GMS	Policies and Procedures Glen Mills Schools	Policy Number 12.6
Chapter: 12 - Program		
Subject: Student Grievance & Appeal Process		
Authority: Dr. Christopher R. Spriggs, Acting Executive Director	**Date of Issue: 1/5/2001** **Date of Re-issue: 3/15/2019** **Date of Re-issue: 1/24/2020** **Date of Re-issue: 3/11/2020**	

I. POLICY:

Students and the Student's family shall have the right to comfortably and easily initiate grievance procedures with The Glen Mills Schools (GMS) to address any alleged violation of specific or civil rights without fear of retaliation. These specific rights include but are not limited to, violation of lowering of the student's behavior rating in the residential living unit, staff misconduct or any actions by staff that the student or the student's parent/guardian does not agree with, student misconduct, and specific health and safety issues.

II. PROCEDURE:

A. Consistent with our trauma informed approach, the number one priority of GMS is ensuring the physical and emotional safety of the students. For that reason, the staff are expected to conduct themselves respectfully and professionally at all times, in each and every interaction, with every student. We encourage students to share any grievance or concern, in the least traumatic fashion, as set forth in this policy. It is our commitment that a student's grievance be fully heard and fairly considered in a timely manner, viewing and reviewing each incident, through a trauma-informed lens. The student will be an active participant in the consideration of the grievance, and there will be a full, fair, and timely appeal process if a grievance is determined to be without merit and a student disagrees with that finding. GMS decisions will be conducted with transparency, with the goal of building and maintaining trust with the student and family members, among staff, and others involved with the treatment services of each student. Furthermore, there will not be any form of retaliation towards a student who utilizes the grievance process.

B. GMS actively moves past cultural stereotypes and biases, and leverages the healing value of traditional cultural connections. This policy is responsive to the racial, ethnic and cultural needs of the students, and recognizes and addresses historical trauma, to ensure a safe and comfortable resolution to a grievance or any concern a student may experience.

C. The grievance policy shall be included in each copy of the GMS Student Handbook, which is given to each student and the student's parent/guardian upon arrival at the school. The policy will also be explained verbally to the student and family to ensure the student and family members are confidently empowered to voice any concerns or grievance while under our care.

D. Each student and the student's parent/guardian shall receive a Grievance Form (refer to the end of this policy) upon arrival, should the student or the student's parent/guardian feel the need to file a grievance with GMS. Forms will also be available in units and throughout campus. The student or the student's parent/guardian shall complete the Grievance Form and deposit the completed form in any grievance collection box in the units and/or throughout the common areas on campus.

E. Each student and the student's parent/guardian shall have the right to file a grievance with GMS for any alleged violation of specific or civil rights with out the fear of retaliation. Furthermore, each student and the student's parent/guardian shall have the right to file an abuse allegation with GMS without the fear of retaliation.

F. Grievances may be filed for any alleged violation of a "student right". As stated above, these rights include but are not limited to, alleged violations of the student's behavioral rating in the residential living unit, staff misconduct or any actions by staff persons that the student or the student's parent/guardian does not agree with, student misconduct, and specific health and safety issues. The student's specific rights are in the "student rights" section of the GMS Student Handbook.

G. Assistance by a Student Support Coordinator will be provided in the event the student has limited written communication skills and needs help completing the grievance form.

H. Levels

1. Level One - The student will complete the Grievance Form and deposit the form in any grievance collection box throughout campus. Regulatory Compliance Staff (or designee) will check the grievance collection boxes daily. The Regulatory Compliance Staff (or designee) will create the electronic record of the grievance in the portal within 24 hours, or next business day of receipt of a grievance. The 24 hour time clock starts once the electronic grievance record is created.
    a. Peer support and mutual self-help are key vehicles for establishing safety and hope, building trust, and enhancing collaboration. Therefore, the student may discuss his grievance with a peer. The student may do this during a student to student conversation, or unit meetings.
    b. The student may also discuss his grievance with his individual Student Support Coordinator, any Student Support Coordinator, School Counselor, his Student Success Team, or anyone the student feels at ease with,

internally or externally in order to navigate through the grievance in a comfortable fashion. Our staff are trained to understand that physical and psychological safety is a high priority and wish to establish interpersonal interactions to promote a sense of safety and comfort.

c. The Executive Director will ensure that due process is afforded to the Student.

2. Level Two - If the student is unable to resolve the grievance at Level One, the student should meet with the unit Student Support Supervisor regarding the grievance. The Student Support Supervisor shall record the investigation of the grievance and outcome in the electronic record. At each level an electronic record of the investigation and outcome of grievance investigation shall be completed by the responsible person. The Executive Director will ensure that due process is afforded to the Student.

3. Level Three - If the grievance is unresolved at Level Two, the student shall have the opportunity to meet with the Student Support Director regarding the grievance. The Executive Director will ensure that due process is afforded to the Student.

4. Level Four - If the grievance is unresolved despite the efforts in Levels One through Three, the student shall have the opportunity to meet and/or speak with external resources involved in the child's Individual Treatment Resiliency Plan (ITRP). GMS recognizes the importance of student empowerment and having the choice to resolve any concerns or grievance comfortably, to avoid any re-traumatization. Therefore, this shall include, but not limited to, his probation officer, social worker or referral agency representative, his parents/guardian, clergy, his attorney, or any of the agencies listed below. The Executive Director will ensure that due process is afforded to the Student.

Department of Human Services
Bureau of Equal Opportunity
Health & Welfare Building Rm 225
625 Forester St.
Harrisburg, PA 17105-2675
1-800-692-7462

Department of Human Services
Bureau of Equal Opportunity
Southeast Regional Office Suite 5034
801 Market St.
Philadelphia, PA 19107
1-215-560-2230

U.S. Department of Health & Human Services
Office of Civil Rights
150 S Independence Mall West-Suite 372
Philadelphia, PA 19106-9111
1-800-368-1019

Pennsylvania Human Relations Commission
110 N. 8th St, Suite 501
Philadelphia, PA 19107
1-215-560-2496

5. Level Five - If the grievance is unresolved or the student is not satisfied with the response to the grievance from Levels One through Four, the student will have the opportunity to have his grievance reviewed in front of a Grievance Panel. GMS recognizes the importance of collaboration and mutuality to demonstrate that healing happens in trustworthy relationships and in the meaningful sharing of decision making. The panel will be made up of various stakeholders (as available) involved in the child's treatment. The Executive Director will ensure that due process is afforded to the Student.

6. Level Six - If the grievance remains unresolved or the student is not satisfied with the response to the grievance, the student shall have the opportunity to file an appeal with the Executive Director regarding the grievance outcome. If due process has been afforded the student, the decision of the Executive Director is final. The Executive Director or designee will respond in writing within 72 hours upon receipt of the grievance.

I. Internal Tracking and Accountability - GMS utilizes an internal notification portal system which alerts the Student Support Supervisor, the Student Support Director, and the Executive Director through email once an electronic grievance record is created. Once an electronic grievance record is created, an automatically generated email will be sent every two hours to alert the status of the grievance and to insure the process is progressing toward a thorough and fair completion. This will continue until the grievance is closed.

1. Within one hour of the grievance record being created, the Student Support Director is notified. The grievance and investigation will be reviewed every two hours by the Student Support Director to insure the process is progressing towards a thorough and fair completion. Within 24 hours of the grievance record being created, the grievance and investigation will be reviewed by the Student Support Director (Level Three).

2. Within two hours of the grievance record being created, the Executive Director is notified. The grievance and investigation will be reviewed every two hours by the Executive Director to insure the process is progressing towards a thorough and fair completion. Within 72 hours of the grievance record being created, the

grievance appeal and investigation will be reviewed by the Executive Director (Level Six).

J. Resolution - If during the grievance investigation, a resolution is reached, the student shall sign the "Grievance Form" to verify a satisfactory conclusion to the grievance.

K. Notification of the grievance and any outcome of the investigation of the grievance will be sent to the student's parent/guardian and jurisdiction if applicable to insure trustworthiness and transparency throughout the process.

Glen Mills Schools Resident Grievance

1. Related information:
   Grievances will be investigated within 24 hours of report. Final response will be completed within 72 hours when possible. All students and/or parents/guardians have the right to file a grievance without fear of retaliation. The Executive Directive will ensure that due process is afforded to the student throughout the entire process.

2. Type of Grievance:
   Violation of Rights ____ Leveling Issues ____ Student Misconduct _____

   Staff Misconduct ____ Health & Safety Issues _____

   Other _____

3. Explanation: (Please explain your grievance, if more room is needed use back of form)

4. Grievance Process: Date Time Resolved

   Level One: (could include but not limited to:)
   Peer support, Individual Student Support Counselor
   School Counselor, Student Success Team

   _____ _____ yes ___ no ___

   Level Two: (could include but not limited to:)
   Unit Support Supervisor

   _____ _____ yes ___ no ___

   Level Three: (could include but not limited to:)
   Student Support Director

   _____ _____ yes ___ no ___

   Level Four: (could include but not limited to:)
   Probation Officer, Social Worker, Clergy, Attorney
   Referring Agency Representative, Dept. of Human Services

   _____ _____ yes ___ no ___

Level Five: (could include but not limited to:)
Grievance Panel comprised of stakeholders involved in student treatment

_____ _____ yes ___ no ___

Level Six:
Executive Director

_____ _____ yes ___ no ___

5. Resolution:

_____ _____

Student Signature Level Representative Resolving Grievance (signature)

_____

Date Grievance Resolved

3/2020