ST. PAUL'S
COMMUNITY SCHOOL

BULLYING BEHAVIOR PREVENTION AND RESPONSE

I. SCOPE AND DEFINITION

St. Paul's Community School supports a positive school climate conducive to teaching and learning that is free from threat, harassment, and all types of bullying. It is the policy of SPCS to prohibit all bullying of any person at school. Prohibited conduct includes incidents of bullying instigated by the use of electronic communication specifically directed at students and/or school personnel. This policy extends to all schools that comprise the District. Bullying is anti-social behavior on school premises that distracts both the victim and the person bullying another. Bullying a student based on their race, color, creed, disability, sex, sexual orientation, age, religion or any other personal characteristic is grounds for disciplinary action. 70 Okla. Stat. Sec. 24-100.3.

Bullying, as defined by the School Safety and Bullying Prevention Act, means any pattern of harassment, intimidation, threatening behavior, physical acts, or communication (verbal or electronic) that is directed toward a student or group of students. Bullying is performed with the intent, or reasonably perceived intent, of causing negative educational or physical consequences for the targeted student or group. Bullying is communicated in such a way as to disrupt or interfere with the school's educational mission or the education of any student. 70 Okla. Stat. Sec. 24-100. Isolated action, not involving pattern, may also constitute bullying based on its severity.
Threatening behavior is any pattern of behavior or isolated action, whether or not it is directed at a person, that would cause a reasonable person to believe that there is potential for future harm to students, school personnel or school property.

Electronic communication is the communication of any written, verbal, pictorial information, or video content by means of an electronic device, including, but not limited to, a telephone, a mobile or cellular telephone, or other wireless telecommunication device, or a computer.

Bullying is prohibited at school and school sponsored events. It also is prohibited: (a) while traveling to and from school; (b) while off-campus during lunch or before and after school; or, (c) at any other time outside the normal school day when such behavior has a negative or adverse effect on the discipline or educational process of the school. (O.S. 70 §24-100.3)

II. PREVENTION

Safe Schools Committee
The duties of the Committee shall be the duties set forth in 70 O.S. § 24-100.4(B).
Operational functions of the Safe School Committee include but not limited to:

- Promoting positive social behaviors
- Raising awareness in schools about the dangers of bullying
- Planning and implementing prevention efforts.
- Urging notification to the school of unsafe conditions, possible strategies for avoiding harm, student victimization, and other issues that compromise the maintenance of a safe school.

With respect to student bullying, each Committee shall assist the board in promoting a positive school climate. The Committee will study the District's policy and currently accepted bullying prevention programs (available on the Oklahoma State Department of Education website) to make recommendations regarding bullying. These recommendations must be submitted to the site principal and cover:

1. Needed staff development, including how to recognize and avoid bullying;
2. Increasing student and community involvement in addressing bullying,
3. Improving individual student-staff communication,
4. Implementing problem-solving teams which include counselors and/or school psychologists, and
5. Utilizing behavioral health resources.

All school administrators and school employees at each school site shall be required to complete annual professional development training in school bullying prevention, identification, response, and reporting that meets the requirements of 70 O.S. § 24-100.4(A) and 210:10-1-20. Training shall be chosen by the district , however, supplemental training at each site may be chosen based upon the recommendation of the Safe School Committee established at the site.
St. Paul's Community School is committed to providing annual training to students regarding identifying, preventing, addressing, and reporting incidents of bullying. Such educational programs may include, but are not limited to, classroom discussion, assemblies, multimedia, and presentations. The purpose of the educational programs is to assist students in the identification of bullying behaviors, reporting procedures, and the consequences for violation of school policy.

Bullying Prevention Leads
The principal of each school site in this district shall designate at least one Bullying Prevention Lead ("BPL") who ensures that policy is understood, communicated and practiced at the site level. The duties of the Bullying Prevention Lead shall be as follows:

1. To report and track the number of documented and verified incidents of bullying to the Director of Counseling and Advocacy.
2. To establish and maintain the confidentiality of reports of incidents of bullying as appropriate;
3. To publicize the procedures for reporting set forth in this policy to all students, parents/legal guardians of students, and school employees;
4. To educate the school and community about bullying prevention measures; and,
5. To review, monitor, and suggest strategies for improvement of the school climate in order to facilitate prevention and intervention of bullying incidents in the school site and promote a school culture of intolerance of bullying behaviors;
6. To serve on the Safe School Committee and make recommendations for bullying prevention education, professional development, and/or policies and procedures pertaining to bullying prevention; and
7. Any other duties deemed necessary by school administrators and/or the Safe School Committee to facilitate bullying prevention at the school site.

III. REPORTING AND DOCUMENTING BULLYING

Students, parents, and staff shall be informed of the process for reporting incidents of bullying and encouraged to report all incidents of bullying. Incidents of bullying shall be reported on the "Student Incident Form" which shall be made available to students at all times during regular school hours, including in the main/front office of the school site, the office of the school counselor and any other locations recommended by the Safe School Committee at each school site. If any person is aware of or sees a victim of bullying as defined in this policy, such person must immediately report to the Bullying Prevention Lead or a principal of the building. Reports may be made anonymously; however, no formal disciplinary action will be taken solely on the basis of an anonymous report. Any written documentation of the alleged incident(s) shall be provided to the principal. If the bullying involves electronic communication as defined in the policy, a printed copy of the communication as well as any identifying information, such as an email or web address, shall be provided to the principal.

Individuals who may report incidents of bullying - Incidents of bullying at each school site in this district may be reported by any student, parent, school employee, or member of the public. Any school employee who has reliable information that would lead a reasonable person to suspect that an individual at the school is currently or has been the target of one or more incidents of bullying shall be required to report the information to the school's principal or assistant principal. Failure by school employees to report incidents of bullying in accordance with the requirements of this policy may result in disciplinary action.

Privacy and Confidentiality - Reports of bullying shall be kept confidential to the extent necessary to ensure compliance with the provisions of the *Family Education and Privacy Rights Act* (FERPA) and to protect students who report incidents of bullying from retaliation.

Anonymous reporting- In order to ensure individuals may report incidents without fear of retribution or retaliation, every school site in this district shall provide at least one method of anonymous reporting of incidents of school bullying that protects the identity of the individual reporting the incident. However, an anonymous report shall not be the sole basis for formal disciplinary action in response to an incident of bullying.

False Reporting - Students will receive recurring education regarding behavioral expectations, understanding bullying and its negative effects, disciplinary consequences for infractions, reporting methods and consequences for those who knowingly make false reports. Any person who knowingly makes false accusations against another person will be appropriately disciplined pursuant to District policy. Any accusations confirmed to be false will be removed from the falsely accused student's file.

Tracking reports of incidents of bullying- All reports of bullying shall be tracked using methods that will enable the BPL and administrators of each school site to identify emerging patterns of bullying over extended periods of time.

Notification to the parents or legal guardians- Parents and legal guardians of the reported victim of bullying will be notified by phone and/or email immediately if possible but no longer than three (3) school days from the receipt of the report of

bullying. The parents and legal guardians of the offender(s) will be notified by phone and/or email within (3) school days of the report.

Family Responsibilities - Parents/guardians are strongly encouraged to;

1. Report bullying when it occurs and complete an incident report form;
2. Take advantage of opportunities to talk to their children about bullying;
3. Inform the school immediately if they think their child is being bullied or is bullying other students;
4. Watch for symptoms that their child may be a victim of bullying and report those symptoms; and
5. Cooperate fully with school personnel in identifying and resolving incidents.
6. Consider carefully the unintended consequences of using social media to address bullying.

IV. INVESTIGATING

The following procedures will be used by any person for the processing and resolution of a reported incident of bullying or threatening behavior. The procedures are to be followed by the administration of the school district in an effort to determine the severity of the incident and the potential to result in future violence.

The procedure for investigating reported incidents of bullying or threatening behavior is as follows:
Initiation of investigation -An investigation shall be initiated by an administrator promptly but no later than 3 school days after receipt of the report of an incident of bullying. All interviews with individuals involved in the incidents, their parent(s)/legal guardian(s), and/or witnesses shall be documented. A student's parent/legal guardian shall be permitted to be present at the interview of a student upon request of the student or the student's parent/legal guardian.

1. All investigations shall be documented.
2. If it is determined that the school district's discipline code has been violated, an administrator shall follow district policies regarding the discipline of the student.
3. All verified acts of bullying which may constitute criminal activity or reasonably have the potential to endanger school safety may be reported to local law enforcement.
4. Upon completion of the investigation, an administrator or Director of Counseling and Advocacy may recommend that available community mental health care or other counseling options be provided to the student, if appropriate. This may include information about the types of support services available to the student with bullying behavior, victim, and any other students affected by the prohibited behavior. If such a recommendation is made, the administration shall request disclosure of any information that indicates an explicit threat to the safety of students or school personnel provided the disclosure of information does not violate the provisions or requirements of the Family Educational Rights and Privacy Act (FERPA) of 1974, the Health Insurance Portability and Accountability Act (HIPAA) of 1996, Section 2503 of Title 12 of the Oklahoma Statutes, Section 1376 of Title 59 of Oklahoma Statutes, or any other state or federal laws relating to the disclosure of confidential information.
5. Upon completion of an investigation, timely notification shall be provided regarding the resolution of the investigation to the parents or guardians of the victim. This information should be provided promptly but no later than 10 school days of the conclusion of the investigation.
6. Upon completion of an investigation, timely notification shall be provided regarding the resolution of the investigation to the parents or guardians of the offender. This information should be provided promptly but no later than 10 school days of the conclusion of the investigation.

V. INTERVENTION AND RESPONSE

In administering discipline, consideration will be given to alternatives to traditional punishment, to ensure that the most effective discipline and support is administered in each case.
Punitive measures can include but will not be limited to:

- Detention
- In school placement
- Suspension (out of school)
- Change in school placement

Alternatives to punitive measures include but are not limited to those below:

- Referral to counselor
- Conference with student

- Conference with parents
- Behavior contract
- Adjustment of school class schedule
- Referral to Community Mental Health
- School Restoration Program
- Community service
- Referring student to appropriate social agency or to a delinquency prevention and diversion program administered by the office of Juvenile Affairs
- Other appropriate disciplinary action as required and as indicated by the circumstances which may include, but is not limited to, restrictions of privileges such as removal from eligibility to participate or attend extracurricular activities as well as removal from the privilege of attending or participating in certain school activities, and/or class.

This list does not reflect a sequence of events to follow in disciplinary actions. The district's bullying coordinator and individuals designated as school site investigators will receive additional training regarding appropriate consequences and remedial action for offenders, helping targets of bullying, and the district's strategy for counseling and referral for all those affected by bullying.

Reporting Bullying to the Oklahoma State Department of Education
In order to assist the State Department of Education with compliance efforts pursuant to the School Safety and Bullying Prevention Act, 70 Okla. Stat. Sec. 24-100.2 et seq The District has implemented a strategy for publication and distribution of this policy and accompanying forms, and procedures for reporting and investigation of incidents of school bullying. Publication and distribution shall comply with the provisions of 70 Okla. Stat. Sec. 24-100.4 and 210:10-1-20, and shall at a minimum meet all of the following requirements:

1. Annual written notice of this bullying policy shall be provided to parents, guardians, staff, volunteers, and students at each school. Notice of the policy shall be posted at various locations within each school site, including, but not limited to school cafeterias, bulletin boards, and administration offices. The written notice provided to students shall be written in age-appropriate language to ensure comprehension by younger students and provided with accommodations as necessary to ensure accessibility to students with disabilities.
2. A copy of this policy shall be posted on the District's website. In addition, each school site that has its own separate website shall post a copy of this policy and all accompanying forms and procedures on its website.
3. Each school site shall include a copy of this policy in its student and employee handbooks.
4. Any school community member is encouraged to report bullying incidents to the State Department of Education after following the District's chain of command–generally Principal, Director of Elementary/Secondary Education, Executive Director of Student Services, Superintendent, Board of Education.

USDE Office for Civil Rights
Educational institutions have a responsibility to protect every student's right to learn in a safe environment free from unlawful discrimination and to prevent unjust deprivations of that right. The Office for Civil Rights enforces several Federal civil rights laws that prohibit discrimination in programs or activities that receive federal financial assistance from the Department of Education.

1. Discrimination on the basis of race, color, and national origin is prohibited by Title VI of the Civil Rights Act of 1964.
2. Discrimination on the basis of sex is prohibited by *Title IX of the Education Amendments of 1972*. NPS Board policy #4000 identifies "sex discrimination" as including identification as male or female, sexual orientation, gender identity or gender expression. The District's Bullying Policy is available to students alleging bullying on the basis of sex as well as other types of bullying. However, an individual whose claim is based on sexual harassment may prefer to file their complaint utilizing the District's procedures in Board Policy 4000 - Title IX-Sex Discrimination and Sexual Harassment.
3. Discrimination against persons with disabilities is prohibited by Section 504 of the Rehabilitation Act of 1973 and Title II of the Americans with Disabilities Act of 1990.
4. Discrimination on the basis of age is prohibited by Age Discrimination Act of 1975.

Visit https://www2.ed.gov/about/offices/list/ocr/docs/howto.html to learn more about filing a discrimination complaint with USDE's Office of Civil Rights.