



PROCEDURES: **Safe 2 Say Something**

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REVISED:

Overview

In accordance with law, the Bethlehem Area School District establishes the following procedures for receiving, assessing and responding to reports received from the Safe2Say Something anonymous reporting program of the Pennsylvania Office of the Attorney General. (24 P.S. 1303-D)

These procedures establish a framework within which district administrators and staff will operate and coordinate with the county emergency dispatch center and local law enforcement agencies.

Safe2Say Something reports may be submitted by any individual, including students, parents/guardians, staff and others as a secure and anonymous report about unsafe, potentially harmful, dangerous, violent or criminal activities in a school entity or threat of such activities in a school entity through:

1. A twenty-four (24) hours a day, seven (7) days a week telephone hotline maintained by the Office of the Attorney General's Safe2Say Something Crisis Center;
2. A Safe2Say Something program secure website; or
3. A Safe2Say Something software program application, or "app" accessed through a mobile electronic device.

Reports may be submitted through one of these methods for an identified K-12 school anywhere in the state. Anonymous reports will be triaged by the Safe2Say Something Crisis Center and delivered to the appropriate school entity based on the location of the identified school, and county emergency dispatch center, where applicable, by Crisis Center staff through telephone communication, text and/or email.

Report Categorization

Reports, also known as tips, will be analyzed by the Safe2 Say Something Crisis Center and categorized as either Life Safety or Non-Life Safety based on definitions determined and approved by the Office of the Attorney General.

The following list provides examples of incidents, concerns or threats that may be categorized as Life Safety or Non-Life Safety, and is not an all-inclusive list.

Safe2SaySomething Defintions		
Life Safety - Imminent and In-Progress	Non-Life Safety - Crime or Violence	Non-Life Safety
Active Shooter or presence of explosive device	Alcohol possession or use	Anger issues/management (non-life threatening)
Bodily injury and/or emergency condition	Animal cruelty	Breaks school code of conduct
Child predator	Cannabis/Other drug paraphernalia	Bullying/cyber-bullying/general teasing
Dating violence	Distribution of inappropriate photos	Creating a hostile environment
Disorderly/dangerous conduct	Drunk and/or under influence of other substances	Depression/anxiety (non-life threatening)
Domestic violence/victimization	Forgery/falsifying documents	Discrimination
Drug use, distribution/sale, and/or substance abuse	Graffiti and/or other defacing of property	Drug use NOT in progress
Emergency building condition (fire, collapse, explosion)	Hate crime/speech	Eating Disorder/anorexia/bulimia
Gang violence/formation/threats	Sexting	General harassment of students/staff
Have attempted suicide and are requesting help	Theft	General school complaint
Human Trafficking	Threat/ideation of performing a false alarm	Inappropriate behavior, language, gestures
Individual is unconscious/unresponsive	Tuancy/skipping school	Inappropriate bus behavior
Intend/threaten/ideate to commit suicide	Vandalism	Inappropriate intimidating physical contact
Intend/threaten/ideate to harm another person		Inappropriate use of technology/school equipment
Intend/threaten/ideate to harm building/property		Intention, discussion, and/or planning of any hazing
Missing/lost student, educator, and/or administrator		Mean/cruel towards others
Physical Abuse		Planned parties
Planned attack, shooting, fight/assault		Possession of lighter/matches
Presence of weapons (guns, knives, explosive)		Sexual harassment
Reckless driving on school property		Smoking tobacco, e-cigs, or vapes
Sexual Assault/Rape		Verbal abuse
Terrorism threat and/or ideation		

The Safe2Say Something Crisis Center will forward reports to a team, established by the district, via telephone communication, text and/or email, depending on the nature and categorization of the report received:

Life Safety Reports – Delivered twenty-four (24) hours a day, seven (7) days a week via telephone call, email and text message to the district’s designated Crisis Team. A call is made to one (1) team member at a time through a list designated by the district until someone answers the call and verbally confirms that they will review the report.

Non-Life Safety Reports – Delivered daily via email and/or text message between 6:00 a.m. and 6:00 p.m. to the district’s designated Crisis Team.

The district’s designated team will respond to Life Safety and Non-Life Safety Reports in accordance with these procedures.

Crisis Team

The Superintendent, School Safety and Security Coordinator or designee will establish a Crisis Team of three (3) to five (5) members, who will be designated, registered and trained to receive Safe2Say Something reports for all school buildings in the district.

The BASD Crisis Team will be comprised of the following 5 individuals:

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1. Dr. Joseph Roy – Superintendent
2. Todd Repsher – Coordinator of School Safety and Emergency Management
3. Vivian Robledo-Shorey – Director of Student Services
4. Claire Hogan – Chief Pupil Services Officer
5. Mark Stein – Chief of Facilities and Operations

For purposes of communication, training and administration of district information in the Safe2Say Something program, the Coordinator of School Safety and Emergency Management will be designated as the Crisis Team lead administrator. The lead administrator will be responsible for updating contact information for all school buildings and designated Crisis Team members in the Safe2Say Something program, and determining the priority order of team members to receive calls about Life Safety reports.

Additional staff members may be assigned to the Crisis Team, on an as needed basis, for assessment and response support, but will not be required to receive the Safe2Say Something Crisis Center reports. Additional staff members may include:

1. Building Principal
2. Director of Special Education
3. Guidance Counselor
4. School Psychologist
5. School Resource Officer

The Crisis Team will meet on a regular basis to assess school climate, monitor trends in reporting among specific students or groups of students who may need additional supports, determine the need for additional training of students and/or staff and prepare reports for district administration and/or the Board.

Training

The Crisis Team lead administrator and team members designated to receive reports from the Crisis Center must attend training designated by the Safe2Say Something program. Training must include practicing report handling in the system.

The Crisis Team will ensure that middle school and high school students and other staff members are provided with training in how to make reports and also awareness on risk factors and the importance of reporting. Training may include online and interactive video training. The district will make awareness materials available to parents/guardians and community members as well.

Confidentiality

Crisis Team members will receive training regarding confidentiality and the handling of student and staff information, in accordance with applicable laws, regulations, Board policies,

administrative regulations, and procedures. (20 U.S.C. 1232g; Pol. 113.4, 207, 216, 236, 249, 324, 800, 819)

Confidentiality will be handled in accordance with these procedures and the district's legal and investigative obligations.

Crisis Team members whose other assignments and roles require confidentiality of specific student communications, in accordance with law, will ensure that all confidential communications and information are addressed in accordance with applicable law, regulations, Board policy and administrative regulations. (22 PA Code 12.12; 42 Pa. C.S.A. 5945; 42 Pa. C.S.A. 8337; Pol. 207)

Receiving Reports

Upon receipt of a report notification via telephone call, text message and/or email, each Crisis Team member will log in to the Safe2Say Something management program to retrieve the report. The Crisis Team may communicate with other team members regarding the report through the Safe2Say Something management program, or through established district processes and communication methods.

The Crisis Team will notify the Safe2Say Something Crisis Center through the Safe2Say Something management program if a report is received identifying a student who is not enrolled in the school district. Information on the student's current enrollment in another school or program will be provided to the Crisis Center, if known by the Crisis Team member responding to the report.

Law Enforcement Coordination

The Crisis Team lead administrator, in coordination with the Superintendent and/or School Safety and Security Coordinator, will schedule and facilitate meetings with the county emergency dispatch center and each local law enforcement agency that has jurisdiction over school property to discuss communication and handling of Life Safety reports from the Safe2Say Something program, and follow-up of Non-Life Safety reports as necessary.

Communication strategies and guidelines for handling reports will be documented in the biannual Memorandum of Understanding with local law enforcement agencies. (24 P.S. 1303-A; 22 PA Code 10.11)

Communication strategies and guidelines for handling reports with the county emergency dispatch center and with local law enforcement agencies will be documented by email.

The Crisis Team will coordinate with the county emergency dispatch center and local law enforcement agencies on Safe2Say Something reports in accordance with the documented guidelines.

When requested, designated Crisis Team members will provide student directory information, such as full name, address, home phone number, grade level, etc., to the county emergency dispatch center and/or local law enforcement agency with jurisdiction, in accordance with the Family Educational Rights and Privacy Act, and other applicable law, regulations and Board policies. The Crisis Team and/or Superintendent will consult the school solicitor regarding

questions on disclosure of student directory information if necessary. (20 U.S.C. 1232g; Pol. 113.4, 216)

The district will ensure that all Crisis Team members designated to receive Safe2Say Something program reports have continual access to the district's electronic student information system and have received authorization and training on handling student education records.

When a local law enforcement agency takes the lead in handling a Life Safety report, the designated Crisis Team member(s) will document this action and coordinate follow-up activities for students and/or staff based on the nature of the report, in accordance with procedures under Response below.

When a report is handled by the district's Crisis Team, and a determination is made to contact the local law enforcement agency to take protective action or report an incident, the district will coordinate with the local law enforcement agency in accordance with documented guidelines, the Memorandum of Understanding, and applicable laws, regulations and Board policies. (24 P.S. 1302.1-A, 1303-A; 22 PA Code 10.2, 10.21, 10.22; Pol. 113.1, 218, 805.1)

Assessment and Response

Members of the Crisis Team receiving Safe2Say Something reports will identify if the report is a Life Safety or Non-Life Safety report. Crisis Team members will make a determination about whether to anonymously communicate with the reporter, if possible, through the Safe2Say Something management program for additional information based on:

1. The nature of the report and the scope of information provided initially.
2. The recommendation of the county emergency dispatch center and/or local law enforcement agency, when applicable.
3. The training and experience of the Crisis Team member(s).

Reports received initially from the Safe2Say Something Crisis Center will have inappropriate images and attachments blocked, including images that may be considered obscene or pornography; however, Crisis Team members should be aware that images and attachments may be added by the reporter in follow-up responses and communication. If images or other content that could be considered obscene or pornography are added to the report, Crisis Team members will contact the Superintendent, who will coordinate with the school solicitor and/or local law enforcement agency, in handling such images and attachments that are received, and addressing their disposition in the Safe2Say Something management program. Such images and attachments should not be disseminated or downloaded beyond the reporting system until such coordination occurs and further direction is provided. Under no circumstances should images constituting pornography be downloaded or saved to a school-issued or school-owned electronic device or computer, or printed into a paper or other format.

Pornography includes, but is not limited to:

1. Any visual or audio depiction, including any photograph, digital image, film, video, picture, recording or computer or computer-generated image or picture, whether made or produced by electronic, mechanical, or other means, of sexually explicit conduct; and
2. Nude pictures or images of the genitalia of any male or female or the breasts of any female, including any photograph, digital image, film, video, picture, or computer or computer-generated image or picture of such.

Obscene includes any material, if:

1. The average person applying contemporary community standards would find that the subject matter taken as a whole appeals to the prurient interest;
2. The subject matter depicts or describes in a patently offensive way, sexual conduct described in the law to be obscene; and
3. The subject matter, taken as a whole, lacks serious literary, artistic, political, educational or scientific value.

Coordination with Other School Entities

The Crisis Team will contact and coordinate with other school entities in assessing and responding to a report if an identified student that is the subject of a report is enrolled in the district and also attends another school, such as a Career and Technical Education program, approved private school placement or intermediate unit program.

Life Safety Reports

The Crisis Team will coordinate with the county emergency dispatch center and local law enforcement agencies when assessing and responding to Life Safety reports. Coordination may include, but not be limited to:

1. Providing student or staff information for immediate response by law enforcement.
2. Providing required information to the Incident Command Post in an emergency situation. (22 PA Code 10.24)
3. Notification of the school community.
4. Cooperating in joint investigation and response to a report.
5. Providing care, support and/or ongoing monitoring following the resolution of a report.

The Crisis Team, in consultation with the building principal, Superintendent and local law enforcement agency, will determine if the parent(s)/guardians(s) of a student(s) identified in or the subject of a report should be notified concerning a report, based on the nature of the report and the need for ongoing investigation.

Non-Life Safety Reports

Note: Non-Life Safety reports may be updated to Life Safety status by the Safe2Say Something Crisis Center if additional updates are made by the reporter that indicate the need to revise the status.

1. The Crisis Team members receiving a report will determine if additional members of the Crisis Team should meet to assess and respond to a report.
2. The Crisis Team may reach out to and include other staff who are familiar with the student and/or situation in assessing and responding to a report.
3. The Crisis Team may coordinate with the Superintendent or designee to consult the school solicitor in assessing and responding to a report.
4. The Crisis Team, in consultation with the building principal and/or Superintendent, will determine if the parent(s)/guardians(s) of a student(s) identified in or the subject of a report should be notified concerning a report, based on the nature of the report and the need for ongoing investigation.

Relation to Board Policies/Administrative Regulations/Procedures

In assessing and responding to reports, the Crisis Team will make a determination if handling the report should be done under one or more specific Board policies, administrative regulations or district procedures, based on the subject matter of the report. Policies that may address Safe2Say Something report subjects include, but are not limited to:

1. Bullying/Cyberbullying. (Pol. 249)
2. Suicide Awareness, Prevention and Response. (Pol. 819)
3. Child Abuse. (Pol. 806)
4. Student Assistance Program. (Pol. 236)
5. Student Discipline. (Pol. 218)
6. Weapons. (Pol. 218.1)
7. Terroristic Threats. (Pol. 218.2)
8. Controlled Substances/Paraphernalia. (Pol. 227)
9. Tobacco/Nicotine. (Pol. 222, 323)
10. Searches. (Pol. 226)
11. Hazing. (Pol. 247)
12. Nondiscrimination/Discriminatory Harassment. (Pol. 103, 104)
13. Dating Violence. (Pol. 252)

14. Emergency Preparedness. (Pol. 805)
15. Employee Conduct/Disciplinary Procedures and/or Educator Misconduct. (Pol. 317)
16. Maintaining Professional Adult Student Boundaries. (Pol. 824)

Assessment

In assessing Safe2Say Something reports, the Crisis Team will follow a standard practice, which may include, but not be limited to:

1. Interviewing students, staff, parents/guardians or others regarding the subject(s) of the report.
2. Reviewing existing academic, disciplinary and/or personnel records and assignments, as appropriate, regarding the subject(s) of the report.
3. Conducting searches of lockers, storage spaces, and other possessions on school property as applicable, in accordance with applicable law, regulations and Board policy. (Pol. 226)
4. Examining outside resources such as social media sites or coordinating with community agencies that may provide additional information about the subject(s) of the report, in accordance with law, regulations and Board policies.
5. Where appropriate, convening the appropriate team to assess and/or address the situation that is the subject of the report, such as the Individualized Education Program (IEP) team, Section 504 Team, Behavior Support team, Child Study team, Student Assistance Program team, or others. (Pol. 103.1, 113, 113.1, 113.2, 113.3, 236)
6. Adding notes or attachments to the report in the Safe2Say Something management program for communication and coordination among the members of the Crisis Team, in accordance with the Family Educational Rights and Privacy Act, and other applicable law, regulations and Board policies. (20 U.S.C. 1232g; Pol. 113.4, 216)

The Crisis Team will conduct interviews and investigations in accordance with applicable laws, regulations, Board policies and administrative regulations, and will respect the rights and confidentiality of students, staff, parents/guardians and others in assessing and responding to Safe2Say Something reports. (Pol. 103, 104)

Threat Assessment Considerations

The Crisis Team will consider the following threat assessment themes from the United States Secret Service and coordinate with the appropriate law enforcement agency in assessing a report of potential violence by an individual:

1. The individual's motives and goals.
2. Concerning, unusual or threatening communications.

3. Inappropriate interest in weapons, school shootings, mass attacks or other types of violence.
4. Access to weapons.
5. Stressful events, such as setbacks, challenges or losses.
6. Impact of emotional, developmental and/or behavioral health issues.
7. Evidence of desperation, hopelessness or suicidal thoughts and gestures.
8. Whether the individual views violence as an option to solve problems.
9. Whether others have expressed concern about the individual's statements or behaviors.
10. Capacity to carry out an attack.
11. Evidence of planning for an attack.
12. Consistency between the individual's statements and actions.
13. Protective factors such as positive or prosocial influences and events.

Response

Following assessment and coordination with other teams and individuals as necessary, the Crisis Team will recommend and/or implement one or more responses to address the Safe2Say Something report. The timeline for assessment and response, as well as the number and nature of responses, will vary based on the nature and complexity of the report. Responses may include but not be limited to:

1. Counseling – this may include counseling within or outside of the school. (Pol. 112)
2. Monitoring – monitoring may be done by the Crisis Team, a Child Study team, IEP team, or other appropriate team of individuals within the district.
3. Parental notification, as appropriate.
4. Review of appropriate plan or support – this may include a review of a student's IEP, Section 504 Service Agreement, Behavior Support Plan, Student Assistance Program, Employee Assistance Program, or other type of plan or system of support. (Pol. 103.1, 113, 113.2, 146, 236)
5. Immediate intervention – this may include an immediate assessment or action through student services, Student Assistance Program, a crisis response team, local law enforcement and/or a community agency.
6. Outside referral – this may include an outside referral to a behavioral health resource, medical provider, community agency, or other outside or contracted service or provider. (Pol. 146, 236)*The district will ensure that memoranda of understanding are developed*

with outside resources, centers and agencies with whom the district develops cooperative agreements for student or staff referrals.

7. Investigation/School discipline – this may include investigation and/or discipline under a specific Board policy as noted above, such as an investigation of bullying/cyberbullying or hazing, or discipline, up to and including suspension and expulsion, in accordance with law, regulations, Board policy and administrative regulations. (Pol. 218, 233, 247, 249, 317)
8. Reporting/Law enforcement action – this may include a referral to local law enforcement in accordance with the Memorandum of Understanding, reporting in accordance with Safe Schools incident reporting, or other types of required reporting to state or federal agencies. (Pol. 103.1, 113.1, 113.2, 218, 218.1, 218.2, 222, 227, 317.1, 323, 351, 805.1, 806, 904)

Interplay with Child Protective Services Law

The Crisis Team will respond to Safe2Say Something reports involving suspected child abuse in accordance with Board policy and the Child Protective Services Law, and will follow the requirements for making a mandated report, even if the county emergency dispatch center or law enforcement agency has also received the Safe2Say Something report. When a report of suspected child abuse is made by a school employee as a member of the Crisis Team, the district is not required to make more than one (1) report. An individual otherwise required to make a report who is aware that an initial report has already been made by a school employee, is not required to make an additional report. (23 Pa. C.S.A. 6305, 6311, 6313; Pol. 806)

Safe Schools Incident Reporting

For Safe Schools reporting purposes, the term **incident** will mean an instance involving an act of violence; the possession of a weapon; the possession, use, or sale of a controlled substance or drug paraphernalia as defined in the Pennsylvania Controlled Substance, Drug, Device and Cosmetic Act; the possession, use, or sale of alcohol or tobacco; or conduct that constitutes an offense listed under the Safe Schools Act. (24 P.S. 1303-A; 22 PA Code 10.2; 35 P.S. 780-102)

In accordance with Safe Schools reporting requirements, the Superintendent or designee will immediately report required incidents and may report discretionary incidents committed by students on school property, at any school-sponsored activity or on a conveyance providing transportation to or from a school or school-sponsored activity to the local police department that has jurisdiction over the school's property, in accordance with state law and regulations, the procedures set forth in the Memorandum of Understanding with local law enforcement and Board policies. (24 P.S. 1302.1-A, 1303-A; 22 PA Code 10.2, 10.21, 10.22; Pol. 113.1, 218, 805.1)

The Superintendent or designee will notify the parent/guardian of any student directly involved in an incident on school property, at any school-sponsored activity or on a conveyance providing transportation to or from a school or school-sponsored activity, who is a victim or suspect, immediately, as soon as practicable. The Superintendent or designee will inform the parent/guardian whether or not the local police department that has jurisdiction over the school

property has been or may be notified of the incident. The Superintendent or designee will document attempts made to reach the parent/guardian. (22 PA Code 10.2, 10.25; Pol. 805.1)

Students With Disabilities

When reporting an incident committed by a student with a disability to a law enforcement agency, the district will provide the information required by state and federal laws and regulations and will ensure that copies of the special education and disciplinary records of the student are transmitted for consideration by these authorities. The district will transmit copies of the student's special education and disciplinary records only to the extent that the transmission is permitted by the Family Educational Rights and Privacy Act. (20 U.S.C. 1232g, 1415; Pol. 113.1, 113.4, 216)

For purposes of protection and continuity in handling students with disabilities, the district will provide a copy of its administrative regulations and procedures for behavior support, developed in accordance with the Special Education Plan, to each local police department that has jurisdiction over school property. Updated copies will be provided each time the administrative regulations and procedures for behavior support are revised by the district. (22 PA Code 10.23, 14.104; Pol. 113, 113.2, 805.1)

The district will invite representatives of each local police department that has jurisdiction over school property to participate in district training on the use of positive behavior supports, de-escalation techniques and appropriate responses to student behavior that may require intervention, as included in the district's Special Education Plan and positive behavior support program. (22 PA Code 10.23, 14.104, 14.133; Pol. 113, 113.2, 805.1)

Closure and Documentation

Crisis Team members designated to receive Safe2Say Something reports will coordinate and ensure that all reports are officially closed in the Safe2Say Something management program.

The Crisis Team will coordinate with the county emergency dispatch center and local law enforcement agencies in documenting responses to reports and/or handling student information and records, in accordance with these procedures, the Memorandum of Understanding with local law enforcement, and applicable laws and regulations.

Notes briefly detailing ongoing response activities or resolution of the report must be noted as applicable in the Safe2Say Something management program and shared with other members of the Crisis Team, in accordance with the Family Educational Rights and Privacy Act, and other applicable law, regulations and Board policies. (20 U.S.C. 1232g; Pol. 113.4, 216)

The Superintendent or designee will direct the Crisis Team to submit a report Quarterly to the administration on aggregate data of Safe2Say Something program reports and responses.

By June 30, 2019 and each year thereafter, the School Safety and Security Coordinator shall report to the Board regarding safety and security practices and coordinate a biennial tour of the

schools with local law enforcement primarily responsible for protecting and securing the school buildings.

The School Safety and Security Coordinator will develop reports, databases and/or files for documenting and storing information regarding Safe2Say Something reports, assessments, resolutions and follow-up responses.

Documentation from Safe2Say Something reports that includes specific student information will be handled by the district in accordance with applicable laws, regulations, Board policies, administrative regulations, and procedures. (20 U.S.C. 1232g; Pol. 113.4, 207, 216, 236, 249, 800, 819)

Student Assistance Program documentation and follow-up information will be handled in accordance with Board policy, administrative regulations and program requirements. (Pol. 236)