GATEWAY

ANTI-BULLYING POLICY

Gateway defines “bullying” (including “cyber bullying”) as any severe or pervasive physical or verbal act or conduct, including communications made in writing or electronically, directed toward a student(s) that has or can be reasonably predicted to have the effect of one or more of the following:

1) Placing a student(s) in reasonable fear of harm to the student(s) person or property;
2) Causing a substantially detrimental effect on the student(s) physical or mental health;
3) Substantially interfering with a student(s) academic performance; or
4) Substantially interfering with a student(s) ability to participate in or benefit from the services, actives, or privileges provided by Gateway.

Bullying may take various forms, including without limitation one or more of the following: harassment, threats, intimidation, stalking, physical violence, sexual harassment, sexual violence, threat, public humiliation, destruction of property, or retaliation for asserting or alleging an act of bullying. Such behavior includes direct physical contact, such as hitting or shoving, verbal assaults, such as teasing or name-calling, digital or electronic harassment, and social isolation or manipulation. Making false reports or accusations will also be considered bullying and an act of harassment. This list is meant to be illustrative and non-exhaustive.

Gateway believes that all students have a right to a safe and healthy environment. Gateway's academic, clinical, and residential community has an obligation to promote mutual respect, tolerance, and acceptance.

Bullying, in any form, is contrary to the policies of Gateway and placing school districts, as well as Utah State Law (See Utah Code 53G-9-6), and Illinois State Law (see 105 ILCS 5/27-23).

Gateway will not tolerate behavior that infringes on the safety of any student. Gateway expects students and/or staff to immediately report incidents of bullying to a clinician, teacher, Manager or Company Director. Staff who witness such acts shall take immediate steps to intervene when safe to do so. Each complaint of bullying should be promptly investigated. This policy applies to students on Gateway's campus, while traveling to and from Gateway or on a Gateway-sponsored activity, whether on or off campus.

To ensure bullying does not occur, Gateway will provide staff development training in bullying prevention and cultivate acceptance and understanding in all students and staff to build Gateway's capacity to maintain a safe and healthy learning environment.

Teachers will discuss this policy with all students during new term orientation in age-appropriate ways and should assure them that they need not endure any form of bullying. Students who bully are in violation of this policy and are subject to disciplinary action up to and including school expulsion or discharge.

Students at Gateway will sign a Student Code of Conduct to be followed while on Gateway's campus, while traveling to and from Gateway or on a Gateway-sponsored activity, whether on or off campus.

Procedures for Bullying Reporting

Consistent with Federal and State laws and rules governing student privacy rights, the procedures at Gateway for the reporting of bullying behavior are as follows:

- Direct reports may be made to any clinician, teacher, Manager or Company Director, including but not limited to the Clinical, Academic, Program, or Executive Directors.

● Anonymous reports can be made by filling out a client grievance form or just writing a note and placing it in any Director's box in the administrative hall.

● Parents and the treatment team of any student(s) involved in alleged bullying events will be notified by a manager, Director, or the student(s) clinician. Clinicians of each student involved will also be available for and be extra aware of students involved in incidents of bullying.

Procedures for Bullying Investigation

Consistent with Federal and State laws and rules governing student privacy rights, any reports of bullying will be promptly investigated and addressed by the student(s) treatment team members. The first part of this investigation will be to determine if the reported act falls within the permissible scope of Gateway's jurisdiction. Gateway will provide the victim(s) with information regarding services that are available within the Gateway community. These services include counseling, support services, and psychological services.

● All reasonable efforts will be made to complete the investigation within ten (10) school days after the date the report of the incident of bullying was received and taking into consideration additional relevant information received during the investigation about the reported incident of bullying.

● All appropriate school, residential and clinical staff members will be included in the investigation process.

● The Clinical and Academic Directors will be notified as soon as possible when a report is made.

● Consistent with Federal and State laws and rules governing student privacy rights and providing parents of the students who are parties to the investigation information about the investigation and an opportunity to meet with the Gateway Directors, teachers, or clinicians to discuss the investigation and its findings and the actions taken to address the reported incident of bullying.

Procedures for Bullying Intervention

The procedures (consistent with Federal and State laws and rules governing student privacy rights) for intervening in bullying behavior are as follows:

● Gateway will make reasonable efforts to keep a report of bullying and the results of investigation confidential. Any reprisal or retaliation against any person who reports an act of bullying is strictly prohibited. Any individual who engages in actions that are deemed to be retaliation for a bullying report will be dealt with immediately. For staff members that could be probation or termination of employment.

● Staff who witness acts of bullying shall take immediate steps to intervene when safe to do so. People witnessing or experiencing bullying are strongly encouraged to report the incident; such reporting will not reflect on the target or witnesses in any way.

● Interventions that may be taken include, but are not limited to, clinical services and counseling, restorative measures, social-emotional skill building, psychological services, group therapy and other campus-based services.

Conflict Resolution Policy

Gateway believes that all students have a right to a safe and healthy environment. Part of a healthy environment is the freedom to openly disagree. With this freedom comes the responsibility to discuss and resolve disagreements with respect for the rights and opinions of others.

To prevent conflict, Gateway will incorporate conflict resolution education and problem-solving techniques into the school curriculum and Gateway programming. This is an important step in prompting respect and acceptance, developing new ways of communicating, understanding, and accepting differing values and cultures within the Gateway community and helps ensure a safe and healthy learning environment.

Gateway will provide training to develop the knowledge, attunes, and skills students need to choose alternatives to self-destructive, violent behavior and dissolve interpersonal and intergroup conflict.

Policy Evaluation Procedure

All incidents of bullying will be reviewed on a semi-annual basis to gauge the effectiveness of the policy and interventions. This assessment will look at:

- The frequency of victimization.
- Student, staff, and family observations of safety at Gateway.
- Identification of areas of Gateway where bullying occurs.
- The types of bullying that are common or occurring.
- Bystander intervention or participation.

The information developed as part of the evaluation process will be provided to Gateway Directors and administrators and contracting school districts, school personnel, parents, and students.

Policy Notification Procedure

This policy will be posted on the Gateway website and all staff, students and their parents will receive a summary of this policy prohibiting intimidation and bullying at the beginning of the school year, as part of the student handbook and/or information packet, as part of new student enrollment, and as part of Gateway's system's notification to parents.

Student Code of Conduct

The Student Code of Conduct includes the following:

- Any student who engages in bullying may be subject to disciplinary action.
- Students are expected to immediately report incidents of bullying to a clinician or Director.
- Students can rely on staff to promptly investigate each complaint of bullying in a thorough and confidential manner.
- If the complainant student feels that appropriate resolution of the investigation or complaint has not been reached, the student should contact a Gateway Director. Gateway prohibits retaliatory behavior against any complainant or any participant in the complaint process.
- Students are to resolve their disputes without resorting to violence.
- Students, especially those trained in conflict resolution, are encouraged to help fellow students resolve problems peaceably.
- Students can rely on staff trained in conflict resolution strategies to intervene in any dispute likely to result in violence.
- Students needing help in resolving a disagreement, or students observing conflict may contact an adult.
- Students involved in a dispute will be referred to a clinician or Director. Clinicians and Directors shall keep the discussions confidential.
- Conflict resolution procedures shall not supplant the authority of staff to act to prevent violence, ensure Gateway safety, maintain order, and discipline students.