

VENERINI ACADEMY [DRAFT 7-24-14]

BULLYING PREVENTION AND INTERVENTION PLAN

I. Introduction.

Venerini Academy (the “School”) 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, the School 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 the School’s ability to educate its students in a safe and embracing environment. The School’s Staff is expected to demand that all students behave appropriately and treat others with civility and respect. Bullying, Cyber-Bullying and Retaliation are not to be tolerated.

Accordingly, the School hereby promulgates this Bullying Prevention and Intervention Plan (the “Plan”) as required by the Roman Catholic Bishop of Worcester Bullying Prevention Policy (the “RCBW 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, lunch volunteer, 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:

- repeated 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, facebook, other social media sites 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, a student’s family member or a member of the school staff including, but not limited to, an educator, administrator, school nurse, lunch volunteer, custodian, bus driver, athletic coach, advisor to an extracurricular activity or paraprofessional who engages in Bullying or Retaliation.

“Plan”, a Bullying prevention and intervention plan established by a school.

“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, School nurses, lunch volunteers, 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 School 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 Head of School, Board of Trustees, teachers, School staff, professional support personnel, administrators, School’s attorney and any other stakeholders the Head of School deemed advisable. The Plan will be posted on the School’s website and will be included in the Parent/Student Handbook. From year to year the plan will be reviewed, amended and updated as needed. 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 Board of Trustees, are collectively responsible for setting priorities and for staying up-to-date with current 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 Diocese 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 the School'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 and revision process, School leaders, with input from the School community, the Staff and others mentioned above, will assess each year the adequacy of current programs; will review current policies and procedures; will review available data on Bullying and behavioral incidents; and will assess available resources including curricula and training programs. The “mapping” process will assist the School in identifying resource gaps and the most significant areas of need. Based on these findings, the School will revise and develop policies and procedures; will establish partnerships with the Diocese and community agencies, including law enforcement; and set priorities.

To become more aware of bullying incidents an environment of trust needs to be established

between students and their teachers so the students feel comfortable in reporting or discussing an alleged incident. Teachers and other staff member will look at areas of the school where bullying might occur, such as in the lunch room, carline, or at recess where students from various class levels may congregate. At staff meetings, members of the teaching staff will discuss and review various bullying allegations that have occurred. This process will be ongoing as events and occurrences will change throughout the year. The Head of School will receive copies of all Bullying allegations and will periodically review them to discern patterns and repeat offenders.

- B. Planning and oversight.** 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 Board of Trustees, is responsible for the implementation and oversight of the Plan.

If a Bullying incident has taken place, the student who was Bullied or someone else that witnessed the Bullying incident would inform the School staff member in charge, giving as many specific details as possible. A incident report will be completed and sent to the Head of School.

Even if the incident is resolved at the classroom level, a report will be filed with the Head of School. The report will describe details of the incident and the proposed resolutions. This report will allow the Head of School to follow its implementation.

Periodically, these reports will be reviewed to see where any improvements can be made to the current plan or if the plan in place is working. The reports will be recorded and tracked to better understand the weaknesses in the plan.

There will be a mandatory annual educational meeting for the School staff, parents and students to keep them up to date on the latest Bullying regulations and data. These meetings will allow our staff, School community to comment on or question this subject.

The School will do what is necessary to respond to the needs of the Victims and to educate and discipline the Perpetrators. Venerini Academy will ask our IT Company to review and implement an Internet safety policy.

A copy of this policy will be available for review. A link to the full report will be provided in the Parent/Student Handbooks.

- C. Priorities.** Flowing from the Veneirni Academy Mission Statement, the School expects that all members of the School community will treat each other in a civil manner and with respect for differences.

The School is committed to providing all students with a safe learning environment that is free from Bullying. This commitment, driven by the Venerini Academy Mission Statement,

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.

The School will take specific steps to create a safe, supportive environment for vulnerable populations in the School community, and provide all students with the skills, knowledge, and strategies to prevent or respond to Bullying.

Venerini 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. Venerini Academy will investigate promptly all reports and complaints of alleged Bullying and Retaliation and take prompt action to end that behavior and restore the Victim's sense of safety. Venerini Academy will support this commitment in all aspects of our School community, including curricula, instructional, co-curricular programs, Staff development, extracurricular activities, and parent or guardian involvement.

As stated in M.G.L. c. 71, sec. 37O as amended by Chapter 86 of the MA Acts of 2014, effective July 25, 2014 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:

- **Mandatory annual education for faculty, staff, parents and students that explain the nature of Bullying, new forms of Bullying with an opportunity to pose questions and address concerns.**
- **Age appropriate student assembly that defines and explains the nature of Bullying using concrete examples and role play.**
- **In accordance with the Venerini Academy Mission Statement, courteous and respectful behavior is reinforced each day throughout the School in Religion class, subject specific classes, at recess, in lunchroom and at all sports competitions.**
- **Respectful behavior will be modeled and exceptional behavior praised.**

Student behavior is monitored by teachers and assistants. Inappropriate behavior is handled in the following manner:

- **Teacher Assistants will address and correct inappropriate behavior and inform the student that his inappropriate behavior will be reported to the teacher.**
- **Teachers will address inappropriate actions, behaviors or language with**

the student or students involved and investigate the allegation to determine the severity of the incident. Students will be reprimanded and consequences of their actions will be determined by the severity of the incident.

- **More severe or repeated incidents will be reported to the Lead Teacher. The Lead Teacher will consult with the staff member that reported the incident. The incident will be further investigated by interviewing the students involved and their classmates. Parents will be notified when the situation warrants an intervention. They will be invited to meet with the Lead Teacher and all parties involved. A written summary of the incident will be submitted to the Head of School and kept on file along with a proposed resolution of the conflict.**
- **In the case of severe or repeated allegations the Head of School will intervene and continue the investigation. The Head of School will interview the students involved, their classmates, the teachers and the staff. The Head of School will invite parents to a meeting to present the findings and seek a resolution to the incident. Consequences will be presented by the Head of School to the Perpetrator and their family. Consequences may include a written or oral apology, guidelines for future conduct, suspension or expulsion. If the incident of Bullying has been proven, the student will be placed on probation until the following trimester.**

Nothing in this Plan alters the School's obligations to remediate any discrimination or harassment based on a person's membership in a legally protected category under local, Massachusetts or federal law.

IV. Prohibition Against Bullying and Retaliation.

Bullying is prohibited:

- On School Grounds owned, leased or used by a School;
- 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 the School; or,
- Through the use of technology or an electronic device owned, leased or used by the School;

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.** Even though it is not required for private Schools, the School will follow what is required in M.G.L. c. 71, sec. 37O(e)(2), annual training on the Plan shall be provided for all School Staff, parents and students; 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 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 designee shall provide written notice to the School Staff of the RCBW Policy and the Plan. Relevant sections of the RCBW Policy and the Plan relating to the duties of School Staff shall be included in the School employee handbook.
- C. Professional Development.** The goal 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.

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 the School 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; and
- maintaining a safe and caring classroom for all students.

VI. Access to Resources and Services.

Through the collaboration of the staff, the Head of School, the school nurse, chaplain or clergy member, Venerini Academy will tailor a plan that will include:

- Modeling of appropriate behaviors
- Yearly programs to educate the entire Venerini community concerning the nature of Bullying and the means to prevent it.
- Mission driven support to incorporate Christian values and respectful behaviors throughout the curriculum.
- Early intervention efforts on the part of teachers and support staff.
- Appropriate referrals to counseling and social service agencies.

Since the nature of each incident and the needs of each student vary, appropriate support staff will be engaged as needed. Names and contact information will be provided when requested.

A. Identifying resources/Counseling and other services. In an effort to provide counseling and other services for victims, perpetrators and their families, Venerini Academy will enlist the support of the Venerini community and local social service and health professionals:

- The Head of School
- Lead Teachers
- Support Staff
- School Nurse
- Chaplain or member of the clergy
- Specialized Healthcare professionals
- Diocesan and community agencies
- Local law enforcement agencies

- Members of the Friends of Venerini (parent association)
- Legal and paralegal professionals

B. Students with disabilities. As a private catholic elementary school that does not receive government funding for students with severe learning or behavior differences, Venerini Academy carefully screens its candidates for admission through an interview process and age appropriate placement testing. Therefore, the Board of Trustees and Head of School have agreed to admit only those students whom they feel will thrive with the limited academic and behavioral support that Venerini Academy can provide.

The needs of students with IEPs are carefully considered before students are accepted to ensure that Venerini Academy will be able to support their needs. Support might include but not limited to:

- Adapting the classroom learning environment to the students needs.
- Multisensory learning approaches to instruction.
- Appropriate extended time on tests, quizzes and written assignments where the needs has been documented.
- Additional instructional and behavioral supervision to accommodate a students academic needs and social awkwardness.
- Positive reinforcement of academic accomplishments and social growth to build confidence and independence.

C. Referral to outside services. The School has a referral protocol in place to help students and families access appropriate community services in a timely fashion:

- Chaplin or clergy member
- Specialized healthcare professionals
- Community service agencies
- Legal or paralegal professionals
- Local law enforcement agencies

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, lunch volunteer, custodian, bus driver, athletic coach, advisor to an extracurricular activity or paraprofessional, is required to report immediately to the Head of School or designee 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 available a Bullying Prevention and Intervention Incident Reporting Form (a copy of which is attached at the end of this Plan as **Exhibit A**). Use of an Bullying Prevention and Intervention Incident Reporting Form is not required as a condition of making a report. The School will: 1) make it available in the School's main

office, the School nurse's office, and other locations determined by the Head of School or designee; and 2) A Bullying Prevention and Intervention Incident Reporting Form will be posted on the School's website. The Bullying Prevention and Intervention Incident Reporting Form will be made available in English.

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. 37O(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.

Pursuant to Mass. Gen. Laws Chapter 71, Sec. 37O(e)(3): **The Plan will be posted on the school's website.**

A description of the reporting procedures and resources, including the name and contact information of the Head of School or designee, 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.

1. Reporting by Staff

A Staff member, including, but not limited to, an educator, administrator, school nurse, lunch volunteer, 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 or designee 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.

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

The School expects students, parents or guardians, and others who witness or become aware of an instance of suspected 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 or designee.

B. Responding to a report of Bullying or Retaliation.

1. Safety

Before fully investigating the allegations of suspected Bullying or Retaliation, the Head of School or designee 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.

The Head of School or designee will implement appropriate strategies for protecting from Bullying or Retaliation a student who has reported Bullying or Retaliation, a student who has witnessed Bullying or Retaliation, a student who provides information during an investigation, or a student who has reliable information about a reported act of Bullying or Retaliation.

2. Obligations to Notify Others

- a. Notice to parents or guardians. Upon determining that Bullying or Retaliation has occurred, the Head of School or designee 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.
- b. Notice to Another School. 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.
- c. Notice to Law Enforcement. 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 or designee deems appropriate (including, but not limited to, the Superintendent of Diocesan Schools, and if the Superintendent deems advisable, legal counsel for the Diocese).

- C. Investigation.** The Head of School or designee 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.

During the investigation the Head of School or designee will, among other things, interview students, Staff, witnesses, parents or guardians, and others as necessary. The Head of School or designee (or whoever is conducting the investigation) will remind the alleged Perpetrator, Victim, and witnesses that Retaliation is strictly prohibited and will result in disciplinary action.

Interviews may be conducted by the Head of School or designee, other Staff members as determined by the Head of School or designee, and in consultation with the School nurse, if appropriate. To the extent practicable, and given his/her obligation to investigate and address the matter, the Head of School or designee will maintain confidentiality during the investigative process. The Head of School or designee 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 or designee will consult with Superintendent of Diocesan Schools, and if the Superintendent deems advisable, legal counsel for the Diocese, about the investigation.

- D. Determinations.** The Head of School or designee will make a determination based upon all of the facts and circumstances. If, after investigation, Bullying or Retaliation is substantiated, the Head of School or designee 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 or designee will: 1) determine what remedial action is required, if any, and 2) determine what responsive actions and/or disciplinary action is necessary.

Depending upon the circumstances, the Head of School or designee may choose to consult with the students' teacher(s) and/or School counselor, 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.

The Head of School or designee 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 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 or designee 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.

E. Responses to Bullying.

1. Teaching Appropriate Behavior Through Skills-building

Upon the Head of School or designee determining that Bullying or Retaliation has occurred, the law requires that the School 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, age appropriate skill-building sessions based on the School's anti-Bullying curricula;
- providing relevant educational activities, explaining the definition and nature of bullying using examples and role playing, 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;
- provide an educational 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.

2. Taking Disciplinary Action

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 or designee, including the nature of the conduct, the age of the student(s) involved, and the need to balance accountability with the teaching of appropriate behavior. Discipline will be consistent with the Plan and with the School's code of conduct.

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, non-public school.

If the Head of School or designee determines that a student knowingly made a false allegation of Bullying or Retaliation, that student may be subject to disciplinary action.

3. Promoting Safety for the Victim and Others

The Head of School or designee 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 or designee 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 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.

Parents and guardians will be informed in writing about the student-related sections of the Plan.

- A. **Parent education and resources.** The School will offer an annual educational program 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 program will be offered in collaboration with the Friends of Venerini and the District Attorneys office. There are also pamphlets and brochures in the main office on Bullying that are available.
- B. **Notification requirement.** Venerini Academy community will directed to a link on the Venerini website where the entire Plan can be reviewed. Parents and guardians will be informed of the yearly grade appropriate Bullying Prevention presentations available.

The School 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.

Consistent with Massachusetts and federal laws, and the policies of the School, nothing in the Plan prevents the School from taking action 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.

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.

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.

EXHIBIT A

Diocese of Worcester

School _____

BULLYING PREVENTION AND INTERVENTION INCIDENT REPORTING FORM

1. Name of person filing the report: _____

Date: _____

(Note: Reports may be made anonymously, but no disciplinary action will be taken against an alleged aggressor solely on the basis of an anonymous report)

2. You are the: Target of the behavior

Reporter (not the target)

3. You are a: Staff member (specify role) _____

Administrator

Other (specify) _____

Your contact information and telephone number: _____

4. If staff member, state your role at time of incident:

5. Information about the incident:

Name of Target: _____

Name of Aggressor: _____

Date(s), Time, and Location of Incidents:

Location of Incident (be as specific as possible):

6. Witnesses (list people who saw the incident or have information about it):

Name: _____

Student Staff Other _____

Name: _____

Student Staff Other _____

Name: _____

Student Staff Other _____

7. Describe the details of the incident (including names of the people involved, what occurred, and what each person did and said – including specific words used). Please use additional space on the back if necessary.

Diocese of Worcester

School _____

INTERVIEW INFORMATION FORM

Date of Incident:

AGGRESSOR

TARGET

WITNESS

Completed by _____ Date: _____
Diocese of Worcester School _____

FOR ADMINISTRATIVE USE ONLY

8. Signature of person filing this report: _____
Date: _____
9. Form given to: _____ Position: _____
Date: _____

INVESTIGATION Date report forwarded to principal: _____

1. Investigator(s): _____
2. Position(s): _____
3. Interviews:
 - Interviewed aggressor
Name: _____ Date: _____
 - Interviewed target
Name: _____ Date: _____
 - Interviewed witnesses
Name: _____ Date: _____
4. Any prior documented incidents by the aggressor? Yes No
If yes, have the incidents involved the target previously? Yes No
Any previous incidents with findings of bullying, retaliation? Yes No

3. Action taken:

- Loss of privileges
- Suspension (in school/out of school)
- Expulsion
- Other (specify)

Follow up with target scheduled for _____ Initial and date when
completed _____

Follow up with aggressor scheduled for _____ Initial and date when
completed _____

Signature: _____

Title: _____

Person filing report: _____

Position: _____