

Lighthouse School[®]



Bullying Prevention And Intervention Plan

2026-2027

Bullying Prevention and Intervention Plan

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I. Overview and Broad Policies

Executive Summary

Lighthouse School has provided services to special needs children and their families for almost 60 years. Many changes have occurred over this time, both within Lighthouse School and in the world. What has remained absolutely constant, however, is the belief that students' emotional needs are at the center of our treatment mission. Lighthouse School is both a school and a treatment center. Academic achievement, although important, is not our highest priority. Long-term clinical growth generalized across life context is our highest priority. APEX is a unique biodevelopmental, or life developmental program that all team members are trained in and that forms the foundation of our services. Lighthouse School is a corporation dedicated to helping students overcome the dysfunctional patterns of social/emotional/behavioral functioning that brings them to us and to helping them to acquire the skills and insights that will allow them to be successful in life.

We believe that, first and foremost, we are a corporation for kids and that everything we do needs to focus upon promoting optimal life success for every child entrusted to our care. This is not simply a slogan etched in granite, but rather a foundational belief that guides long-term policies and everyday practices.

From a practical perspective, Lighthouse School serves a population of children and young adults with significant and complex social/emotional/behavioral/psychiatric disorders. This population includes:

- students who are at heightened risk to be aggressors in cases of bullying
- students who are at heightened risk to be targets in cases of bullying
- students who are at heightened risk to be both targets and aggressors in cases of bullying
- students with significant disturbances in social functioning whose actions may meet the definition of bullying even though they may lack a full understanding of the consequences of their actions
- students who may be targets of bullying yet who lack the social awareness to understand what is happening
- students who, in addition to one or more of the above-described conditions are a member of a group considered by society as a whole to be more vulnerable to bullying

What all of this means in the current context of bullying prevention and intervention is that we will continue to use APEX to treat the children entrusted to our care. That work will be guided by core beliefs that include:

1. The belief that **every** child deserves to be treated fairly, equitably, and respectfully.
2. The belief that **each** child is a unique individual that should never be labeled based on a single characteristic or feature.
3. The belief that it is our responsibility to **each** child and to **every** child that their strengths are enhanced, their needs respected, and we do everything in our power to advance their long-term ability to master life challenges.

We are confident that in doing so we will meet or exceed the mandates contained in the bullying laws.

At its core, bullying represents pathological patterns of interpersonal interaction. The need for formal plans suggests a widespread belief that schools have not been attentive enough to these and other related issues regarding the emotional functioning and needs of their students. One can only hope that the tragic events that bring us to this point will ultimately lead to a social consensus that schools can play, and indeed should play, a powerful and positive role in the emotional well-being and growth of their students. We offer our Bullying Prevention and Intervention Plan as both a reflection of our historical belief in that principle and as an example of our current application of these principles.

Background

Lighthouse School serves over 200 students from over 100 communities in Massachusetts, New Hampshire, and Maine. Students who attend Lighthouse School range in age from 3 to 22 years. Students present with a wide range of diagnoses that include PTSD/Trauma, Attention Deficit Hyperactivity Disorder, Anxiety Disorders, Autism Spectrum Disorders, Pervasive Developmental Delays, Mood Disorders, Disruptive Disorders, Learning and Communication Disorders, Psychosis/Thought Disorders, Intellectual Impairment/Global Delays, Medical Disorders, and Attachment Disorders.

The students enrolled at Lighthouse School include students who are at increased risk to be aggressors in terms of bullying as well as students with deficits in social functioning that results in them being at increased risk for being a target of bullying actions. As a result of their complicated clinical profiles and learning histories, the students require very comprehensive clinical treatment and behavior management programming that typically involves specialized, school, clinical, behavioral, transportation, attendance assurance, home, and community programming.

Lighthouse School provides treatment for all students using a treatment technology called APEX (**A**ssimilated **P**ersonal **E**nrichment **E**Xperiences.) The major points of this treatment include improving a student's ability to become more functionally adaptive in life. This technology, which was developed exclusively at Lighthouse School, is designed to promote a student's understanding of self/other relationships and their development across eight dimensions of human growth and development that include: the spiritual, affective, temporal, social, cognitive, sensory, physical, and behavioral dimensions. We believe that a diverse student population contributes to the clinical well-being of all by allowing students to compare and contrast their strengths and weaknesses with those of their peers. This is believed to be beneficial because coping effectively with a disability involves both objectivity and empathy.

A Brief History of Massachusetts Anti-Bullying Statutes

An Act Relative to Bullying in Schools, was signed into Massachusetts law May 3, 2010 and took effect immediately. The law required schools and school districts to develop and implement plans to address bullying prevention and intervention. It created regulations that addressed a school's duties, namely notification to parents or guardians of the target and the aggressor of bullying or retaliation and the action taken to prevent further bullying, and notification to law enforcement when the aggressor's conduct may result in criminal charges.

In 2013, Massachusetts expanded the definitions of who could be identified as an aggressor to include any staff working with students at a school.

In 2014, the state made a determination that certain enumerated categories of students may be more vulnerable to bullying and that accordingly, schools needed to specifically support the needs of these students.

In 2017, DESE included training in bullying prevention and intervention as part of mandatory staff training requirements.

Priority Statements

- Lighthouse School is committed to creating and maintaining an environment where all members of the school community feel safe and supported in their efforts to grow towards their maximum potential.
- Lighthouse School strives to have every member of the school community, both team members and students:
 - Work constructively to expand their understanding of and respect for their needs and the needs of others
 - Resolve conflicts in a positive and mutually constructive manner

- Act in a manner that promotes the well-being of self and other people
- Refrain from any action that is intended to or has the effect of infringing on the rights, experiences or needs of others. This includes, but is not limited to:
 - Bullying
 - Cyberbullying
 - Retaliation
- Lighthouse School is invested in supporting all team members in their work with challenging students by:
 - Providing training and direct instruction about treatment actions and interventions
 - Offering constructive feedback to maximize objectivity
 - Creating an administrative system that quickly and effectively resolves issues and conflicts as they arise

We at Lighthouse School have established this Bullying Prevention and Intervention Plan for preventing, intervening, and responding to incidents of bullying, cyberbullying, and retaliation. The Associate Director of Clinical Services is responsible for the implementation and oversight of the Plan.

Definition of Key Concepts

Aggressor is a student (or team member) who engages in bullying, cyberbullying, or retaliation.

Bullying, as defined in M.G.L. c. 71, § 37O, is the repeated use by one or more students (or team members) of a written, verbal, or electronic expression or a physical act or gesture or any combination thereof, directed at a target that:

- causes physical or emotional harm to the target or damage to the target's property
- places the target in reasonable fear of harm to himself or herself or of damage to his or her property
- creates a hostile environment at school for the target
- infringes on the rights of the target at school
- materially and substantially disrupts the education process or the orderly operation of a school

Cyberbullying is bullying through the use of technology or electronic devices such as telephones, cell phones, computers, and the Internet. It includes, but is not limited to, email, instant messages, text messages, and Internet postings. See M.G.L. c. 71, § 37O for the legal definition of cyberbullying.

Hostile environment, as defined in M.G.L. c. 71, § 37O, 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.

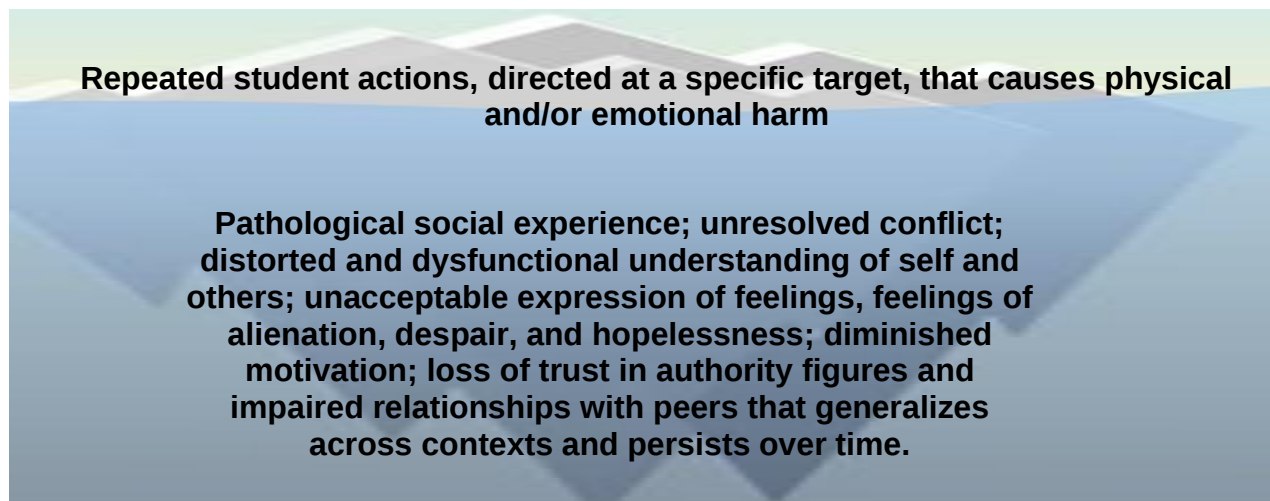
Team members include, but are not limited to, educators, administrators, counselors, school nurses, cafeteria workers, custodians, bus drivers, athletic coaches, advisors to extracurricular activities, support team members, or paraprofessionals.

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

Bullying from the Perspective of APEX Biodevelopment

Much has been written about bullying and it is beyond the scope of the current plan to present an extended interpretation of bullying from the perspective of APEX. At the same time, however, it is important to briefly address this issue, as it is the foundation upon which all interventions are based.

Consider bullying as an iceberg:



Roughly 7/8ths of an iceberg are underwater and thus unobservable. Like an iceberg, what is immediately apparent is the bullying being observable, inappropriate and intrusive actions of one student (or students) directed towards another. Clearly and unquestionably, these inappropriate actions must be addressed and stopped. From the perspective of APEX, however, the emphasis is expanded beyond that which is observable to a deeper consideration of the underlying features, both causal and resulting, associated with bullying. APEX emphasizes that the vast majority of the problem of bullying and therefore the best target for long-term resolution of the problem are the features that lie below the surface.

Children and young adults spend significant amounts of time in school. As a result, school-based experiences have a powerful and lasting impact on development; that is, the experiences in school will contribute to the character of a person – the combination of features and traits that make up their individual nature and out of which they act. That character, in turn, is shaped by the sum of experiences, feelings, thoughts and perceptions (accurate or not) that have made up the person's life. It follows from this that the actions of bullying, as well as anything else that interferes with a positive, well-functioning life, are not the whole problem but are expressions, or symptoms, of something deeper. It is not enough, then, to address only the symptoms

as important as that is. It is also crucial to find ways to treat what underlies the symptoms if meaningful change is to occur. Extending the iceberg analogy one step further, bullying represents a highly unfortunate collision between aggressor and target. From the perspective of APEX treatment, both target and aggressor can benefit from understanding what led to this collision or conflict and what can be done in the future to avoid such problems. These concepts underlie everything we do here at Lighthouse School, including our Plan for prevention and intervention of bullying. The underlying issues that are expressed in the symptoms of bullying behavior, such as aggression, dysfunctional social skills, inadequate self-concept, and internal conflicts arising from unresolved past experiences, are daily goals of treatment. This holds true as well for the underlying symptoms of susceptibility to being targeted by bullying behaviors. Our purpose, then, is to address these underlying issues that give rise to negative and/or ineffective symptoms while at the same time maintaining effective boundaries within which students can experience safety and growth.

Lighthouse School's Resources Responsible for all Aspects of Programming Related to Bullying

Recent years have seen increased attention on not only bullying, but also a wide range of issues associated with regulation-based actions and the interventions used to treat them. Consistent with this pattern, as well as with our long-standing investment in providing the best possible services to our students, Lighthouse School has added considerable resources to a team that we are referring to as 'Regulation Support". It must be stressed that these changes are not the result of any problem, deficit, or issue in our programming or treatment. Rather, the changes reflect the increased focus on these issues and our efforts to develop outstanding programming. The following people will be the primary team members responsible for implementation, administration, and application of Lighthouse School's bullying plan:

Scott Bartis, Ph.D.	Chief Executive Officer
Dorothy Pepin, B.S.	Chief Administrative Officer
John Tarmey, B.S.	Senior Director of Operations
Jennifer Kamin, B.S.	Director of Program Administration
Peter Lang, M.Ed.	Director of Regulation and Safety
Lara Finn, M.A., LMHC	Associate Director of Team Development Svcs.
Patti Hirst, B.S.	Associate Director of Educational Services/Principal
Sandra Muldowney, M.S.	Associate Director of Clinical Services
James Dalton, M.Ed.	Senior Coordinator for Staff Development
Lauren Galonski, Psy.D.	Coordinator for Treatment Services
Rick Kilmartin, M.Ed.	Coordinator for Treatment Amplification
Kerry McNeal, LMHC	Coordinator for Treatment Services
Ann Chaffee, M.A.	Supervisor for Family and Outreach Services
Kristine Gorski, B.A.	Supervisor for Regulation
Brittani Murphy M.A.	Supervisor for Family and Outreach Services
Diane Weaver, Psy.D.	Supervisor for Treatment Services

Ms. Muldowney, Mr. Kilmartin, Ms. McNeal, and Dr. Galonski are the primary team members who address the reports or concerns from students, parents, guardians, and other concerned individuals. Calls to other people regarding potential bullying or related concerns will be redirected to these four individuals. They can be contacted at

Lighthouse School at 978-251-4050. Mr. Kilmartin is the primary team member charged with conducting bullying investigations.

II. Training and Team Members-based Actions

Overview

Lighthouse School places a high value on the team members' training. Time is devoted each week to addressing a variety of training subjects. The highest value is placed on training team members to clinically address the needs of the students from the perspective of APEX Biodevelopmental technology. Topics included in these trainings include, but are not limited to:

- positive interventions to promote functional change
- the development, maintenance, and expansion of relationships based on trust, mutuality, and emotional accountability
- affective awareness, acceptance, and understanding
- conflict resolution skills
- insight and objectivity
- the importance of compliance with norms and expectations based on social consensus
- student disabilities, syndromes, and symptoms
- crisis management techniques
- de-escalation techniques

Training for Supervisors and Managers

Leadership is a critical component to the success of any organizational initiative. At Lighthouse School, leadership has always been an organizational value. Management is an administrative function with authority that comes with the title; leadership is an interpersonal attribute that is earned. At Lighthouse School we have a dedicated team of Supervisors and Managers who first and foremost are leaders. Supervisors and Managers participate in advanced training in all aspects of bullying, including legal and regulatory issues so as to be able to provide the highest quality of leadership on bullying to all team members. This training also includes participation in training and discussions with other agencies and groups such as MAAPS, and the Department of Elementary and Secondary Education.

Annual Team Members Training for all Team Members on Bullying

All team members participate in training sessions related to bullying, interpersonal conflict, and related topics. Training occurs intermittently throughout the year.

Ongoing Professional Development Seminars for all Team Members on Bullying Training Seminars

Understanding, recognizing, responding to, and treating issues associated with bullying are incorporated into the annual trainings in the team members development seminar system utilized at Lighthouse School. In addition, throughout the year, key

concepts associated with bullying are reviewed as part of the weekly Whole Team Conference.

Small Group Training: The program-based system of Lighthouse School is utilized to target team members working with those student populations that are more likely to experience issues with bullying and/or to respond to actual instances of bullying.

Role-based Training is utilized for those team members whose role makes them particularly likely to confront bullying. These roles include but are not limited to: Bioeducational Facilitators, Teachers, Clinical Services Team Members, Regulation Support Team Members and Family and Outreach Therapists (in order to enable them to educate parents and guardians).

Individual Team Members Training: Lighthouse School has in place a sophisticated training system whereby any team member may request training on any treatment topic. A Coordinator for Treatment Services is responsible for arranging appropriate training for that team member. A member of the Clinical Services Division typically conducts these trainings. These trainings are documented and become part of a training database.

Training Content Specifically Targeted to Address Bullying includes but is not limited to:

- All aspects of this plan
- Interpretation of bullying from the perspective of APEX Biodevelopmental Technology
- Developmentally appropriate treatment options to proactively reduce or eliminate bullying
- Developmentally appropriate treatment options for students who feel that they may be experiencing bullying
- Developmentally appropriate treatment options for students who have been bullied
- Developmentally appropriate treatment options for students who engage in bullying
- Conflict resolution skills and approaches
- Students at heightened risk for being the targets of bullying
- Students at heightened risk for engaging in bullying
- The many forms that bullying may take including cyberbullying
- Skills, scripts, and approaches to increase the appropriate expression of affect
- The importance of interpersonal understanding, perspective taking, and empathy
- The needs underlying bullying experiences
- The procedures to follow to report potential bullying incidents or any inappropriate or 'at risk' action
- Managing stress, frustration, and other affective responses that inevitably arise in working with children

FUSION Biomanagement Technology

Just as Lighthouse School has a philosophy and a methodology for life education, we also have a philosophy and a methodology for team members' development. The philosophy is expressed in the applications of biomanagement, or life management, and reflects the goals and practices of FUSION Biomanagement Technology.

Biomanagement refers to the idea that effective management of any organization must focus, not just on organizational structure, but also on the people who work in the organization and on the important needs in their working lives. It does not refer only to what supervisors do, but what everyone in an organization does to ensure that the organization reaches its goals. People who work in any organization, including a school system, have two fundamental sets of needs. These are personal needs and professional needs. Effective management must take both into account if the organization is to encourage motivation and investment on the part of team members to accomplish the organization's mission. At Lighthouse School, our mission is to help students develop to the highest level of life success and accomplish everything that they can. To the extent that team members' personal and professional needs can be accurately identified, mutually addressed, and kept at the focus of the management system, motivation and commitment are maximized. The motivation and investment of team members are instrumental to the success of any organization. FUSION Biomanagement Technology fosters work experiences, work relationships, and work structures that help Team Members work together to effectively and efficiently meet the needs of students and their families.

Each Team Member hired to work at Lighthouse School comes with a wide variety of personal and professional skills and an inherent capability to contribute to the organization's success. Applying and expanding these skills for the benefit of students requires a strong organizational culture that fosters consistency, respect, and a sense of the value of each person to the work we all share. FUSION provides team members with opportunities to better understand their own and their colleagues' needs and to develop supportive and positive supervisory and peer relationships. Team members come to understand the value of being part of a caring and professional organizational culture and to share the pride that comes from being part of a team that is strongly motivated and committed to the organization's mission.

Team Members as Potential Aggressors

Massachusetts General Laws relevant to bullying were amended in 2013 to include school team members as potential aggressors. School team members are defined as: a member of a school including, but not limited to, an educator, administrator, school nurse, cafeteria worker, custodian, bus driver, athletic coach, advisor to an extracurricular activity or paraprofessional.

It is perhaps obvious to say that the need for such an amendment is a sad reflection on the state of American education. That said, this plan represents an opportunity to expand on the commitment of Lighthouse School to create a treatment and learning environment that promotes positive life development for all its members (team members, students, families, school systems, community-based collaborators,

etc.). As such, this commitment includes addressing uncomfortable realities of contemporary society in a straightforward and constructive manner.

From the perspective of APEX Biodevelopmental Technology, all team members play a role in the team treatment of our students. While this has many benefits, it highlights the possibility that team members can have a powerful influence on the lives and experiences of students. Unfortunately, it is impossible to deny that this influence can, under certain circumstances, lead to actions that meet the definition of bullying. It is thus an administrative and cultural imperative that safeguards be put in place that bring as close to absolute zero as possible, any actions by any team members that could be bullying of students. The following are specific, operational actions that maximize the likelihood that all students are afforded a safe and positive learning/treatment environment where they are treated with dignity and respect.

- The participation by all team members in FUSION as described above
- A high level of supervisory presence throughout the program on a daily basis
- A high level of training and investment in supervisors and managers to provide positive and constructive feedback immediately rather than wait for problematic patterns to develop
- A culture that instills in all team members the responsibility and obligation to share both positive and constructive feedback with each other
- Close relationships with every student by more than one team member
- Discussing, practicing, and exploring the core belief that everyone makes mistakes, but that thematic actions that do not promote biodevelopment or, worse yet, are harsh, negative, punitive, and/or judgmental are unacceptable, intolerable, and indicative of a fundamental compatibility between the individual demonstrating these actions and working at Lighthouse School

III. Treatment

APEX Biodevelopmental Technology:

Treatment Philosophy/Clinical Curriculum: Lighthouse School's treatment philosophy is based on the notion that Biodevelopment, or life development, represents the highest priority for treatment. This is because biodevelopmental deficits so strongly affect a person's future chances of achieving functional adaptation. Functional adaptation is the set of practical mastery skills that reflect a person's capacity to successfully negotiate the diverse challenges of life.

Lighthouse School has developed a biodevelopmental technology called APEX in order to enhance to the highest degree possible, each student's biodevelopmental proficiency. APEX stands for **A**ssimilated **P**ersonal **E**nrichment **E**Xperiences. APEX includes comprehensive services provided at school, at home, and in the community for each attending student. Providing integrated services across life settings helps to ensure consistency and efficacy and to maximize student-based growth.

One of the foundational beliefs of APEX is that it is insufficient and inadequate to simply consider and to treat overt behavior or action. In order for generalized and durable growth to occur it is critical to understand and address the more covert features

or factors underlying overt manifestations. Chief among these underlying features are needs, feelings, and unresolved conflicts.

All team members receive extensive and ongoing training in APEX principles and applications. Lighthouse School's track record of transitioning students to less structured educational settings and the percentage of students continuing on to post-secondary education, speaks to the efficiency of APEX. Also, its reputation in both the special education community and the region as a whole stands as powerful evidence of the effectiveness of APEX in treating complicated clinical issues such as bullying.

APEX is practiced every moment of a student's experience while at Lighthouse School. It is woven into all ongoing educational lessons and activities. Expectations, approaches, and consequences are clear and consistently implemented throughout all contexts.

APEX Biodevelopmental Technology and Bullying

One of the significant benefits of APEX is its functional utility. That is, because the focus is not on overt action, but on underlying causal factors. APEX is relatively easily applied to any number of dysfunctional, inappropriate, and/or intrusive actions exhibited by students. Thus, it is a fairly straightforward process to treat bullying from the perspective of APEX.

Some of the major aspects of the APEX curriculum include:

- Insight
- Conflict Resolution
- Disability Awareness and Acceptance
- Regulation
- Relationships
- Self-Understanding
- Interpersonal Understanding and Acceptance
- Compliance
- Motivation
- Expression of Needs and Feelings
- Empathy
- Interpersonal Interaction
- Functional Adaptation

Student-Based Instruction and Education:

Individual Psychotherapy focused on bullying, conflicts with peers, and self-advocacy. Psychotherapy is designed with the needs of the individual as paramount. This includes focusing on students who are at risk for aggressing, as well as those at risk for being targets. For older students, therapy also addresses the dynamics of bullying and conflict resolution tailored to the individual who bullies, as well as those who are targets of bullying, and cyberbullying.

Group Psychotherapy focused on the education of students about bullying and inappropriate social behavior. Hands-on and interactive activities are used to engage students in a fun, yet informative process that addresses such topics as: learning what

bullying is, what to do if they feel bullied, resisting peer pressure to bully, responding to all forms of inappropriate social action, and self-advocacy.

APEX Treatment is embedded throughout all events, activities and interactions of the school.

Younger students and students with cognitive deficits: with this student population, what starts as a positive motivation to engage socially with peers is experienced by the other student as unwanted, inappropriate, and intrusive. Behaviors such as teasing and inciting are commonplace. Interventions emphasize positive reinforcement in general and rewarding prosocial behavior in particular.

Older students and students with more typical levels of cognitive functioning: with more typical levels of functioning come, unfortunately, an increased likelihood of organized, strategic intentional actions that cause harm to others. Furthermore, with this student group, inappropriate actions are more likely to happen when external structure is reduced or absent. Two settings that meet this definition and have been the setting for confirmed cases of bullying are at home (cyberbullying) and on the bus transporting them to and from Lighthouse School. Specialized APEX interventions are in place to address bullying in each setting.

School-wide Interventions

Philosophy Amplification Project (PAP): We have an ongoing project that enhances and augments our ongoing use of APEX. This project uses multi-modal 'stations' throughout the physical environment of our school in unique ways to not just promote prosocial behavior but to move individual clinical treatment forward for the student. The strength of this experiential project is in how it is used by our team members in conjunction with APEX in student/team member interactions.

School-wide Anti-Bullying Interventions: We have an annual anti-bullying week, typically held during the fall. Each day there is a different theme related to bullying education and prevention. Material is sent home to families. We have created a 'Caught You Caring' campaign where prosocial actions are recognized and celebrated. The week culminates with an anti-bullying rally where students are invited to stand before the group and share their experiences with bullying.

Specialized Student Intervention Programs: Students at Risk for Bullying

Students at risk because of one or more features: we recognize that certain students may be more vulnerable to becoming a target 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.

Identification: As a result of close team member communication and parent involvement (outlined earlier in the plan), we are able to identify those students both at

risk for aggressing and being targeted. We also communicate regularly with school systems, transportation companies and social service agencies that are involved with our students. The records and IEPs of all incoming students are reviewed; issues related to bullying are incorporated into the student's Treatment Plan.

Treatment-Specialized Programs: Specialized plans and programs for clinical treatment are a regular part of our programming at Lighthouse School. These are done to enhance what is already offered to meet the goals of the IEP. When a student is identified as "at risk", a Coordinator for Treatment Services works with involved team members to develop a specialized plan in conjunction with the appropriate clinician.

Treatment-Family Therapy: Collaboration and communication with families is an essential component of the services provided at Lighthouse School. All families are assigned a Family and Outreach Therapist with whom they meet monthly. Issues associated with bullying prevention and intervention in general, and the issues that arise in specific instances are addressed with the family of involved students. A Supervisor for Family and Outreach Services works with the identified Family and Outreach Therapist to educate families about APEX concepts and techniques in general and their specific application regarding bullying in particular. Other topics include: helping each family generalize the APEX-based clinical intervention being used at school, helping families to understand the dynamics of bullying and teaching awareness of online safety issues and watching for signs of cyberbullying. Parents are taught how to take appropriate action when warning signs are present. Special attention is given to the topic of cyberbullying with the families of teenaged students. Individualized family treatment objectives are developed for families whose child has been identified in bullying incidents.

Individual IEPs: We strive to have all of our IEPs reflect the core clinical needs of our students. This includes a history of bullying involvement as well as the presence of features that place the student at heightened risk for being either an aggressor or a target.

Team Members-Based Intervention

As addressed earlier, FUSION is a unique life management system delivered and implemented at Lighthouse School. All team members participate in FUSION. Each team member meets weekly with their immediate supervisor to: discuss and process the week's events, discuss and explore the personal impact and meaning that those events had on the individual, address any conflicts or difficulties that arise, work together to create a cooperative partnership where there are outcomes that are mutually beneficial to the person and the organization. One aspect of FUSION is providing feedback about that team member's pattern of interaction with students; to highlight particularly effective themes and to address or remediate any issues. FUSION is the primary forum where issues of how team members are interacting with students is addressed.

IV. Reporting and Intervention

Global Reporting Guidelines

Reports of actions that may be bullying or retaliation may be made by team members, students, parents or guardians, or others, and may be oral or written.

Reports may be made anonymously. The Coordinator for Treatment Amplification, or designee is responsible for documenting and recording all reports of bullying. A standard reporting form will be provided on our website.

Resources for Reporting

At the beginning of each school year, Lighthouse School provides all members of the school community, including administrators, team members, students, and parents or guardians, with written notice of its policies for reporting acts of bullying and retaliation. This information is included in the annual revisions of the Lighthouse School Family Handbook. This documentation includes contact information for the Coordinator for Treatment Amplification or designee, who will serve as the main point of receiving and collecting reports of potential bullying.

As a treatment center, Lighthouse School serves a population of students who sometimes engage in behaviors that affect other people in negative ways. Some students' disabilities and profiles are such that they engage in behaviors consistent with the definition of bullying, both as aggressors and as targets. The focus of treatment, therefore, focuses heavily on individuals learning about the needs of themselves and others, the importance of treating others with consideration, and the process of conflict resolution. These goals are so embedded into the fiber of Lighthouse School's treatment structure, that the language used to describe negative incidents is more likely to be considered in these terms, rather than in the terms described by the Anti-Bullying Law. Members of the treatment team are highly trained to identify and resolve incidents of threats, aggression, intimidation, and hostility in the school environment.

Events that rise to the level of bullying, as identified by any member of the school community, are managed in compliance with Massachusetts General Law.

Reporting by Team Members

Formal policies and procedures are in place to ensure that any information concerning safety is quickly, efficiently, and accurately communicated to the Directors Team. All team members are trained in this policy. The specific policy regarding the communication of information about bullying is simply one subset of this more global policy. This global policy clearly states that should any team member become aware of any event, action, or situation that MIGHT be significant or involve "at risk" actions, they should immediately contact a member of the Supervisory or Management Team. Examples of actions, events or situations include: bullying, comments and/or gestures about suicide or self-injury, threats of violence directed towards another person, possession of drugs, weapons or other contraband, and any other action that may put people at risk. When a member of the Supervisory Team becomes aware of a significant student incident, they work directly with a Coordinator for Treatment Services, who in turn is responsible for communicating with the Associate Director of Clinical Services and other members of the Management Team to respond and resolve the situation.

With specific regard to bullying, team members immediately communicate any information or concerns to the Coordinator for Treatment Amplification, Mr. Rick Kilmartin or designee. Mr. Kilmartin or designee will then organize and coordinate actions and communication. The requirement to report information relevant to bullying to

a supervisor does not limit the authority of the team member to respond to behavioral or disciplinary incidents consistent with Lighthouse School policies and procedures for behavior management and discipline.

Reporting by Students, Parents, Guardians, and Others

Lighthouse School expects students, parents or guardians, and others who witness or become aware of actions that may be bullying or retaliation involving a student to report it to a Lighthouse School team member. Reports may be made anonymously, but no disciplinary action will be taken against an alleged aggressor solely on the basis of an anonymous report. Students, parents or guardians, and others may request assistance from a team 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 team member, or with a Supervisor for Student Regulation or designee.

Lighthouse School assigns a Family and Outreach Therapist to each student's family. It is most likely that any reports received from parents will be reported to the assigned Family and Outreach Therapist. The therapist will communicate all concerns from parents regarding bullying to their Supervisor. Consistent with Lighthouse School treatment, therapists are authorized to investigate and resolve the incidents reported. This includes consequences for students found to be engaging in aggressive behaviors and a resolution of the conflict between students. In all instances, families will be notified of the results of the school's actions. The goal is to complete all incidents to provide maximum satisfaction of safety and resolution to the student's family.

Reports of Potential Bullying by Team Members

Any student, parent, or team member who has concerns about how a team member is interacting with a student, regardless of whether or not they consider it potential bullying, is strongly urged to share their concerns with any supervisor or manager. These reports will be investigated by a member of the Management Team on a case-by-case basis. In all other respects, reports of potential bullying by team members are handled consistently with those involving bullying by students.

Responding to a Report of Bullying or Retaliation

Safety: Before fully investigating the allegations of bullying or retaliation, the Coordinator for Treatment Amplification or designee will take steps to assess the need to restore a sense of safety to the alleged target and/or to protect the alleged target from possible further incidents. Responses to promote safety typically involve eliminating contact or interaction between identified aggressor and target. Other response interventions are made on a case-by-case basis and may include suspension of the identified aggressor. Actions taken to maximize safety are always communicated to the student's family. The Coordinator for Treatment Amplification or designee will take additional steps to promote safety during the course of, and after the investigation, as necessary.

The Coordinator for Treatment Amplification 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. Safety is the number one priority at Lighthouse School, and all members of the school community will be protected and kept from harm at all times.

Investigation

The Coordinator for Treatment Amplification or designee investigates 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 Coordinator for Treatment Amplification or designee, among other things, interviews students, team members, witnesses, parents or guardians, and others as necessary. The Coordinator for Treatment Amplification or designee, reminds the alleged aggressor, target, and witnesses that retaliation is strictly prohibited and will result in disciplinary action.

Interviews may be conducted by the Coordinator for Treatment Amplification or designee, other team members as determined by the Coordinator for Treatment Amplification or designee, and in consultation with other team members, as appropriate. To the extent practicable, and given his/her obligation to investigate and address the matter, the Coordinator for Treatment Amplification or designee maintains confidentiality during the investigative process. The Coordinator for Treatment Amplification or designee maintains a written record of the investigation.

The Coordinator for Treatment Amplification works closely with the Associate Director of Clinical Services throughout all aspects of the reporting and investigation process. Procedures for investigating reports of bullying and retaliation are consistent with Lighthouse School policies and procedures for investigations. Legal counsel may be accessed as deemed appropriate.

Bullying during transportation to and from school

Each day, students are transported to and from Lighthouse School by transportation providers contracted by each student's sending school system. Lighthouse School team members escort students on and off of these vehicles. In addition, Lighthouse School team members communicate with bus personnel about noteworthy incidents and/or concerns. We use this information to enhance the treatment of all concerned. This includes investigating bus-related issues, such as potential bullying, that may impact students' experiences while at school. This being said, it is critical for all to recognize that transportation is neither the responsibility of, nor under the control of Lighthouse School. Lighthouse School cannot change bus personnel or vehicles, mandate student configurations on the bus or change important details about the transportation contract for a student specified in his/her IEP.

If we become aware of concerns related to bullying on the bus, we will act immediately to do what we can to maximize safety and to make a determination if these actions represent an instance of bullying. Part of this process is communicating with both the transportation provider and the relevant school system. This communication

includes clarifying the limits of Lighthouse School's responsibility and scope of intervention. Parents and guardians will be similarly informed and encouraged to address their concerns directly to the transportation provider and school system.

Determinations

The Coordinator for Treatment Amplification will collaborate with the Associate Director of Clinical Services to make an initial determination based upon all of the facts and circumstances. These determinations will be reviewed by the Directors Team for a final decision. All actions taken hereafter will be done with the awareness and consent of this team.

If it is determined that sufficient evidence exists to warrant a finding that bullying or retaliation has occurred, the Coordinator for Treatment Amplification or designee will take steps reasonably calculated to prevent recurrence and to ensure that the target is not restricted from participating in school or in benefiting from school activities. The Coordinator for Treatment Amplification or designee will: 1) determine what immediate safety actions are required; 2) recommend practical or logistical actions that will contribute to improved outcomes (such as reassigning one or more students to a different homeroom, reducing opportunities for future interaction, etc.); 3) collaborate with a Coordinator for Treatment Services to develop revised treatment plans and strategies to address relevant issues; and finally, 4) communicate with the Directors' Team and other Supervisors and Managers to determine other consequences such as suspension, communication with the Chelmsford Police Department, etc.

Responses to Bullying

Taking Disciplinary Action: If the Bullying Prevention and Intervention Team decides that disciplinary action is appropriate, the disciplinary action will be determined on the basis of facts found by the Coordinator for Treatment Amplification 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 Lighthouse School's discipline procedures.

If it is determined that a student knowingly made a false allegation of bullying or retaliation, that student may be subject to disciplinary action. This may include one or more of the following interventions:

- Revision of their Individual Treatment Plan
- Revision of Student Level
- Time in the Student Regulation Center
- Suspension from school
- Reconvening of the student's team
- Involvement with Chelmsford Police Department

Team members determined to have engaged in actions that meet the definition of bullying will be participating in a FUSION-based process designed to:

- Gain a deeper understanding of the needs underlying these actions
- Develop a training and supervision plan to address issues of treatment proficiency

- Reach a common understanding of the expectations and demands of working at Lighthouse School and to discuss whether or not continued employment is in the mutual interests of both the team member and the larger team and organization.

Promoting Safety for the Target and Others: We strive to create a culture where every individual feels safe and supported. The emotional history and profile of many of our students magnifies the importance of this issue. As a result, whether or not a determination of bullying occurs, when thematic conflicts occur, we carefully consider if changes in programming, services or logistics would lead to an enhanced experience of safety. Examples of such changes include revisions to the treatment planning and implementation of involved students:

- changing the homeroom of the target or aggressor
- changing the program (homeroom configuration) of the target or aggressor
- changing the service delivery group of either the target or aggressor to reduce or eliminate contact
- communication and collaboration with student's family or other professionals working with the student
- student suspension
- reconvening of the aggressor's Team and subsequent student termination by responsible LEA
- formal reporting to Chelmsford Police department
- filing of criminal charges by the Police Department where the incident occurred (bullying on the bus transporting students)

Notification

Beginning in the 2021-22 school year, schools were required to report the number of allegations of bullying or retaliation. This is collected in the School Safety and Discipline Report (SSDR), using the SIF (School Interoperability Framework) in the School's Security Portal. The SSDR Record will include the following: the incident date, the school code, SASID of student offender, a description of the incident, the number of victims, if it was retaliation, if there were any physical injuries, the type of discipline taken and the days missed and services provided during the discipline, if applicable.

Annual Notification to Parents of Lighthouse School's Plan: Annually, every family receives a Family Handbook that outlines this Bullying Prevention and Intervention Plan. Families are informed that they can request a copy of this plan. Furthermore, a link to this plan is included on our website. Family and Outreach Therapists incorporate bullying and Cyberbullying from the perspective of APEX into the ongoing communication with families. Furthermore, the topic of bullying, what Lighthouse School is doing to address it, and what families can do is annually addressed in a newsletter sent to families.

Communication about Student-Based Instruction: A critical component of the Bullying Prevention and Intervention Plan is helping students acquire positive adaptive skills to address such issues as conflict, self-expression, and self-advocacy. Parents are informed of these efforts as described above; that is, via communication with their assigned Family and Outreach Therapist and throughout written communication such as

the Family Newsletter. Families who have questions, would like more information or materials to use with their child, or who otherwise have concerns, are encouraged to communicate those with us so that together they can be resolved.

Notification of Possible Bullying Incident to Parents: In the event that it is determined that bullying occurred, the families of involved students will be informed first via telephone and later by receipt of a formal Student Incident Report. If Safety Actions are deemed necessary, parents will be informed immediately. This communication will be consistent with standard Lighthouse School policy and procedure and will maintain the confidentiality of students. Families are informed of the consequences that follow from the bullying investigation. As with all other issues, families are invited to come to the school to discuss all related issues or concerns. All parental communication will comply with applicable state and federal privacy laws and regulations. Because of the legal requirements regarding the confidentiality of student records, specific information about the issue may not be divulged. This information includes the confidentiality of the name of the target and aggressor. Details about the specific nature of the disciplinary action taken will likewise not be divulged unless it involves a “stay away” order or other directive that the target must be aware of in order to report violations.

Communication with School Systems

Lighthouse School is proud of the communication and collaboration that we have with school systems. In the event that it is determined that bullying occurred, the school systems of involved students will be informed first via telephone and later by a copy of the Student Incident Report sent to families. This communication will include consequences that follow from the incident. Bullying incidents may require the reconvening of the student’s Team; in these instances, this will be done in a timely and efficient manner. Communication and collaboration with school systems is particularly important when bullying occurs on the vehicle transporting students to and from school. Communication with representatives of the school systems of Lighthouse School students regarding any and all aspects of this plan will be the responsibility of the Director of Program Administration or designee. Actions involving the school system will be done in a manner consistent with existing Lighthouse School policy and practice.

Notice to Another School or District

Circumstances may arise where either the alleged target or aggressor attends another school. This is most likely to result from incidents that occur on the vehicle transporting students to and from Lighthouse School. Should such an event occur, the Bullying Prevention and Intervention Team at Lighthouse School will investigate the incident as described elsewhere in the plan while at the same time determining whether other programs, school districts, or agencies should be contacted. All communications will be in accordance with state and federal privacy laws and regulations, and 603 CMR 49.00.

Notice to Law Enforcement

At any point after receiving a report of bullying or retaliation, including after an investigation, if the Bullying Prevention and Intervention Team has a reasonable basis to believe that criminal charges may be pursued against the aggressor, the Director of Regulation and Safety will notify the local law enforcement agency.

Lighthouse School has a formal relationship with the Chelmsford Police Department. We have negotiated a memorandum of understanding for our regular communication with the Chelmsford Police Department and we have a School Liaison Police Officer assigned to our school. If the decision is made for this officer to meet with a student, every effort will be made to communicate this to the student's parents or guardians before the meeting occurs.

Communication, teamwork, collaboration.

As has been emphasized throughout this document, safety is the highest priority. We have attempted to thoroughly and effectively address the issue of bullying, especially as it pertains to our students and their complex clinical profiles. We are proud of our efforts and actions and will continue to work to enhance this system as part of our larger mission to advance the well-being of our students. We welcome feedback from parents, guardians, community-based professionals, school system personnel and others about any aspect of this system or about bullying or conflict more broadly defined. This feedback will be given the highest degree of consideration and every effort will be made to incorporate feedback into our system. Anyone with information or feedback should feel comfortable contacting Ms. Sandra Muldowney, Associate Director of Clinical Services, at the main Lighthouse School number of 978-251-4050.

Conclusion

The recent emphasis on bullying represents an unfortunate acknowledgement that the needs of children have been neglected, both in society as a whole, and within educational settings in particular. Lighthouse School's Bullying Prevention and Intervention Plan represents only a single example of our long-term investment in promoting the optimal life success of children. We hope that this plan accurately conveys that investment and offers a perspective on children and their needs that extends far beyond the walls of Lighthouse School.