

*The Devereux School Bullying Prevention and  
Intervention Plan*

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## Priority Statement

The Devereux school expects that all members of the school and residential community will treat each other in a civil manner and with respect for differences.

The school and residential communities are committed to providing all students with a safe learning and living environment that is free from bullying, retaliation, and cyberbullying. This commitment is an integral part of our comprehensive efforts to promote learning, and to prevent and eliminate all forms of bullying and other harmful and disruptive behavior that can impede the learning process.

We understand that members of certain student groups, such as students with disabilities, students who are gay, lesbian, bisexual, or transgender, and homeless students may be more vulnerable to becoming targets of bullying, harassment, or teasing. The school and residential communities will take specific steps to create a safe, supportive environment for vulnerable populations in the Devereux community, and provide all clients with the skills, knowledge, and strategies to prevent or respond to bullying, harassment, or teasing.

We will not tolerate any unlawful or disruptive behavior, including any form of bullying, cyberbullying, or retaliation, in our school buildings, on school grounds, at school-related activities or in our residences. We will investigate promptly all reports and complaints of bullying, cyberbullying, and retaliation, and take prompt action to end that behavior and restore the target's sense of safety. We will support this commitment in all aspects of our Devereux community, including curricula, instructional programs, staff development, extracurricular activities, and parent/guardian involvement.

The Bullying Prevention and Intervention Plan is a comprehensive approach to addressing bullying, retaliation and cyberbullying, and the Devereux community's commitment to working with clients, staff, families, law enforcement agencies, and the community to prevent issues of violence. This plan affords all students the same protection regardless of their status under the law. In consultation with these constituencies, we have established this Plan for preventing, intervening, and responding to incidents of bullying, cyberbullying, and retaliation. The Principals and the Program Directors are responsible for the implementation and oversight of the Plan.

## **DEVEREUX'S MISSION**

Devereux changes lives and nurtures human potential. We inspire hope, ensure well-being, and promote meaningful life choices. Our mission is achieved through a wide range of services and supports for individuals and families.

## **PROHIBITION AGAINST BULLYING AND RETALIATION**

Acts of bullying, which include cyberbullying, are prohibited:

1. on campus grounds and property immediately adjacent to campus grounds, at a Devereux-sponsored or campus-related activity, function, or program whether on or off campus grounds, on a school bus or other vehicle owned, leased, or used by Devereux; or through the use of technology or an electronic device owned, leased, or used by Devereux, and
2. at a location, activity, function, or program that is not Devereux-related through the use of technology or an electronic device that is not owned, leased, or used by Devereux, if the acts create a hostile environment at school or on campus 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 campus.

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

The protection of students from bullying is a serious matter. This document pertains to the protection of targets of bullying from students and Devereux staff. Devereux staff include but is not limited to: educators, administrators, school nurses, paraprofessionals, and all other Devereux employees who work either directly or indirectly with the students. Devereux students are also protected from contract workers, such as the cafeteria staff or employees from sending schools, such as bus drivers and monitors.

## **POLICIES AND PROCEDURES FOR REPORTING AND RESPONDING TO BULLYING AND RETALIATION**

### **Reporting Bullying or Retaliation**

Reports of bullying or retaliation may be made by staff, students, parents or guardians, or others, and may be oral or written. Oral reports made by or to a staff member shall be recorded in writing. All Devereux staff members are required to report immediately to the Principal and the Program Director any instance of bullying or retaliation the staff member becomes aware of or witnesses. Reports made by students, parents or guardians, or other individuals who are not Devereux staff members, may be made anonymously. Devereux School will make a variety of reporting resources available to our entire campus community including an Incident Reporting Form and an email address.

Use of an Incident Reporting Form is not required as a condition of making a report. However, Devereux will:

1. include a copy of the Incident Reporting Form in the beginning of the year packets for students and parents or guardians;
2. make a copy of the Incident Reporting Form available in the school's main office, reception, the nursing building, and the units; and
3. on the school's website.

The Incident Reporting Form will be made available in the first language of the student and parent/guardian.

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

### **Reports by Staff**

All bullying or retaliation incidents will be reported immediately orally and/or in writing to the principals, on the day the incident occurred or the day the incident was reported. If the incident occurs during non school hours, the supervisor must report it to the Campus Coordinator who will notify Administration on Call. Additionally, the staff will report the incident to a designated voicemail number that will include the Program Director's, and principals, phone extensions. The Incident Report Form system will serve as written notification for Devereux staff and is required.

### **Reports by Students, Parents/Guardians, and Others**

The Devereux school expects students, parents/guardians, or other individuals who

witness or become aware of an instance of bullying or retaliation involving a student to report it to a staff. Reports may be made anonymously, but no disciplinary action will be taken against an alleged aggressor solely on the basis of an anonymous report. Students, parents/guardians, and others may request assistance from a staff member to complete a written report. Students will be provided practical, safe, private, and age appropriate ways to report and discuss an incident of bullying with a staff member, or with principals or Program Director. Reporting forms will be available on line, at switchboard, residential units, the school, and in the nursing building.

Upon receiving notice, the principals will notify the appropriate Program Directors and clinicians that a bullying or retaliation incident has occurred. This notification will serve as an alert that there has been a complaint. An initial safety assessment will be made and the aggressor and the target will be placed on Line of Sight (LOS) supervision and/or separation.

Based on the initial report, a fact finding investigation will be conducted. The principal or Program Director will coordinate this investigation. This will help inform the initial response.

**Notice to Parents or Guardians.**

When appropriate, the Program Director will coordinate notification to the aggressor and target's guardian or agency, school system, and if appropriate, the aggressor and target's family, that a bullying or retaliation complaint has been made.

Upon determining that bullying or retaliation has occurred, the principals or Program Director will promptly coordinate the notification to the parents/guardians and agency of the target and the aggressor. The procedure for responding to the bullying incident will be communicated. There may be circumstances in which the parents/guardians are contacted prior to any investigation.

**Notice to Another School or District.**

The principals and case managers will coordinate notification to the Out of District coordinator promptly by telephone or e-mail within 24 hours so that each school may take appropriate action.

**Notice to Law Enforcement.**

At any point after receiving a report of bullying or retaliation, including after an investigation, if there is a reasonable basis to believe that criminal charges may be pursued against the aggressor, the principals or Program Director will coordinate the notification of the local law enforcement agency. Also, if an incident occurs on campus grounds and involves a former client under the age of 21, who is no longer enrolled in school, the principals 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 cases involving physical harm, the police will also be notified.

### **Investigation.**

The principals or Program Director will promptly coordinate the investigation of all reports of bullying or retaliation and, in doing so, will consider all available information known, including the nature of the allegation(s) and the ages of the students involved.

The investigation will include, among other things, interviewing students, staff, witnesses, and parents/guardians or others as necessary. A Client Care Monitoring Committee meeting will be scheduled to discuss the allegation. The investigator will remind the alleged aggressor, target, and witnesses that retaliation is strictly prohibited and will result in disciplinary action. The following criteria must be met to determine an instance of bullying:

1. Repeated
2. Power Imbalance
3. Intent

Interviews may be conducted by a designee as determined by the aforementioned parties. To the extent practical, and given his/her obligation to investigate and address the matter, the investigator will maintain confidentiality during the investigative process. The investigator will maintain a written record of the investigation. A copy will go to the Executive Director, Assistant Executive Director, Program Director, principals, and Case Manager.

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

### **Determinations.**

The investigator will make a determination based upon all of the facts and circumstances. If, after investigation, bullying or retaliation is substantiated, the principals or Program Director will take reasonably calculated steps to prevent recurrence and to ensure that the target is not restricted in participating in campus or in benefiting from campus activities. The findings 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, principals or Program Director may choose to consult with the students' teacher(s), program staff, and/or clinician, and the target's or aggressor's parents/guardians, or supervisor 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 principals or Program Director will promptly coordinate the notification to the parents/guardians of the target and the aggressor about the results of the investigation and, if bullying or retaliation is found, what action is being taken to prevent further acts of bullying or retaliation. All notice to parents must comply with applicable state and

federal privacy laws and regulations. Because of the legal requirements regarding the confidentiality of student records, specific information cannot be reported to the target's parent or guardian about the disciplinary action taken unless it involves a "stay away" order or other directive that the target must be aware of in order to report violations. In instances where the aggressor may be a staff, the supervisor will be immediately notified and actions up to and including termination may occur.

### **Responding to a Report of Bullying or Retaliation.**

#### **Safety.**

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

The principals or Program Director 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.

### **Collecting and Analyzing Data (individual and program wide).**

The initial staff receiving the bullying or retaliation report will write an Incident Report (RADAR) detailing the incident or incidences. This system currently tracks bullying behavior. Clinicians are expected to read the RADARs every morning and if there is a bullying or retaliation incident highlighted, that information will be reported to the principals as well as the Program Director. When appropriate a Client Care Monitoring (CCM) meeting will be held to discuss the students involved in the incident.

School/residential climate surveys will be conducted biannually. Students, school faculty, residential staff, clinical staff, Devereux leadership, and parents/guardians will have access to the survey. Results will be collected and analyzed through the programs Senior Treatment Team. Dissemination of the results will occur at various program meetings and through the Bullying Prevention skills groups in school.

Individual instances of bullying behavior will be tracked through the RADAR system and individual student data will be analyzed by the Case Managers.

### **Supporting the Needs of Targets and Aggressors.**

#### **Individual Plans.**

##### **Target:**

When appropriate, an individual plan will be developed by the treatment team, including



the student, and parents/guardian to support the target.

**Aggressor:**

When appropriate, the team will write an individual plan that informs the treatment and education of the aggressor.

The strategies developed in response to the bullying complaint may range from, but not be limited to; mediation between the target and the aggressor and support of both, re-education of the aggressor, restoration or repairs to the target, assignment of a response from the Therapeutic Behavior Change Guidelines (TBCG), additional clinical time to deal with the issue, physical separation, or police involvement.

**Responses to Bullying.**

**Teaching Appropriate Behavior Through Skills-Building.**

Upon determining that bullying or retaliation has occurred, the following skill building approaches may be considered:

- offering individualized skill-building sessions based on the school’s anti-bullying curricula;
- providing relevant educational activities for individual students or groups of students, in consultation with clinical counselors and other appropriate clinical personnel;
- implementing a range of academic and nonacademic positive behavioral supports to help students understand pro-social ways to achieve their goals;
- meeting with parents and guardians to engage parental support and to reinforce the anti-bullying curricula and social skills building activities at home;
- adopting behavioral plans to include a focus on developing specific social skills;
- reevaluating medication
- peer mediation

**Taking Disciplinary Action.**

If the principal or Program Director decides that disciplinary action is appropriate, the disciplinary action will be determined on the basis of facts found in the initial investigation, including the nature of the conduct, the age of the student(s) involved, and the need to balance accountability with the teaching of appropriate behavior. Discipline will be consistent with the Plan and with the school’s Therapeutic Behavior Change Guidelines.

Disciplinary action may range from responding based on the Therapeutic Behavior Change Guidelines up to an in school suspension and meeting with the funding school district. Other responses could include mediation, restoration and repair, mandatory skill building groups, detention, and alternative programming.

If the principal or Program Director determines that a student knowingly made a false allegation of bullying or retaliation, that student may be subject to disciplinary action. This will include at minimum a restorative task related to the person accused, and a

educational task related to the consequences of making false allegations, both legal and social.

### **Promoting Safety for the Target and Others.**

The principals will consider what adjustments, if any, are needed in the school environment to enhance the target's sense of safety and that of others as well. The target will be included on the list for “morning check-ins”, a system currently in place to support students for at least one week after the occurrence of a bullying incident. If the target reports to be struggling, a CCM will be held to develop a plan to support the student. This may include additional clinical support, incentive plans, coping skill plans, or additional check in plans. One strategy that the principals may use is to increase adult supervision at transition times and in locations where bullying is known to have occurred or is likely to occur.

Within a reasonable period of time following the determination and the ordering of restorative and/or disciplinary action, the principals and or case managers 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 principal and case manager will work with appropriate school staff to implement them immediately.

### **COLLABORATION WITH FAMILIES.**

**Parent Education and Resources.** Devereux will offer education programs for parents and guardians that are focused on the parental components of the anti-bullying curricula and any social competency curricula used by the school. The curriculum will include the following topics: bullying dynamics, online safety and cyber bullying, as well as skills for reinforcing it at home. The programs will be offered in collaboration with the Special Education Parent Advisory Council, or similar forums.

**Notification Requirements.** Each year Devereux will inform parents or guardians of enrolled students about the anti-bullying curricula that are being used. This notice will include information about the dynamics of bullying, including cyberbullying and online safety. Devereux will send parents written notice each year about the student-related sections of the Plan and the school's or Internet safety policy. All notices and information made available to parents or guardians will be in hard copy and electronic formats, and will be available in the language(s) most prevalent among parents/guardians. Devereux will post the Plan and related information on its website.

### **PROFESSIONAL DEVELOPMENT.**

#### **Annual Staff Training on the Plan.**

Biannual training for all school and residential staff will include staff duties under the Plan, an overview of the steps that the principal or designee will follow upon receipt of a report of bullying or retaliation, and an overview of the bullying prevention curricula to be offered at all grades throughout the school. Staff members will participate in a Bullying Prevention Plan training during orientation. All staff will also receive annual refreshers on the Plan.

### **Ongoing Professional Development.**

The goal of professional development is to establish a common language and 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 Devereux's campus wide professional development will be informed by research and will include information on:

1. Developmentally appropriate strategies to prevent bullying or retaliation;
2. Developmentally appropriate strategies for immediate, effective interventions to stop bullying or retaliation 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 or retaliation;
4. Research findings on bullying or retaliation, including information about specific categories of students who have been shown to be particularly at risk for bullying or retaliation in the school environment;
5. Information on the incidence and nature of cyberbullying; and
6. Internet safety issues as they relate to cyberbullying.

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

Additional areas identified by the Devereux Community for professional development include:

- promoting and modeling the use of respectful, positive language;
- fostering an understanding of respect for diversity and difference;
- building relationships and communicating with families;
- constructively managing classroom and residential behaviors;
- using positive behavioral intervention strategies;
- applying constructive disciplinary practices based on Devereux's Therapeutic Behavior Change Guidelines (TBCG);
- teaching student's skills including positive communication, anger management, and empathy;
- engaging students in school or residential unit planning and decision-making;
- maintaining a safe and caring environment for all students; and
- Instructing students and staff on peer mediation.

### **Written Notice to Staff.**

Devereux will provide all staff with an annual written notice of the Plan by publishing information about it, including sections related to staff duties, in Devereux's employee

handbook and the code of conduct. Devereux's website will update the plan accordingly for parents.

### **THE CURRICULUM.**

The principals will periodically research appropriate bullying or retaliation curricula and programs to present to staff, students, and parents/guardians. These curricula will be developmentally appropriate for all level of student participation.

### **Specific Bullying Prevention Approaches.**

Bullying prevention curricula will be informed by current research which, among other things, emphasizes the following approaches:

- using scripts and role plays to develop skills;
- empowering clients to take action by knowing what to do when they witness other clients engaged in acts of bullying or retaliation, including seeking adult assistance;
- helping clients understand the dynamics of bullying and cyberbullying, including the underlying power imbalance;
- emphasizing cybersafety, including safe and appropriate use of electronic communication technologies;
- enhancing clients' skills for engaging in healthy relationships and respectful communications; and
- engaging clients in a safe, supportive school environment that is respectful of diversity and difference.
- Teaching students about the student-related sections of the Bullying Prevention and Intervention Plan.

### **General Teaching Approaches that Support Bullying Prevention Efforts.**

- setting clear expectations for students and establishing school and classroom routines;
- creating safe school and classroom environments for all students, including for students with disabilities, lesbian, gay, bisexual, transgender students, and homeless students;
- using appropriate and positive responses and reinforcement, even when students require discipline;
- using positive behavioral supports;
- encouraging adults to develop positive relationships with students;
- modeling, teaching, and rewarding pro-social, healthy, and respectful behaviors;
- using positive approaches to behavioral health, including collaborative problem-solving, conflict resolution training, teamwork, and positive behavioral supports that aid in social and emotional development;
- using the Internet safely; and
- supporting students' interest and participation in non-academic and extracurricular activities, particularly in their areas of strength.

### **POLICIES AND PROCEDURES.**

A Bullying Prevention Committee, lead by the principals and consisting of school and

residential staff, students, parents, and administrators will review and revise the current policies and protocols twice a year. Devereux's IT Department will consult with the committee on issues of Internet safety. School and residential supervisors will be responsible for implementation of all anti-bullying or retaliation policies and protocols and for making these policies and protocols part of their supervision with staff.

The Bullying Prevention Committee will recommend changes to the student and staff handbooks as well as to Therapeutic Behavior Change Guidelines (TBCG). The student handbook and TBCG is given to students upon admission. Staff will receive training in both during orientation and annually.

The Devereux School will biannually:

1. survey students, staff, parents/guardians on school climate and school safety issues;
2. collect and analyze school-specific data on the prevalence and characteristics of bullying; and
3. identify patterns of behaviors and areas of concern, that will inform decision-making for prevention strategies including, but not limited to, adult supervision, professional development, age-appropriate curricula, and Devereux support services.

## **ACCESS TO RESOURCES AND SERVICES.**

### **Resources.**

Our overarching treatment philosophy utilizes a trauma informed, relational approach framework that includes use of strength-based approaches, such as:

1. Positive Behavioral Support (PBS),
2. Applied Behavioral Analysis (ABA),
3. Cognitive Behavioral Treatment (CBT),
4. Motivational Interviewing, all within an interdisciplinary therapeutic milieu.
5. In addition, Devereux provides on-site psychopharmacological as well as medical/nursing services for residential students from 7:00am – 10:00pm seven days per week.

Our program model targets an array of supportive and evidence-based model of treatment based upon Applied Behavior Analysis and Positive Behavior Support. Multi-disciplinary teams conduct a thorough initial assessment of students' abilities in the service of creating individualized behavior support plans.

1. Students are also taught the necessary skills to form positive family and peer relationships using modified standard adult Dialectical Behavior Therapy (DBT) for use with adolescent females. While this DBT has demonstrated effectiveness for reducing emotion dysregulation and accompanying incidents of self harming behaviors, DBT is also the

- primary approach utilized with females with substance abuse problems at Devereux.
2. Problematic behaviors are dealt with by integrating psychoeducation, motivational interviewing techniques, harm reduction strategies, attendance at 12-Step meetings, cognitive-behavioral therapy and relapse prevention, in the service of developing a repertoire of healthier replacement behaviors.
  3. Utilizing a trauma-informed framework, the therapeutic milieu of the Boys' Program uses relational, cognitive-behavioral and positive behavior support approaches to decrease safety-interfering behaviors and to foster the development of effective communication and coping strategies. The program's motivational system reinforces these concepts through its focus on validation, in-vivo coaching of skills, reparation and restitution assignments, and natural consequences to address problematic behaviors.
  4. Throughout the continuum of care, students are exposed to numerous milieu-based, skill-enhancing groups, such as dialectical behavior therapy, aggression replacement training, adventure-based counseling, PAYA (Massachusetts' 'Preparing Adolescents for Young Adulthood' curriculum), sexual health and education, and substance-abuse education.

### **Counseling and other Services.**

Each student at Devereux has regular counseling sessions and access to a clinician when needed. Clinical on Call supports students in crisis. Anti-bullying skills groups are ongoing in school. Other skills groups occur regularly on the residential shift. Students diagnosed with Pervasive Development Disorder will have social skills development identified in their IEP as it relates to avoiding and responding to bullying, harassment, teasing, and retaliation. The CCM team, the clinician, or the clinical supervisor assists the school and residence in developing safety plans for students who have been targets of bullying or retaliation, providing social skills programs to prevent bullying, and offering education and/or intervention services for students exhibiting bullying behaviors. Tools include, but are not limited to, behavioral intervention plans, social skills groups, and individually focused curricula.

### **Referral to Outside Services.**

If and when the Devereux School determines that referral for outside services is required to support the student and family, a Services meeting will be held, including any outside agencies to discuss and provide recommendations for treatment.

### **DEFINITIONS.**

**Aggressor** is a student or staff who engages in bullying, cyberbullying, or retaliation.

**Bullying** is the repeated use by one or more students or 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 on the campus.

**Cyberbullying** is bullying through the use of technology or electronic devices such as telephones, cell phones, computers, and the Internet. It includes, but is not limited to, email, instant messages, text messages, and Internet postings.

**Hostile Environment** is a situation in which bullying causes the 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 living conditions.

**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, clinicians, nurses, cafeteria workers, custodians, bus drivers, athletic coaches, advisors to extracurricular activities, support staff, or paraprofessionals.

**Target** is a student or staff against whom bullying, cyberbullying, or retaliation has been perpetrated.

#### **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 the Devereux School or in obtaining the advantages, privilege and courses of study of this school on account of race, color, sex, religion, national origin, or sexual orientation. Nothing in the Plan prevents Devereux from taking action to remediate discrimination or harassment based on a person's membership in a legally protected category under local, state, or federal law, or school or district policies.

In addition, nothing in the Plan is designed or intended to limit the authority of the school to take disciplinary action or other action under M.G.L. c. 71, §§ 37H or 37H½, other applicable laws, or Devereux policies in response to violent, harmful, or disruptive behavior, regardless of whether the Plan covers the behavior.

