IX. BULLYING PREVENTION AND INTERVENTION PLAN

I. Introduction

Belmont Hill School is a community dedicated to developing boys in mind, body, and spirit. To that end, Belmont Hill is committed to providing an environment that is free of bullying. Maintaining a safe, supportive, and respectful learning environment is central to the School’s mission of striving to foster in each boy good character, commitment to service, global responsibility, and a passion for lifelong learning.

Belmont Hill strives to provide and sustain an atmosphere that is free of any verbal, physical or emotional misconduct that might disrupt the learning environment or make it unsafe. The Belmont Hill School Bullying Prevention and Intervention Plan (the “Plan”) set forth below aligns our School mission and our core community principles with the Massachusetts law against bullying. The Plan is an integral part of our ongoing efforts to promote a respectful and healthy community, and to prevent and address behavior that can impede any aspect of the learning process. The Plan details Belmont Hill’s comprehensive approach to preventing and responding to incidents of bullying, cyber-bullying, and retaliation.

The School recognizes 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, 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.

This Plan is consistent with Belmont Hill’s policies regarding Community Tenets and Standards, including Compliance with Massachusetts laws, which appears in the School’s Student-Parent Handbook and our Faculty/Staff Handbook, as well as with the School Honor Code.

The Head of School is responsible for the communication, implementation, and administration of the Plan. Questions and concerns related to this Plan may be referred to the Head of School, the Director of the Middle School, the Director of the Upper School, or the Director of Community and Diversity.
II. Definitions and Prohibition Against Bullying, Cyber-Bullying, and Retaliation

Definitions

As used in the Plan:

“Bullying” means the use by one or more students or faculty/staff, of a written, verbal, or electronic expression or a physical act or gesture or any combination thereof, directed at a targeted student that:

1. causes physical or emotional harm to the target or damage to the target’s property;
2. places the target in reasonable fear of harm to himself or of damage to his property;
3. creates a hostile environment at the School for the target;
4. infringes on the rights of the target at the School; or
5. materially and substantially disrupts the educational process or the orderly operation of the School.

“Cyber-bullying” means bullying through the use of technology or any electronic communication, including, but not 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, electromagnetic, photo electronic or photo optical system, including, but not limited to, electronic mail, internet communications, instant messages or facsimile communications. Cyber-bullying also includes: (a) the creating of a webpage or blog in which the creator assumes the identity of another person, and (b) the knowing impersonation of another person as the author of posted content or messages, if the creation or impersonation constitutes bullying conduct as defined above. Cyber-bullying also includes 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 included in the definition of bullying.

A “Hostile Environment” 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 or a member of the faculty/staff work experience.

“Retaliation” is any form of intimidation, reprisal, or harassment directed against any person who reports bullying, provides information during an investigation of bullying, or witnesses or has reliable information about bullying. Retaliation of any sort will not be permitted.
“Faculty/Staff” members include, but are not limited to, educators, administrators, counselors, school nurses, cafeteria workers, custodians, bus drivers, athletic coaches, advisors to extracurricular activities, support staff, and paraprofessionals.

A “Target” is a student, or a member of the faculty/staff, against whom bullying, cyber-bullying, or retaliation has been perpetrated.

Definitions and School Policy

It is important to bear in mind that stricter standards of behavior may apply under Belmont Hill’s policies in order to prevent inappropriate verbal and physical conduct before a target has been subject to bullying as it is defined under the law. For example, although the law defines bullying as “repeated use” of certain expressions, acts, and/or gestures, the School reserves the right to impose disciplinary measures or other corrective action in a case of a single expression, act or gesture, as well as in a case of inappropriate conduct that may not rise to the level of the legal definition of bullying. This may occur if the School determines that the behavior is of sufficient severity to warrant disciplinary measures or other remedial action, or if the repetition of an expression, act, or gesture might result in bullying as defined under the Massachusetts anti-bullying law.

Prohibition Against Bullying, Cyber-Bullying and Retaliation

Belmont Hill will not tolerate any form of bullying or cyber-bullying. We will also not tolerate any form of retaliation against someone who has reported a case of bullying or cyber-bullying, has provided information during the investigation of bullying, or has witnessed and/or has relevant information to support a report of bullying.

This policy applies to all of our students and faculty/staff; it also may apply if one of our current students is subjected to bullying by a former student who comes on school grounds or who engages in cyber-bullying against one of our current students.

Bullying and cyber-bullying are strictly prohibited on School grounds and at School-sponsored or School-related activities, events, functions and programs, including athletic practices and contests that occur at off-campus locations. Bullying and cyber-bullying are also prohibited on School buses, at School bus stops, on public transportation, on any other form of transportation owned, leased, used or provided by the School, on property immediately adjacent to School grounds, and through use of electronic devices owned (including the School’s network), leased or used by the School.
Bullying or cyber-bullying that occurs at a non-School sponsored activity, event, program, or location – and through use of technology or a device that is not owned, leased, or provided by the School – is prohibited if it creates a hostile school environment for a target, infringes on the rights of a target at School, or if it materially and substantially disrupts the educational process or the orderly operation of the School.

III. Prevention of Bullying, Cyber-Bullying, and Retaliation

Beginning with the admission process, Belmont Hill communicates to families our value of creating a safe, nurturing learning environment. Our mission calls on us to value differences and work together to create a healthy society. These values are essential to our creation of a community and are reinforced in a number of ways. It is expected that adults in the community will support the School in the enforcement of rules and behavioral expectations. Additionally, Belmont Hill’s student advisor system, community enrichment programs, School values, and student support services focus on the development of a cohesive and safe community in which all students share a sense of well-being and belonging.

In order to achieve the goals of preventing bullying, cyber-bullying, and retaliation, the School’s Bullying Prevention and Intervention Plan will be one of the required topics addressed by all students, faculty, and staff every year. More specifically, the School conducts an annual training for faculty/staff (and more often, as deemed necessary by the Head of School), which includes: (a) developmentally appropriate strategies to prevent bullying incidents; (b) developmentally appropriate strategies for immediate, effective interventions to stop bullying incidents; (c) information regarding the complex interaction and power differential that can take place between and among a perpetrator, victim and witnesses to the bullying; (d) research findings on bullying, including information about students who have been shown to be particularly at risk for bullying in the school environment; (e) information on the incidence and nature of cyber-bullying; and (f) internet safety issues as they relate to cyber-bullying.

IV. Reporting Incidents of Bullying, Cyber-Bullying and Retaliation

Students: Any student who has witnessed an incident of bullying or cyber-bullying, or otherwise has relevant information regarding bullying or cyber-bullying is strongly encouraged to report the matter verbally or in writing to the Director of the Middle School, the Director of the Upper School, the Director of Community and Diversity or to any other trusted Belmont Hill adult with whom the student is comfortable speaking. Oral reports made to a member of the faculty/staff will generally be memorialized in writing. Any student who is subject to retaliation, or who knows of another student who has been subjected to retaliation, is urged to
report it as soon as possible. Students who knowingly make false accusations of bullying or retaliation may be subject to disciplinary action.

**Families:** A parent, guardian or family member of a student who has witnessed or who otherwise has relevant information about bullying or cyber-bullying is encouraged to report the matter to the Director of the Middle School, the Director of the Upper School, the Director of Community and Diversity or to any other trusted Belmont Hill adult. Furthermore, a parent or guardian should also report any incident of retaliation to the School.

**Faculty and Staff:** Any member of the faculty or staff of who witnesses or otherwise becomes aware of bullying, cyber-bullying or retaliation is expected to report it to any member of the Administrative Team listed in Section V. Any faculty or staff member who witnesses or otherwise becomes aware of bullying, cyber-bullying or retaliation but does not report it may be subject to disciplinary action, up to and including termination of employment. A member of the faculty or staff may not make reports under this policy anonymously, nor should a member of the faculty/staff make promises of confidentiality to a student, parent or guardian who informs the faculty/staff member of an alleged incident of bullying, cyber-bullying, or retaliation.

If a faculty/staff member witnesses an act of bullying, cyber-bullying or retaliation in progress, the faculty or staff member is expected to take reasonable steps to stop the act by communicating directly with the person whose behavior is considered unacceptable, offensive or inappropriate.

**Anonymous Reporting:** Faculty/staff may not make reports under this policy anonymously. The School 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 determine the facts of what occurred if complaints are made anonymously, and no disciplinary action will be taken against a student solely on the basis of an anonymous report. While the School cannot promise strict confidentiality, because information must be shared in order to conduct an effective investigation, the School releases information concerning complaints of bullying, cyber-bullying, and retaliation only as needed to address concerns.

V. **Responding to a Report of Bullying, Cyber-Bullying, or Retaliation**

**Administrative Team.** In consultation with the Head of School, an Administrative Team consisting of the Director of the Middle School, the Director of the Upper School, and the Director of Community and Diversity will convene, review, evaluate, and respond to all reports.
of bullying, cyber-bullying, and retaliation.

1. Preliminary Considerations: When a complaint of bullying, cyber-bullying, or retaliation is brought to the attention of the Administrative Team, an investigation and initial assessment are made. The primary initial goals of the investigation are to put an end to the bullying, cyber-bullying, or retaliation, and to protect the well-being and safety of the students and faculty/staff involved, including the alleged targets, witnesses and person(s) about whom the complaint was made. As appropriate, strategies including, but not limited to, increasing supervision, separation of the alleged perpetrator and target, creating a personal safety plan, pre-determining seating arrangements for the target and/or the aggressor in the classroom, at lunch, or on the bus; identifying a faculty/staff member who will act as a “safe person” for the target; and altering the aggressor’s schedule and/or access to the target may be used to prevent bullying, cyber-bullying or retaliation during an investigation. At this time, the Administrative Team may also make a recommendation to the Head of School concerning the involved students’ continued attendance at Belmont Hill during the investigation.

The School is committed to protecting the physical and emotional well-being of all of its students and will take appropriate measures to do so. Thus, the School will be sensitive to the needs of both the alleged targeted students as well as the alleged bullies. The Administrative Team will take additional steps to promote safety during the course of and after the investigation, as may be appropriate, including implementing protocols for protecting individuals who report or witness bullying, or who are interviewed regarding bullying.

At any point after receiving a report of bullying, cyber-bullying and/or retaliation, the Head of School, the Director of the Middle School, the Director of the Upper School, and/or the Director of Community and Diversity may notify local law enforcement in the event that the Head of School, the Director of the Middle School, the Director of the Upper School, and/or the Director of Community and Diversity has a reasonable basis to believe that criminal charges may be pursued against the alleged perpetrator.

If the School receives a report of bullying, cyber-bullying, or retaliation involving students from another school, the Head of School may, consistent with state and federal law, promptly notify the appropriate administrator of the other school so that both may take appropriate action.

2. Obligation to Notify Parents/Guardians: A member of the Administrative Team will ordinarily notify both parents/guardians of any student who is an alleged perpetrator or target of bullying, cyber-bullying, or retaliation promptly after a complaint has been made. The parents or guardians of a target shall be notified of the action taken to prevent any further acts
of bullying or retaliation.

3. Investigation: Once a complaint has been reported, an investigation of the complaint will be conducted by members of the Administrative Team. The investigation may include, but will not necessarily be limited to, interviews with the person who made the complaint, interviews with the student who was the target of the alleged bullying, cyber-bullying, or retaliation, interviews with the alleged perpetrator(s), and with any students, faculty, staff or other persons who witnessed or may otherwise have relevant information about the alleged incident.

Depending on the circumstances, the designated investigator(s) may choose to consult with teachers, the School nurse, the parents/guardians of the student or students who were allegedly targeted, and/or the parents/guardians of the student or students alleged to have been the aggressors, or any other person whom the investigator deems to have knowledge about, or circumstances surrounding, the complaint.

All persons will be informed that the School will not tolerate any form of retaliation directed toward an individual who in good faith makes a complaint or participates or cooperates in an investigation. All persons involved in an investigation should understand that false or exaggerated accusations can be extremely damaging to innocent persons; therefore, all claims require the honest and full disclosure of facts by all involved persons. False accusations will not be tolerated and may lead to disciplinary action.

4. Resolution, Notification, and Follow-up: Upon completion of its investigatory actions, the Administrative Team will make recommendations to the Head of School about any appropriate disciplinary and/or other remedial actions. The Head of School has final responsibility for any disciplinary responses. Ongoing monitoring and assessment of the Administrative Team's recommendations for students and faculty/staff involved in any incident of bullying, cyber-bullying, and retaliation will be carried out by the Administrative Team in close consultation with the students’ advisors (as applicable).

The goal of an investigation and any disciplinary or other remedial process that is imposed following an investigation is to: (a) correct the situation to the extent it is reasonably possible; (b) take such steps as are reasonable to prevent there being a repetition of the incident; and (c) prevent target and others who participated in the investigation from being subject to retaliation.

In appropriate circumstances, such as when a crime may have been committed or a child may have been abused or neglected as reportable under M.G.L. c. 119, § 51A, law enforcement or other appropriate government agency may be notified.
Upon completion of the investigation, the Head of School, the Director of the Middle School, the Director of the Upper School, and/or the Director of Community and Diversity will meet individually with the student(s) and/or faculty/staff who were the targets and alleged perpetrators of the alleged incident, as well as the parents or guardians of these students. The goal of this meeting will be to report the results of the investigation and, where disciplinary or other corrective steps are determined to be appropriate, to inform the individuals of the steps that will be taken to correct the situation. Confidentiality laws protecting student and employee records may limit the amount of information provided in these meetings.

Students that have been targeted in violation of this policy and their parents or guardians will be contacted in follow-up conversations to inquire as to whether there have been any further incidents. The Head of School, the Director of the Middle School, the Director of the Upper School, and/or the Director of Community and Diversity will discuss with the targeted students and their parents or guardians whether any additional steps should be taken so that the targeted students may achieve a restored sense of safety.

Resources such as counseling or referral to appropriate services are available to all students and faculty/staff during and after an investigation. These resources are available to both alleged perpetrators and alleged targets.

5. **Disciplinary Action:** The Head of School, the Director of the Middle School, the Director of the Upper School, and/or the Director of Community and Diversity will determine the appropriate disciplinary actions for a student who is found to have committed an incident of bullying, cyber-bullying, or retaliation. The Head of School will decide on the appropriate disciplinary actions for a member of the School faculty/staff who is found to have committed an incident of bullying, cyber-bullying, or retaliation in accordance with the policies set forth in the Employee Handbook. The range of disciplinary actions that may be taken against a perpetrator for bullying, cyber-bullying, or retaliation shall balance the need for accountability with the need to teach appropriate behavior, and includes:

- Counseling;
- Detention;
- Suspension;
- Dismissal from school; and
- Termination of employment

Any student found to have made a false allegation of bullying, cyber-bullying, or retaliation may also be subject to disciplinary action.
VI. Communication and Resources

The School’s community expectations are communicated annually in the publication of our Student-Parent Handbook on our website. Our School Counselor is also available to assist families with identifying further resources, including local therapists.

VII. Conclusion

This Plan, which is consistent with Belmont Hill’s mission and policies that appear in the School’s Student-Parent Handbook and Faculty/Staff Handbook, outlines the School’s bullying, cyber-bullying, and retaliation policy and is consistent with the School’s ongoing commitment to fostering a safe, supportive, and respectful learning environment for all members of the Belmont Hill community. This Plan is intended to (a) prevent bullying and cyber-bullying at the School and in the School community, (b) encourage students and their parents or guardians and faculty/staff to have confidence in the School’s procedures and come forward promptly whenever an individual is subject to conduct that is prohibited by this or any other School policy; and (c) implement appropriate discipline and other corrective measures when they are warranted.