

**Cotting School
Bullying Prevention and
Intervention Plan**

Revised October 2019

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Introduction

Cotting School, a Chapter 766 approved private day school, provides comprehensive programs for students from ages 3 to 22, with physical, medical, cognitive, communication and other challenges to learning. All of the students enrolled at Cotting have documented disabilities and an Individualized Education Program (IEP). Cotting School offers individualized academic, prevocational, and social experiences to strengthen skills, build confidence and enhance self-image. Instruction is carried out in small classes, small groups, and on an individual basis in a manner most supportive of each student's learning style. The curriculum is geared to offer each student a range of attainable goals for future educational, vocational, and living experiences upon completion of the program. Each Cotting School staff member shares the comprehensive responsibility for conveying to each student academic knowledge, social values, and appropriate behavior within an appropriately structured milieu. The School is committed to providing each student with the requisite cognitive and social skills for success in their communities and in the future.

Cotting students present with a wide range of needs and abilities, and as such, each student's educational program is individualized to the greatest extent possible. Students' IEP goals and objectives outline target academic and therapeutic areas and form the basis for their educational program. Most students are working towards improving social interaction skills and their ability to communicate in socially acceptable and age appropriate ways. For many students, this includes the ability to initiate conversation, take conversational turns, maintain eye contact, improve topic maintenance, and switch topics appropriately. Other students need support to learn to recognize and interpret non-verbal aspects of social interaction such as body language, tone of voice, facial expressions, and personal space. Social problem solving skills, such as negotiating an activity with peers or making compromises, are also addressed so that students learn to have successful and positive interactions and develop friendships. Students are provided with specific skills sets that enable them to participate in a variety of social situations at school, at home, and in the community.

Cotting School is unable to meet the needs of children who present with severe behavioral or emotional difficulties. However, we recognize that all students may require emotional and/or behavioral support at different times during their development. To meet these needs, Cotting has a Mental Health Team (MHT) consisting of a school psychologist, guidance counselors, medical department team leader, and the Family Support Coordinator. The Mental Health Team provides support to students and staff and ensures that emotional needs of students are being monitored and met. Counseling is provided individually or in small groups and focuses on issues of self-esteem and/or social skills training. These are areas

that are vital to adjustment of students with disabilities. Individuals and/or small groups also meet regarding issues of coping with disabilities, chronic illness, death and dying, and other issues that affect the emotional adjustment of children with serious physical or medical challenges.

The *Cotting School Bullying Prevention and Intervention Plan* was designed in keeping with the particular needs and challenges of our specific student population. As with all aspects of our program, it should be considered within the context of the students and community it was designed to serve.

Position Statement

Cotting School is committed to providing all students with a safe learning environment that is free from bullying, cyber-bullying, and retaliation. The *Cotting School Bullying Prevention and Intervention Plan* affords protection to all students, regardless of their legal status. We expect all members of our community to follow the Guiding Principles outlined below:

Guiding Principles:

- All students have the right to a safe school environment that is free from bullying or harassment.
- We are committed to teaching our students pro-social behaviors that serve to prevent them from exhibiting aggressive behaviors and protect them from unwanted behaviors that are directed toward them.
- When a situation of bullying or suspected bullying occurs, we will seek out and use our internal and external resources to develop peaceful and useful solutions.
- Each member of our community is deserving of and has the right to be treated with respect.
- We seek to encourage the best from one another and build bridges instead of walls.
- We are all teachers, models, and mentors for our students in our ability to problem solve, compromise, and deal with conflict productively and positively.
- We believe that honest and open communication is essential for the success of our students. This can only happen in an environment where it is safe to share ideas and perspectives.

These principles set a standard for behavior and interaction in our community and are an integral part of our goal to provide a safe learning environment and to prevent and eliminate all forms of bullying, cyber-bullying, and retaliation.

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

We recognize that certain students may be more vulnerable to become targets of bullying, harassment, or teasing based on actual or perceived characteristics, including race, color, religion, ancestry, national origin, sex, socioeconomic status, homelessness, academic status, gender identity or expression, physical appearance, 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 one or more of these characteristics. It is important to note that **all students who attend Cotting School have identified disabilities**. Therefore our environment is especially attuned to and prepared to address the needs of vulnerable populations.

Cotting School's Bullying Prevention and Intervention Plan is a comprehensive approach to addressing bullying, cyber-bullying, and retaliation. Cotting is committed to working with students, staff, families, law enforcement agencies, and the community to prevent issues of violence and promote a safe, respectful learning environment. The Chief Academic Officer or her designee is responsible for the implementation and oversight of the Plan except when a reported bullying incident involves the CAO or her designee as the alleged aggressor. In such cases, the Executive Director or designee shall be responsible for investigating the report, and other steps necessary to implement the Plan, including addressing the safety of the alleged victim. If the Executive Director is the alleged aggressor, the Board of Trustees, or its designee shall be responsible for investigating the report, and other steps necessary to implement the Plan, including addressing the safety of the alleged victim.

Definitions:

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

- i. on school grounds and property immediately adjacent to school grounds, at a school-sponsored or school-related activity, function, or program whether on or off school grounds, at a school bus stop, on a school bus or other vehicle owned, leased, or used by a school district or school; or through the use of technology or an electronic device owned, leased, or used by a school district or school, and

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

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

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

- i. Causes physical or emotional harm to the target or damage to the target's property
- ii. Places the target in reasonable fear of harm to himself or herself or of damage to his or her property
- iii. Creates a hostile environment at school for the target
- iv. Infringes on the rights of the target at school
- v. Materially and substantially disrupts the education process or the orderly operation of a school.

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

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

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

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

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

Reporting Process:

The following steps outline the process for reporting bullying, cyber-bullying, or retaliation for both student and staff aggressors:

1. Reports can 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 is required to report immediately to the Chief Academic Officer or designee any instance of bullying or retaliation the staff member becomes aware of or witnesses. When the CAO or her designee is the alleged aggressor, reports can be made to the Executive Director or designee, or to the Board of Trustees or designee when the Executive Director is the alleged aggressor.
2. Reports should be made to the Chief Academic Officer. In the absence of the Chief Academic Officer, reports can be made to the Director of Post-Secondary Pathways, Curriculum Specialist, or the Special Education Coordinator. When the CAO or her designee is the alleged aggressor, reports can be made to the Executive Director or designee or to the Board of Trustees or designee when the Executive Director is the alleged aggressor.
3. Faculty, staff, and others who are reporting the instance of bullying should fill out the *Harassment/Bullying Incident Report Form*, however completion of the form is not a requirement for making a report. Alternately, the reporter can request to speak directly with the Chief Academic Officer or designee, who will then complete the form with the information provided. When the CAO or her designee is the alleged aggressor, reports can be made to the Executive Director or designee or to the Board of Trustees or designee when the Executive Director is the alleged aggressor.
4. Parents can contact the Chief Academic Officer or another administrator to report an incident of bullying. When the CAO or her designee is the alleged aggressor, parents can contact the Executive Director or designee, or to the Board of Trustees or designee when the Executive Director is the alleged aggressor.
5. Parents will have access to the reporting form on the school's website and in the Parent Handbook.
6. Students will be encouraged to make reports of bullying to a teacher, therapist, administrator or other trusted adult at school. They may also report to their parents who would then make a report to the school. Many of our students would not be able to fill out the incident report form. In this case, the administrator taking the report would complete the form.
7. All reports of bullying can be made anonymously. It should be noted that no disciplinary action would be taken against a student solely on the basis of an anonymous report. Confidentiality will be respected in the reporting process to the greatest extent possible.

Investigation

1. An investigation will be conducted immediately, or within one school day, after any report of bullying, cyber-bullying, or retaliation.
2. An immediate determination of safety will be made for the reported target.
3. All relevant parties, including parents or guardians of both student aggressors and targets will be notified.
4. Sending school districts will also be notified.
5. All relevant parties will be interviewed directly and immediately.
6. Confidentiality will be maintained to the greatest extent possible.
7. Written documentation will be kept of the investigation, interviews, and all findings.
8. Results of findings from an investigation will be reported back to all relevant parties, keeping in mind relevant privacy laws and regulations.

Investigative Findings

1. False Accusations: Disciplinary action will be taken against any student who knowingly makes a false accusation of bullying, cyber-bullying, or retaliation.
2. Negative Findings: If the findings of the investigation are “negative,” meaning that no evidence of bullying has occurred, results will be communicated to all relevant parties. The investigation and its outcome will be documented.
3. Positive Findings: If the findings of the investigation are "positive", meaning that it is found that bullying has occurred, we will provide consequences and supports for the aggressor and supports for the target. Consequences/actions will be proportional to the behavior exhibited.

Problem Resolution System

The CAO or designee shall inform the parent or guardian of the target about the Department of Elementary and Secondary Education’s problem resolution system and the process for accessing that system, regardless of the outcome of the bullying determination. This information will be made available in both hard copy and electronic formats. Any parent wishing to file a claim/concern or seeking assistance outside of the district may do so with the Department of Elementary and Secondary Education Program Resolution System (PRS). That information can be found at: <http://www.doe.mass.edu/pqa>, emails can be sent to compliance@doe.mass.edu or individuals can call 781-338-3700.

Taking Appropriate Action

The following actions may be taken in response to an incident of bullying, cyber-bullying, or retaliation:

1. Emergency convening of the IEP teams (separately) of the relevant students to determine what adjustments, supports, or accommodations need to be made, if any, to their IEPs to support the student. The impact of the student's disability on the incident will be carefully considered.
2. Individual support/counseling will be provided for the student aggressor, target, and appropriate family members of these students, utilizing Cotting's School Psychologist and Guidance Counselors where appropriate. For student aggressors, emphasis will be placed on increasing appropriate behavior and increasing awareness of the impact of behaviors on others. For targets, emphasis will be placed on restoring a sense of safety and security as well as positively reinforce the right for all students to self-advocate and report unsafe behaviors.
3. Referrals may also be made to outside therapists as needed. Cotting make recommend more comprehensive evaluation from other mental health professionals. The Family Support Coordinator will be a resource in these instances. Family counseling may also be recommended depending on the circumstances.
4. A student aggressor may be removed from extra-curricular activities, such as sports, after school classes, the Senior Class Trip, etc., as appropriate.
5. Extra supervision will be provided to ensure there are no recurrences of aggression. If a student needs 1:1 supervision, additional staffing supports will be discussed with the sending school district as appropriate and via a Team meeting.
6. Disciplinary action up to and including termination of employment will be taken against any staff member found to be an aggressor in a report of bullying.
7. Law enforcement will be notified immediately if in the course of our investigation we discover a crime has been committed.

Intervention

When we determine bullying has occurred we will begin:

1. Offering individualized skill-building sessions based on the school's anti-bullying curricula

2. Providing relevant educational activities for individual students or groups of students, in consultation with guidance counselors and other appropriate school personnel
3. Implementing a range of academic and nonacademic positive behavioral supports to help students understand pro-social ways to achieve their goals
4. Meeting with parents and guardians to engage parental support and to reinforce the anti-bullying curricula and social skills building activities at home
5. Adopting behavioral plans to include a focus on developing specific social skills
6. Making a referral for evaluation as needed.

Suspension and Termination

In some situations it may be appropriate to suspend a student from school because of an act of bullying, cyber-bullying, or retaliation. All Department of Elementary and Secondary Education regulations will be followed with regard to suspension as follows:

3-5 Day Suspensions

When a student's behavior endangers the health and safety of him/herself or others, or causes a substantial disruption of the School's program, the School may suspend or dismiss the student from the total program. Such suspension will have the following limits and requirements.

- Whenever a student is suspended, the School will notify the parent(s) and the public school and/or the human service agency responsible for placement. Within 24 hours a written statement explaining the reason(s) for suspension will follow this notification to both the public school and the parent(s). The Chief Academic Officer and the Special Education Coordinator will be responsible for communicating with all appropriate parties.
- No student will be suspended and sent home unless a responsible adult is available to receive the child.
- If a student is suspended for more than three (3) consecutive school days or five (5) non-consecutive school days in a school year, the Special Education Coordinator will meet with the public school district liaison and the parents within five (5) school days of the final suspension. At this meeting the parties will consider alternative measures plus possible resolutions to those issues concerning the student, as well as the possibility of alternative placement.
- Sending a student home "early" or an "in-school suspension" of a student who is not receiving instruction from either a licensed teacher or a

paraprofessional who is being supervised by a licensed teacher is considered a suspension

- The student, if 14 years of age or over, shall be notified by the School of his/her right to be present and participate in such a meeting.
- Cotting School considers suspension a disciplinary action for severe infractions that require careful assessment. If suspension is to be considered, a meeting will be held with the Chief Academic Officer or Special Education Coordinator to determine if suspension is warranted and if so, if the action is in the best interest of the student. Cotting School may decide not to suspend a student if such a step has no value as a learning tool or if the action would, in the long run, create an adverse effect.
- Suspensions will be recorded and the number and duration of suspensions, including suspensions from any part of the student's IEP program (including transportation) will be tracked. Records will be maintained and monitored in the Student Services Office by the Chief Academic Officer.

10+ Day Suspensions

Cotting School implements the following procedures when suspensions exceed 10 consecutive school days or a pattern has developed for suspensions exceeding 10 cumulative days.

Cotting School will make a request of the student's responsible school district to convene an IEP Team meeting, which includes representation from Cotting School, prior to a suspension that constitutes a change in placement of a student with disabilities.

Cotting School will participate in the Team meeting:

- To develop or review a functional behavioral assessment of the student's behavior and to develop or modify a behavior intervention plan
- To identify appropriate alternative educational setting(s)
- To conduct a manifestation determination (i.e. to determine the relationship between the disability and the behavior). To do this, the Team asks questions including: *Is the IEP appropriate? Is the placement appropriate? If there was a behavior plan, was it implemented? Does the student understand the impact and consequences of his/her behavior? Can the student control his/her behavior?*

If the team determines that the behavior is NOT a manifestation of the disability, the school may suspend or terminate the student consistent with policies applied to any other student in the program. The responsible school

district must, however, offer an appropriate education program to the student with disabilities that may be in some other setting.

If the Team determines that the behavior IS a manifestation of the disability, the placing district, in coordination with the private school, takes steps (with consent of the parent) to modify the IEP, the behavior intervention plan and/or the placement.

Suspensions will be recorded and the number and duration of suspensions, including suspensions from any part of the student's IEP program (including transportation) will be tracked. Records will be maintained and monitored in the Student Services Office by the Chief Academic Officer. When suspensions exceed 10 consecutive school days or a pattern has developed for suspensions exceeding 10 cumulative days Cotting School will request a Team meeting to discuss a change in placement. The Chief Academic Officer and the Special Education Coordinator will be responsible for communicating with all appropriate parties.

Upon admission of a student, Cotting School provides a written policy on suspensions to the parents and to the school district and/or human service agency that placed the student.

Emergency Termination

If assurance cannot be made that behaviors endangering the health and safety of the student or others will not recur, Cotting School will seek an immediate emergency discharge of the student from the program. Parents of the student must agree that return to and continued placement at Cotting School is contingent upon a behavior plan developed and accepted by the parents, the LEA and Cotting School.

It is the policy of Cotting School to approach a student's termination in a consistent and deliberate fashion. Given the overall needs of the population served by Cotting, planning and predictability are essential in order to maximize a student's potential for success.

- a. For planned terminations, Cotting School will notify the public school district of the need for an IEP review meeting and provide notice of this meeting to all appropriate parties ten (10) days in advance of the intended date of the meeting. The purpose of the meeting will be to develop a clear and specific termination plan for the student that shall be implemented in no less than thirty (30) days unless all parties agree to an earlier termination date.

- b. The plan for termination will include recommendation and provisions for appropriate services in the student's new environment. The person responsible for providing these services will be identified.
- c. Following a student's termination, a written discharge summary will be developed specifying the factors leading to discharge, identifying specific needs and recommending appropriate services.

If Cotting School determines that emergency circumstances exist which warrant an unplanned termination of the student, the school will take the following steps to ensure that the termination process is consistent with the procedures under 603 CMR 28.09(12)(b). "Emergency Circumstances" are defined as circumstances in which the student presents a clear and present threat to the health and safety of himself/herself or others. In the case of an unplanned termination, Cotting School will:

- Immediately notify the parents, Department of Elementary and Secondary Education (DESE), the local administrator of Special Education and officials of all appropriate human service agencies responsible for the placement of the emergency circumstances that the school believes warrant an unplanned termination of the student
- With the public school system, arrange for a TEAM meeting to be conducted in accordance with 603 CMR 28.09(12)(b)
- If feasible, at the request of the public school district, the program may delay termination of the student for up to two (2) calendar weeks to allow the public school district the opportunity to assume responsibility for the student and to convene an emergency TEAM meeting or to conduct other appropriate planning discussions prior to the student's termination. Cotting School will not terminate the enrollment of any student, even in emergency circumstances, until the enrolling public school district is informed and assumes responsibility for the student.
- With mutual agreement between the public/private special education and the placing public school district, termination may be delayed for longer than two (2) calendar weeks
- The Cotting School will provide information and assistance necessary for public school officials to implement their responsibilities under 603 CMR 28.09(12)(b) Regulation in terminating the student's placement
- The school will participate in meetings and provide information, as appropriate, relative to the student's needs and recommendation for future placement
- The Department of Elementary and Secondary Education Incident Report form (Form 2) will be completed, submitted through WBMS and a written summary attached for distribution to parents, DESE, the SPED administrator of the public school and other involved agencies.

Supports for the Target

To ensure that any students who are targets in an incident of bullying, harassment or retaliation return to a sense of safety and security within the school environment, the following steps will be taken:

1. The School Psychologist or Guidance Counselor will provide individual counseling, as appropriate. These mental health professionals, in consultation with the student's teachers, parents/guardians, and outside therapists as appropriate, will assess the target's needs and determine what supports would be beneficial to the target. This assessment will occur immediately following the incident, and then at regular intervals as appropriate to ensure there are no latent effects of the incident.
2. The student's IEP will be amended if needed, to include regular and ongoing counseling services or other support services. If the student requires services not available at Cotting, we will work with the sending school district to determine the best way to meet the student's needs.
3. Referrals for outside therapy and/or evaluation will be provided when needed and appropriate.
4. The Chief Academic Officer or designee will meet with the student's parents/guardians to develop a consistent plan for supporting the student at school and carryover at home. In addition, a plan for regular communication about the student's emotional state at school and home will be established.
5. Members of the student's Cotting team will be notified and updated about ways to support the student at school. These could include strategies such as using social stories, providing extra time for relaxation or breaks, using calming strategies such as sensory activities, or helping the student to monitor their level of anxiety or stress.
6. Close supervision will be provided in any setting where the aggressor and target are engaged in common activities.
7. Parents of the target will be notified if the target and aggressor sign up for the same after school events or activities.
8. The appropriate administrators will follow up with teachers and therapists during supervision to ensure that the target is receiving the designated supports throughout the program and across settings.

Protection for Reporters/Witnesses/Interviewees

Confidentiality will be protected to the greatest extent possible for all reporters, interviewees, and witnesses of bullying, cyber-bullying, and retaliation. The Chief Academic Officer or her designee will be responsible for ongoing follow up and supervision regarding the status of witnesses and/or reporters. Any act of retaliation against a witness, interviewee or reporter, will result in a full investigation following the procedures outlined above. Appropriate disciplinary actions will be taken immediately.

Communication

Collaboration with Parents

Cotting has and will continue to include families in our developing our response to bullying. We will communicate about the curricula we are using, how parents can support our efforts at home, and dynamics of bullying, cyber-bullying, and online safety. Parents and guardians will be notified in writing each year about the student-related sections of the Bullying Prevention and Intervention Plan.

Parent Education and Resources

Cotting 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. These may include:

- Parent coffees
- Parent Advisory Committee presentations and meetings
- Annual letter from Health class instructors
- Back to School Night presentation
- Distribution of the Parent Handbook
- Access to the *Cotting School Bullying Prevention and Intervention Plan* on the school website
- Annual Internet Safety policy distribution

Notification Requirements

Each year Cotting 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 cyber-bullying and online safety. Cotting will send parents written notice each year about the student-related sections of the Plan and the school's Internet safety policy.

Notification of Incidents

The Chief Academic Officer or her designee will notify parents/guardians of both targets and student aggressors immediately following a report of an incident of bullying. Parents/guardians will also be notified, orally and in writing, of the outcome of any investigation of bullying, cyber-bullying, or retaliation, within the limits of student privacy laws.

Included in notification to the parents/guardians of student aggressors will be the disciplinary actions taken, actions to prevent further incidents, supports provided for the aggressor, and a plan for communication between the parents/guardians and the school. Notification to parents of targets will include actions to prevent further incidents, supports provided for the target, and a plan for communication between the parents/guardians and the school.

Parents/guardians of both student aggressors and targets will also be notified of any reports to law enforcement when criminal charges may be pursued against the aggressor.

Reporting Requirements

Cotting School will report bullying incident data to the Department of Elementary and Secondary Education on an annual basis.

Professional Development

Cotting will include specific, ongoing training at Orientation, Professional Development Days, and during designated Wednesday afternoon professional development times throughout the year. The goal of the professional development activities is to build the skills of all staff members including teachers, administrators, therapists, nurses, paraprofessionals, cafeteria workers, custodians, and all other staff. *Cotting School's Bullying Prevention and Intervention Plan* will be available to all staff in the Policies and Procedures Handbook.

Annual training for all school staff on the Plan will include staff duties under the Plan, an overview of the steps that the Chief Academic Officer 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 program levels. Cotting will provide all staff with an annual written notice of the Plan including sections related to staff duties and bullying of students by school staff, in the Policies and Procedures Manual

As required by M.G.L. c. 71, § 370, the content of the professional development activities will include information on:

- i. Developmentally or age-appropriate strategies to prevent bullying
- ii. Developmentally or age-appropriate strategies for immediate, effective interventions to stop bullying incidents
- iii. Information regarding the complex interaction and power differential that can take place between and among an aggressor, target, and witnesses to the bullying

- iv. Research findings on bullying, including information about specific categories of students who have been shown to be particularly at risk for bullying in the school environment
- v. Information on the incidence and nature of cyber-bullying
- vi. 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 that must be considered when developing students' Individualized Education Programs (IEPs). This will include a particular focus on the needs of students whose disability affects social skills development.

Additional areas identified for professional development include:

- Social skill development in students with complex disabilities
- Self-advocacy skills for student with cognitive and developmental challenges
- Safety in the community for student with multiple disabilities
- 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.
- Engaging staff and those responsible for the implementation and oversight of the Plan to distinguish between acceptable managerial behaviors designed to correct misconduct, instill accountability in the school setting, etc. and bullying behaviors

Strategies for Intervention

Needs Assessment

At least once every four years beginning with 2015-16 school year, Cotting School will administer a Department of Elementary and Secondary-developed student survey to assess school climate and the prevalence, nature, and severity of bullying in our schools. This survey will be modified as needed to make it accessible to students using assistive technology or other supports. The goal of the survey will be to gather information on school climate and school safety issues and to collect data

on the prevalence and characteristics of bullying. This information will help to identify patterns of behaviors and areas of concern, and will inform decision-making for prevention strategies including, but not limited to, adult supervision, professional development, age-appropriate curricula, and in school support services. A variation of the student survey will be used with faculty, staff, and parents/guardians to assist in determining school climate needs.

Specific bullying prevention approaches.

Bullying prevention curricula, including the Circles Curriculum, will be used with our students. The Circles Program teaches social distance and levels of intimacy through the use of six color-coded concentric circles.

Starting from the center Purple Private circle, which is the self, each new colored circle represents behaviors, feelings, and actions appropriate to the distance from the center, or self.

The Circles Program assists students in discriminating different degrees of intimacy and to adapt their behaviors accordingly. The program teaches students how relationships can be formed and maintained according to acceptable social norms. Thus, the Circles Program lays the foundation for people with social deficits due to their disabilities to manage the amount of personal responsibility and social integration in their lives.

The program consists of video programs, discussion, and activities and role-plays designed to teach social distance. It explores the level of intimacy between people in the way that they TOUCH, TALK to and TRUST each other. Students will learn "relationship boundaries" and relationship-specific behaviors. Understanding what unwanted behavior is from the perspective of others is helpful in preventing behavior that may lead to taunting, mocking or bullying.

The Zones of Regulation curriculum was developed by an occupational therapist and is an emotional regulation framework to teach students to identify and manage feelings. Incorporating social perspective taking, concepts associated with cognitive-behavioral therapy, self-regulation, executive functioning, and sensory processing, this curriculum teaches students to categorize emotional states and express emotions in ways that fit social expectations. Students develop an individualized toolbox to cope with and manage the expression of emotions in each zone. All Cotting direct care staff receive training in understanding the Zones of Regulation and identifying ways to incorporate this framework into daily work with students. The curriculum has been introduced to students through health, speech/language and occupational therapy groups. Additionally, a set of mini-lessons was developed to aide teachers at various levels in implementing this framework within the

classroom setting. Parent workshops on the Zones of Regulation program are also offered.

Because a specific research and evidence-based bullying curriculum for students with severe cognitive impairments does not exist, we will use our current curriculum to emphasize:

- Using scripts and role plays to develop skills
- Empowering students to take action by knowing what to do when they witness other students or staff engaged in acts of bullying or retaliation, including seeking adult assistance
- Helping students understand the dynamics of bullying and cyber-bullying, including the underlying power imbalance
- Emphasizing cyber-safety, including safe and appropriate use of electronic communication technologies
- Enhancing students' skills for engaging in healthy relationships and respectful communications
- Engaging students in a safe, supportive school environment that is respectful of diversity and difference.

General Teaching Approaches that Support Bullying Prevention Efforts

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

- 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.

Appendix A
Cotting School
Harassment/Bullying Incident Report Form

Aggressor Name (s):
Classroom:

Target Name (s):
Classroom:

Room/Location:

Type of Harassment alleged:

Racial: _____ Religious: _____ Gender/Sexual Orientation _____ Disability _____
Other: _____

Check all spaces below that apply:

<input type="checkbox"/> Name calling	<input type="checkbox"/> Stalking	<input type="checkbox"/> Inappropriate gesturing
<input type="checkbox"/> Staring/leering	<input type="checkbox"/> Writing/graffiti	<input type="checkbox"/> Threatening
<input type="checkbox"/> Taunting/ridiculing	<input type="checkbox"/> Inappropriate touching	<input type="checkbox"/> Spitting
<input type="checkbox"/> Demeaning Words	<input type="checkbox"/> Stealing	<input type="checkbox"/> Damaging property
<input type="checkbox"/> Shoving/pushing	<input type="checkbox"/> Hitting/kicking	<input type="checkbox"/> Flashing a weapon
<input type="checkbox"/> Intimidation/extortion		

Other _____

Describe the incident:

Names of Witnesses present (if any):

Physical evidence:

Graffiti _____ Notes _____ E-mail _____ Web sites _____ Video/audio tape _____

Other _____

Reporter(s) Name and Signature: _____

Name of Parent(s) contacted:

Date _____

Time _____

Name (s) of Administrative Investigator (s)

Response taken (including supports and or consequences):