretion of the Director of the Children's program, would more likely be considered which may include changes made to a classroom, residence and/or behavior support strategies.

9. COLLABORATION WITH FAMILIES - Since Crystal Springs School is a residential facility, implementation of bullying prevention and intervention curricula will be used both in the educational and residential programs. This allows for continuity of practice that optimizes a positive impact on behavioral support strategies. Parents will be made aware of the school's bullying policy in writing annually, and be provided with opportunities to obtain additional information about it through participation in Parent Advisory Group meetings. For reasons previously stated, online safety and cyber bullying is not something that students who attend Crystal Springs School will be exposed to, so information shared with parents about this issue will be for informational purposes only, and not have particular relevance to their child who attends our school. Copies of this Bullying Prevention and Intervention Plan will be made available in the native language of parents/guardians if requested.

- a) Parent education and resources** – Additional information and resource materials will be made available to parents who request it, and will be provided during designated PAG meetings. Parents/guardians will be notified in writing of meetings when the Bullying Prevention and Intervention Plan is listed on the agenda as a topic for discussion.
- b) Notification requirements** – Each year Crystal Springs School will inform parents/guardians of enrolled students about the anti-bullying curricula that are being used. The school plan will be posted on the School's website.

10. PROHIBITION AGAINST BULLYING AND RETALIATION - Acts of bullying, which include cyber bullying, are prohibited:

- a)** 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, at a school bus stop, on a school bus or other vehicle owned, leased, or used by a school district or school; or through the use of technology or an electronic device owned, leased, or used by a school district or school, and
- b)** At a location, activity, function, or program that is not school-related through the use of technology or an electronic device that is not owned, leased, or used by a school district or school, if the acts create a hostile environment at school for the target or witnesses, infringe on their rights at school, or materially and substantially disrupt the education process or the orderly operation of a school.

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



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11. RELATIONSHIP TO OTHER LAWS - Nothing in the plan is designated or intended to limit the authority of the school or district to take disciplinary action or other action under M.G.L. Chapter 71, Section 37H or 37H1/2, other applicable laws or local school or district policies in response to violent, harmful, or disruptive behavior, regardless of whether the plan covers the behavior.

References: *Massachusetts Anti-Bullying Law; M.G.L. Chapter 71, section 370.
DESE Regulation 603 CMR 49.00*