

ALL SAINTS ACADEMY BULLYING PREVENTION POLICY AND INTERVENTION PLAN

I. Introduction

All Saints Academy acknowledges that its purpose for existence is rooted in the mission of the Church. In fulfilling its role within the educational mission of the Church, All Saints Academy must share and live out, through Catholic Christian tradition, the message of Jesus Christ and be committed to providing an integrated Catholic educational environment that permeates all aspects of its daily life and operations. Each child must be challenged to reach his/her full potential by fostering in each child a love of learning and by providing an environment that also fosters respect and understanding of one another. In this regard, it is essential that a safe, positive and productive educational environment be established where students can attain the highest academic achievement and where no student shall be subjected to Bullying, Cyber-Bullying or Retaliation.

Bullying, Cyber-Bullying or Retaliation or other similar disruptive or violent behaviors constitute conduct that disrupts both a student's ability to learn and All Saints Academy's ability to educate its students in a safe and embracing environment. The All Saints Academy staff is expected to insist that all students behave appropriately and treat others with civility and respect. Bullying, Cyber-Bullying and Retaliation are not to be tolerated. Accordingly, All Saints Academy hereby promulgates this Bullying Prevention and Intervention Plan (the "Plan") as required by the Roman Catholic Bishop of Worcester Bullying Prevention Policy.

II. Definitions

For purposes of this Plan, the following definitions shall apply:

"Bullying" is the repeated use by one or more students or by a member of the school staff including, but not limited to, an educator, administrator, school nurse, cafeteria worker, custodian, bus driver, athletic coach, advisor to an extracurricular activity or paraprofessional of a written, verbal, or electronic expression, or a physical act or gesture, or any combination thereof, directed at a Victim that: causes physical or emotional harm to the Victim or damage to the Victim's property; places the Victim in reasonable fear of harm to him/herself, or of damage to his/her property; creates a Hostile Environment at School for the Victim; infringes on the rights of the Victim at the School; or materially and substantially disrupts the education process or the orderly operation of the school.

By way of example only, Bullying may involve, but is not limited to: unwanted teasing, threatening, intimidating, stalking, cyber-stalking, physical violence, theft, sexual, religious, racial or any other type of harassment, public humiliation, destruction of school or personal property, social exclusion, including incitement and/or coercion, rumor or spreading of falsehoods.

For the purpose of this Plan, whenever the term "Bullying" is used it shall include Cyber-Bullying (as defined below).

"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, electromagnetics, photo-electronic or photo-optical system, including, but not limited to, electronic mail, internet communications, instant messages or facsimile communications.

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 or posting creates any of the conditions enumerated in the definition of Bullying.

"Hostile Environment" means 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 the student's education.

"Perpetrator", means a student or a member of the school staff including, but not limited to, an educator, administrator, school nurse, cafeteria worker, custodian, bus driver, athletic coach, advisor to an extracurricular activity or paraprofessional who engages in Bullying or Retaliation.

“Retaliation” means 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.

“School Grounds” mean property on which a School building or facility is located or property that is owned, leased or used by a School for a School-sponsored activity, function, program, instruction or training.

“Staff” includes, but is not limited to, educators, administrators, counselors, nurses, cafeteria workers, custodians, bus drivers, athletic coaches, advisors to extracurricular activities, support staff, and paraprofessionals.

“Victim”, means a student against whom Bullying or Retaliation has been perpetrated.

III. Leadership

Leadership at all levels of the All Saints Academy community has played a critical role in developing and implementing this Plan in the context of other School and community efforts to promote a positive school climate. The Plan has been developed in consultation with the Superintendent, the Parent/Guardian Board, teachers, school staff, professional support personnel, school volunteers, administrators, community representatives, local law enforcement agencies, students, parents, guardians and any other stakeholders the Head of School deemed advisable. We all have a primary role in teaching students to be civil to one another and promoting understanding of and respect for diversity and difference. The Head of School and designated members of the staff, working under the oversight of the Superintendent, are collectively responsible for setting priorities and for staying up-to-date with current laws, Diocesan policies, and research on ways to prevent and effectively respond to bullying. It is also the responsibility of the Head of School and such designees to involve representatives from the greater school and local community in developing, implementing and periodically reviewing and updating the Plan. The Plan shall be reviewed and updated at least every two years, in consultation with other stakeholders as set forth above.

- A. **Assessing needs and resources.** The Plan is intended to be All Saints Academy’s blueprint for enhancing capacity to prevent and respond to issues of bullying within the context of other healthy school climate initiatives. As part of the planning process, school leaders, with input from families, the staff and others mentioned above, have assessed the adequacy of current programs; reviewed current policies and procedures; reviewed available data on bullying and behavioral incidents; and assessed available resources including curricula, training programs, and behavioral health services. This “mapping” process has assisted the school in identifying resource gaps and the most significant areas of need.
 - a. The Head of School is responsible for maintaining and reviewing all reports of bullying. This qualitative and quantitative collection of data includes:
 - i. The number of reported allegations of bullying or retaliation;
 - ii. The number and nature of substantiated incidents of bullying or retaliation;
 - iii. The number of students disciplined for engaging in bullying or retaliation; and
 - iv. Gathering feedback through informal meetings with students, parents/guardians, teachers, coaches, staff members, community organizations, and law enforcement.

- B. **Planning and oversight.** The Head of School is responsible for the following tasks under the Plan: Mrs. Joan E Matys, Head of School All Saints Academy, 12 Day Street or 48 Negus Street, Webster, MA, 01570 - 508-943-2735, email: headofschool@allsaintswebster.org
 - 1. Receiving reports on Bullying: All reports may be delivered through the preferred medium of the reporter, including in person, phone, email, or written letter. Reporters should expect to be contacted as soon as reasonably possible by the Head of School.

Any student who is the target of bullying or cyber-bullying or has witnessed an incident of bullying or cyber-bullying or otherwise has relevant information about bullying or cyber-bullying prohibited by this policy is strongly encouraged to promptly report the matter orally or in writing to the Head of School, or to any other faculty or staff member with whom the student is comfortable speaking. Also, any student who is subject to retaliation in violation of this policy or who knows of another student who has been subject to retaliation is urged to report it as soon as possible.

A parent or guardian of a student who is the target of bullying or cyber-bullying or of a student who has witnessed or otherwise has relevant information about bullying or cyber-bullying is strongly urged to promptly notify the Head of School or any other faculty or staff member. Furthermore, any parent/guardian who has witnessed bullying or cyber-bullying or has relevant information concerning such an incident is strongly urged to come forward to the guidance counselor or an administrator. A parent or guardian should also report any incident of retaliation in violation of this policy to an administrator.

Any member of the faculty or staff of All Saints Academy who witnesses or otherwise becomes aware of bullying or cyber-bullying in violation of this policy or who becomes aware of retaliation against a student who reported information concerning a violation of this policy is required to report it immediately to the Head of School. There are to be no exceptions. A member of the faculty or staff may not make promises of confidentiality to a student or parent or guardian who informs him/her of an allegation of bullying, cyber-bullying or retaliation. Faculty and staff may not make reports under this policy anonymously.

Administration also urges students and their parents and guardians not to make reports anonymously. Although there are circumstances in which an anonymous report can be better than none at all, it is far more difficult to ascertain the facts of what occurred if complaints are made anonymously. However, discipline cannot be enforced due to an anonymous report as students are afforded the due process of an investigation. Students, parents and guardians are encouraged to bear in mind that the school takes its policy against retaliation seriously.

Also, while All Saints Academy faculty, staff, and administration cannot promise strict confidentiality because information must be shared in order to conduct an effective investigation, the school follows a strict policy of only releasing information concerning complaints of bullying, cyber-bullying and retaliation to those who are on a legitimate need-to know basis.

2. Collecting and analyzing school-wide data on Bullying to assess the present problem and to measure improved outcomes. All cases are recorded on a bullying report form and charted throughout the course of the year and data is organized by date, reporters, investigators, conclusions, actions, safety plans, grade levels of perpetrators, grade levels of victims, and disciplinary.
3. The Head of School will conduct all investigations in a timely and confidential manner and may require relevant personnel to conduct the investigation, for example, the Athletic Director for a bullying allegation that involves an incident at an athletic event. All reports will be collected and analyzed throughout the year to determine how to best address areas of concern, identify gaps, deter retaliation, improve preventative measures, and to ensure student safety.
4. Planning for ongoing professional development. Based on the reports provided by the Head of School, the Administrative Team will shape ongoing professional development, including training for new teachers, staff members, and coaches; the notification of changes to policy for all teachers, staff members, and coaches; the attendance of conferences and workshops for teachers selected by the administration, and attendance at annual school programs offered by the District Attorney's Office.
5. Planning supports that respond to the needs of Victims and Perpetrators. When a complaint of bullying, cyber-bullying or retaliation is brought to the attention of the Head of School or other Administrators, an assessment is made as to whether any initial steps need to be taken to protect the well-being of students and to prevent disruption of their learning environment while the investigation is being conducted. As appropriate, strategies such as increased supervision may be implemented to prevent further bullying, cyber-bullying or retaliation during an investigation. Students who make reports, or who are reported as targets of bullying, will not be moved from classrooms or have their seating changed in a classroom.

The Head of School will work with all students found to be Victims or Perpetrators of bullying, cyber-bullying or retaliation to arrange for counseling at school, or either Catholic Charities or another acceptable agency. The school may request in writing that the student is participating in counseling as a condition of continued enrollment at All Saints Academy.

6. Choosing and implementing the curricula that the school will use. The Head of School will consult with the Campus Minister, Religious Education Office, and the District Attorney's Office to design and implement curricula that is relevant and age appropriate.
7. The development and revision of policies and protocols. The Head of School and review committee will develop and revise all current policies and protocols under the Plan every two (2) years, including an Internet safety policy and is responsible for the implementation.
8. Amending the Plan in Student/Staff Handbooks. The Head of School is responsible for amending student and Staff handbooks and codes of conduct based on the necessity to make changes based on the findings of investigations, but not less than once per year. Amendments may be made to the handbooks by updating electronic copies on the website if they occur during an academic school year.
9. Leading Family Engagement. The Review Team is responsible for leading the parent/guardian or family engagement efforts and drafting parent/guardian information materials. The Administrative will work in conjunction with the Parent/Guardian Organization and distribute information through the school newsletters, the school website and social media accounts. There are annual mandatory meetings for parents/guardian that are planned and conducted in partnership with the District Attorney's Office. The purpose of these meetings is to provide parents/guardians with the most current information and to create an educational forum for family engagement.
10. Review and Update of the Plan. The Review Team is responsible for reviewing and updating the Plan each year, or more frequently as required by changes in the law, or deemed necessary by the Administration in order to respond to mitigating circumstances.

C. Priority Statement. All Saints Academy is dedicated to ensuring the respect of, and protecting the dignity of, all members of the All Saints Academy community. Every student has the right to learn, study and participate in extracurricular activities without harassment, intimidation or bullying. As is consistent with Catholic social teaching, a correlative relationship exists between rights and responsibilities. Every All Saints Academy student accepts the responsibility to respect the rights of others to learn, study and participate in extracurricular activities without harassment or intimidation.

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

This Plan is a comprehensive approach to addressing Bullying, and the 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 and retaliation. The Head of School, working under the oversight of the Superintendent is responsible for the implementation and oversight of the Plan.

The Plan recognizes that certain students may be more vulnerable to becoming a Victim of bullying or harassment based on actual or perceived differentiating characteristics, including race, color, religion, ancestry, national origin, sex, socioeconomic status, homelessness, academic status, gender identity or expression, physical appearance, pregnant or parenting status, sexual orientation, mental, physical, developmental or sensory disability or by association with a person who has or is perceived to have 1 or more of these characteristics. In addition to the measures mentioned above and below, the school shall take the following, specific steps to support vulnerable students and to provide all students with the skills, knowledge and strategies needed to prevent or respond to bullying or harassment:

The young men and women who graduate from All Saints Academy are required to complete a religion course each year with the expectation that they will embrace the central tenets of Catholic social teaching, including the belief that all human beings are worthy of dignity and respect.

The Student Handbook and the Anti-Bullying Policy is reviewed with all students each fall. The handbook includes explicit policies around the issues of harassment and bullying. Additionally, the District Attorney's Anti-Bullying program presentations will be given on an annual basis. Administration raises issues of bullying with the Parent/Guardian Organization at annual meetings. Finally, all athletic coaches and extracurricular advisors for all grades are required to review school bullying policies with all participating students.

IV. Prohibition Against Bullying and Retaliation

Bullying is prohibited: On school grounds owned, leased or used by All Saints Academy; On property immediately adjacent to school grounds; At any 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 any other vehicle owned, leased or used by All Saints Academy or, through the use of technology or an electronic device owned, leased or used by the All Saints Academy; Bullying is also prohibited at a location, activity, function or program that is not school-related or through the use of technology or an electronic device that is not owned, leased or used by the school if the act or acts in question: create a hostile environment at school for the Victim; infringe on the rights of the Victim at school; or materially and substantially disrupt the education process or the orderly operation of the school. Retaliation against any person who reports bullying or retaliation, provides information during an investigation of bullying or retaliation, or witnesses or has reliable information about bullying or retaliation is also prohibited.

V. Training and Professional Development

- A. Annual Staff Training on the Plan. As required by M.G.L. c. 71, sec. 37O(e)(2), annual training on the Plan shall be provided for all All Saints Academy Staff; and, in the discretion of the Head of School, for volunteers who have significant contact with students. Such training will include staff duties under the Plan, an overview of the steps that the Head of School or his or her designee will follow upon receipt of a report of bullying or retaliation, and an overview of any bullying prevention curricula to be offered at the school. Staff members hired after the start of the School year are required to participate in school-based training during the school year in which they are hired, unless they can demonstrate participation in an acceptable and comparable program within the immediately preceding two years.
- B. Written Notice to Staff. Pursuant to Mass. Gen. Laws Chapter 71, Sec. 37O(e)(2), at the beginning of each school year the Head of School or his or her designee shall provide written notice to the school staff of the Plan.
- C. On-going Professional Development. The goal of professional development is to establish a common understanding of tools necessary for staff to create a school climate that promotes safety, civil communication, and respect for differences. Professional development will build the skills of staff members to prevent, identify, and respond to bullying. Professional development may be informed by research and may include information on: developmentally (or age-) appropriate strategies to prevent bullying; developmentally (or age-) 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 a Perpetrator, Victim, 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; and internet safety issues as they relate to cyber-bullying.
- D. Professional development will also address ways to prevent and respond to bullying or retaliation for students with disabilities and other groups identified as particularly vulnerable to bullying.

Additional areas identified by All Saints Academy for professional development include:

- promoting and modeling the use of respectful language;
- fostering an understanding of and respect for diversity and difference;
- building relationships and communicating with families;
- constructively managing classroom behaviors;
- using positive behavioral intervention strategies;
- applying constructive disciplinary practices;
- teaching students skills including positive communication, anger management, and empathy for others;

- engaging students in school or classroom planning and decision-making; maintaining a safe and caring classroom for all students; and creating a student-led Bullying Prevent campaign, under the guidance of the Head of School, that empowers students to take ownership of promoting safety and respecting differences.

VI. Access to Resources and Services

- A. Counseling and other services. The Head of School will implement safety plans and behavioral intervention plans in the form of writing contracts that are signed by parents/guardians and students to improve behavior. All Saints Academy may require counseling at school and external counselors, psychologists, and/or psychiatrists as a condition for continued enrollment and in some cases may request parents/guardians to sign a release to allow the Head of School to be in communication with outside resources to best serve our students.
- B. Students with disabilities. If All Saints Academy determines that students with disabilities may be vulnerable to bullying, harassment, or teasing because of his/her disability, the school will utilize educational, counseling, and spiritual measures to provide students with disabilities and their peers with skills to prevent, avoid, and respond to bullying. The school will also encourage students with disabilities to establish relationships with faculty members to provide additional support and comfort in order to make it more likely that a report of bullying will be made.
- C. Referral to outside services. After the assessment of bullying incidents, school staff will provide a list of local agencies, counselors, psychologists, psychiatrists, and youth programs that provide services that are age appropriate for both bullying Victims and Perpetrators. Additionally, the Head of School will provide all families with materials provided by the District Attorney's Office that include a list of services available in the community.

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

- A. 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. A school staff member, including, but not limited to, an educator, administrator, school nurse, cafeteria worker, custodian, bus driver, athletic coach, advisor to an extracurricular activity or paraprofessional, is required to report immediately to the Head of School 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 school staff members, may be made anonymously. The school will make a variety of reporting resources available to the school community including, but not limited to, an Incident Reporting Form (a copy of which is attached to this Plan as Addendum A) and a dedicated mailing address (All Saints Academy, Attn. Mrs. Matys/Bullying Report, 12 Day St., Webster, MA 01570).
- B. Use of an Incident Reporting Form is not required as a condition of making a report. The school will:
 - a. Include a copy of the Incident Reporting Form in the beginning of the year packets for students and parents or guardians, or advise them that such is available on the school web site;
 - b. The main office, and other locations determined by the Head of School or designee; and post it on the school's website pursuant to Mass. Gen. Laws Chapter 71, Sec. 370(e)(3). The Incident Reporting Form will be made available in the most prevalent language(s) of origin of students and parents or guardians.
- C. At the beginning of each school year, the school will provide the school community, including administrators, staff, students, and parents or guardians, with written notice of its policies and procedures for reporting acts of bullying and retaliation. Pursuant to Mass. Gen. Laws Chapter 71, Sec. 370(e)(1): Annual written notice of the relevant student-related sections of the Plan shall be included in the school handbook provided to students and their parents or guardians, in age-appropriate terms and in languages which are most prevalent among the students, parents or guardians. A description of the reporting procedures and resources, including the name and contact information of the Head of School, to the extent, if at all, not set forth in this Plan, will be incorporated in student and staff handbooks, on the school website, and in other information about the Plan that is made available to parents and guardians.
- D. Reporting by Staff
 - a. All Saints Academy staff member, including, but not limited to, an educator, administrator, school nurse, cafeteria worker, custodian, bus driver, athletic coach, advisor to an extracurricular activity or paraprofessional, shall report immediately to the Head of School or designee when he/she witnesses or becomes aware of conduct that may be bullying or retaliation. The requirement to report to the Head of School does not limit the authority of the staff

member to respond to behavioral or disciplinary incidents consistent with school policies and procedures for behavioral management and discipline as defined in the Student/Parent Handbook.

E. Reporting by Students, Parents or Guardians, and Others

- a. All Saints Academy expects students, parents or guardians, and others who witness or become aware of an instance of bullying or retaliation involving a student to report it to the Head of School or designee. Reports may be made anonymously, but no disciplinary action will be taken against an alleged Perpetrator solely on the basis of an anonymous report. Students, parents or 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 the Head of School.

F. Responding to a report of Bullying or Retaliation.

- a. Safety - Before fully investigating the allegations of bullying or retaliation, the Head of School will take steps to assess the need to restore a sense of safety to the alleged Victim and/or to protect the alleged Victim 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 Victim and/or the alleged Perpetrator in the classroom, at lunch, or on the bus; identifying a staff member who will act as a "safe person" for the Victim; and altering the Perpetrator's schedule and access to the Victim. The Head of School or designee will take additional steps to promote safety during the course of and after the investigation, as necessary.
- b. The Head of School 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. Responses to promote safety may include, but not be limited to, creating a personal safety plan; pre-determining seating arrangements for the witness/reporter and/or the alleged Perpetrator in the classroom, at lunch, or on the bus; identifying a staff member who will act as a "safe person" for the witness/reporter; and altering the Perpetrator's schedule and access to the witness/reporter. The Head of School will take additional steps to promote safety during the course of and after the investigation, as necessary.

G. Obligations to Notify Others

- a. Notice to parents or guardians. Upon determining that bullying or retaliation has occurred, the Head of School will promptly notify the parents or guardians of the Victim and the Perpetrator of this, and of the procedures for responding to it. There may be circumstances in which the Head of School or designee contacts parents or guardians prior to any investigation. Notice will be consistent with state regulations at 603 CMR 49.00 and with the Massachusetts Student Records Regulations, 603 CMR 23.00, and the Federal Family Educational Rights and Privacy Act Regulations, 34 CFR Part 99, as set forth in 603 CMR 49.07, to the extent applicable to a Catholic, non-public school.

H. Notice to Another School

- a. If the reported incident involves students from more than one school district, charter school, non-public school, approved private special education day or residential school, or collaborative school, the Head of School or designee of the school first informed of the incident will promptly notify by telephone the Head of School 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.

I. Notice to Law Enforcement.

- a. At any point after receiving a report of bullying or retaliation, including after an investigation, if the Head of School or designee has a reasonable basis to believe that criminal charges may be pursued against the Perpetrator, the Head of School 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 who is no longer enrolled in school, the Head of School or designee shall contact the local law enforcement agency if he or she has a reasonable basis to believe that criminal charges may be pursued against the Perpetrator. In making this determination, the Head of School will, consistent with the Plan and with applicable school policies and procedures, consult with the school resource officer, if any, and other individuals the Head of School deems appropriate (including, but not limited to, the Superintendent of Diocesan Schools, and if the Superintendent deems advisable, legal counsel for the Diocese).

J. Investigation.

- a. The Head of School will investigate promptly 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.
- b. During the investigation the Head of School will, among other things, interview students, staff, witnesses, parents or guardians, and others as necessary. The Head of School (or whoever else is involved in conducting the investigation) will remind the alleged Perpetrator, Victim, and witnesses that retaliation is strictly prohibited and will result in disciplinary action.
- c. Interviews may be conducted by the Head of School, other staff members as determined by the Head of School. To the extent practicable, and given his/her obligation to investigate and address the matter, the Head of School will maintain confidentiality during the investigative process. The Head of School will maintain a written record of the investigation. Procedures for investigating reports of bullying and retaliation will be consistent with school policies and procedures for investigations. If necessary, the Head of School will consult with the Superintendent of Diocesan Schools, and if the Superintendent deems advisable, legal counsel for the Diocese, about the investigation.

K. Determinations.

- a. The Head of School will make a determination based upon all of the facts and circumstances. If, after investigation, bullying or retaliation is substantiated, the Head of School will take steps reasonably calculated to prevent recurrence and to ensure that the Victim is not restricted in participating in school or in benefiting from school activities. The Head of School will: 1) determine what remedial action is required, if any, and 2) determine what responsive actions and/or disciplinary action is necessary.
- b. Depending upon the circumstances, the Head of School may choose to consult with the students' teacher(s) and the Victim's or Perpetrator's 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.
- c. The Head of School will promptly notify the parents or guardians of the Victim and the Perpetrator 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/guardians must comply with applicable Massachusetts and federal privacy laws and regulations, including the Massachusetts Student Records Regulations, 603 CMR 23.00, and the Federal Family Educational Rights and Privacy Act Regulations, 34 CFR Part 99, as set forth in 603 CMR 49.07, to the extent applicable to a Catholic, non-public school. Because of the legal requirements regarding the confidentiality of student records, the Head of School cannot report specific information to the Victim's parent or guardian about the disciplinary action taken unless it involves a "stay away" order or other directive that the Victim must be aware of in order to report violations.

L. Responses to Bullying.

- a. Teaching Appropriate Behavior Through Skills-building - Upon the Head of School determining that bullying or retaliation has occurred, the law requires that All Saints Academy use a range of responses that balance the need for accountability with the need to teach appropriate behavior. Mass. Gen. Laws. Ch. 71, Section 37O (d)(v). Skill-building approaches that the Head of School or designee may consider include:
 - 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 guidance counselors and other appropriate school 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; and making a referral for evaluation.

M. Taking Disciplinary Action

- a. If the Head of School or designee decides that disciplinary action is appropriate, the disciplinary action will be determined on the basis of facts found by the Head of School, 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 All Saints Academy's Code of Conduct.

- b. Disciplinary procedures for students with disabilities may be governed by the federal Individuals with Disabilities Education Improvement Act (IDEA), which should be read in conjunction with Massachusetts laws regarding student discipline, to the extent either is applicable to a Catholic, nonpublic school.
 - c. Due to the serious nature of the bullying, cyber-bullying and retaliation, significant time and resources will be spent to address all reports. If the Head of School determines that a student knowingly makes a false accusation of bullying, cyber-bullying or retaliation, they may face disciplinary sanctions that may include suspension and/or expulsion.
- N. Promoting Safety for the Victim and Others
- a. The Head of School will consider what adjustments, if any, are needed in the school environment to enhance the Victim's sense of safety and that of others as well. One strategy that the Head of School 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.
 - b. Within a reasonable period of time following the determination and the ordering of remedial and/or disciplinary action, the Head of School or designee will contact the Victim to determine whether there has been a recurrence of the prohibited conduct and whether additional supportive measures are needed. If so, the Head of School or designee will work with appropriate School Staff to implement them immediately.

VIII. Collaboration with Families

- A. Parent/guardian education and resources. All Saints Academy engages and collaborates with students' families to increase its capacity to prevent and respond to bullying. The Head of School and/or his/her designee holds meetings with all students the first few weeks of school to review the Bullying Prevention and Intervention Plan in age appropriate language. Students are encouraged and expected to discuss this topic with the parents/guardians. Each year, by the end of the first full week of school all students and parents/guardians are required to sign that they have read, understood and discussed the Plan at home. Each year, All Saints Academy offers educational 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. This includes programs designed to understand the dynamics of bullying, online safety and cyber-bullying. These programs are offered in collaboration with the Parent Organization, the District Attorney's Office, or other organizations that specialize in provide bullying prevention training for families.
- B. Notification requirements. The school will send parents/guardians written notice each year about the student-related sections of the Plan and the school's Internet safety policy. All notices and information made available to parents or guardians will be in hard copy or in electronic format on the school web site, provided notice of such availability on the web site is given by hard copy, and will be available in the language(s) most prevalent among parents or guardians.
- C. All Saints Academy will post the Plan and related information on its website as mandated by Mass. Gen. Laws Chapter 71, Sec. 37O(e)(3).

IX. Relationship to Other Laws

- A. Consistent with Massachusetts and federal laws, and the policies of the school, nothing in the Plan prevents the School from acting to remediate discrimination or harassment based on a person's membership in a legally protected category under local, Massachusetts, or federal law, or school policies.
- B. In addition, nothing in the Plan is designed or intended to limit the authority of the school to take disciplinary action or other action in accordance with the school's contract with the parents, guardians and students and/or under applicable law or the school's policies in response to violent, harmful, or disruptive behavior, regardless of whether the Plan covers the behavior, subject to Mass. Gen. Laws Chapter 71, Section 37O (d)(v)'s provision that such disciplinary actions shall balance the need for accountability with the need to teach appropriate behavior.
- C. In no event should the Plan be construed in any way so as to limit or modify the obligation of mandated reporters to timely make required so-called 51A Reports where required by M.G.L. Chapter 119, Section 51A et seq. as same may be amended from time to time or any successor statute to same.