



School-wide Bullying Prevention Policy

Objectives and Purpose

A key responsibility of Ingenuity Prep is to provide services in a respectful and positive environment. Acts of bullying, harassment and intimidation are an attack on Ingenuity Prep's mission and core values. Thus, to facilitate our mission in consultation with youth, families, and staff, Ingenuity Prep has established this comprehensive bullying prevention policy. This policy protects the dignity and safety of the school community and describes the school's prevention strategies to identify and prevent incidents by connecting youth to necessary services. Ingenuity Prep will promptly report and investigate all incidents of bullying, harassment and intimidation and provide appropriate remedies for victims of an incident.

This policy serves as Ingenuity Prep's bullying prevention plan.

Definitions

Ingenuity Prep defines bullying as any severe, pervasive, or persistent act or conduct whether physical, electronic, or verbal that:

1. May be based on a youth's actual or perceived race, color, ethnicity, religion, national origin, sex, age, marital status, personal appearance, sexual orientation, gender identity or expression, intellectual ability, familial status, family responsibilities, matriculation, political affiliation, genetic information, disability, source of income, status as a victim of an intrafamily offense, place or residence or business, or any other distinguishing characteristic, or on a youth's association with a person, or group with any person, with one or more of the actual or perceived foregoing characteristics; and
2. Can reasonably be predicted to:
 - a. Place the youth in reasonable fear of physical harm to their person or property;
 - b. Cause a substantial detrimental effect on the youth's physical or mental health;
 - c. Substantially interfere with the youth's academic performance or attendance; or
 - d. Substantially interfere with the youth's ability to participate in or benefit from the services, activities, or privileges provided by Ingenuity Prep.

Prohibition against Bullying

Acts of bullying, including cyberbullying, whether by youth, volunteers or staff, are prohibited:

1. On Ingenuity Prep grounds and immediately adjacent property, at Ingenuity Prep-sponsored or related events on and off Ingenuity Prep grounds, on any vehicle used for Ingenuity Prep business, at any transit stop at which youth wait to be transported to Ingenuity Prep business, or through the use of any electronic devices owned by the school, leased by the school, or used for Ingenuity Prep business; and
2. At a location or function unrelated to Ingenuity Prep, through the use of any electronic devices, including those not owned or leased by the school, if the acts of bullying or cyberbullying create

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a hostile environment at the school for the victim or witnesses, infringe on their rights at the school, or materially and substantially disrupt the orderly operation of the school.

Retaliation against a youth, volunteer or staff member who reports bullying, provides information about an act of bullying, or witnesses an act of bullying is also prohibited.

Policy Development and Resource Mapping

Engaging the Community

Contact Information

This policy will be made available on Ingenuity Prep's website. The policy, and age appropriate versions thereof, will be distributed to youth and parents of youth in contact with Ingenuity Prep annually, and Ingenuity Prep will emphasize that the policy applies to participation in functions sponsored by Ingenuity Prep. Additionally, this policy will be included in all publications of school rules, regulations, and solicitations and agreements for contracts and grants.

Ingenuity Prep's School Culture Associate is responsible for coordinating Ingenuity Prep's bullying prevention efforts. All questions, comments and concerns about the bullying policy and Ingenuity Prep prevention efforts should be able to be directed to the School Culture Associate at ashaw@ingenuityprep.org.

Prevention Leadership

Responsibility for the implementation and execution of this policy is vested with the School Culture Associate and Head of School who shall have responsibility for:

1. Planning and organizing the prevention plan's professional development activities and coordinating these activities with the Director of Business & Operations;
2. Designing or choosing and implementing the programming and curricula the school uses to address bullying;
3. Receiving and recording incidents of bullying;
4. Responding to incidents of bullying and addressing the needs of victims and bullies;
5. Managing the data collaboration and collection process in cooperation with the District citywide prevention coordinator;
6. Coordinating community engagement efforts and;
7. Regularly reviewing and updating the policy and any procedures developed as part of it.

If the School Culture Associate chooses to delegate responsibility for any of these areas, it must be done in consultation with Ingenuity Prep's Head of School. All such decisions will be recorded to ensure that there are clear lines of responsibility for each prevention activity.

Resources Mapping

In order to obtain an accurate picture of the resources available as part of the prevention plan, Ingenuity Prep, in consultation with stakeholders, will conduct an annual resource mapping process. The process will identify:

1. What resources Ingenuity Prep has in place to support their primary, secondary and tertiary prevention strategies,

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2. What gaps exist in Ingenuity Prep’s bullying prevention services,
3. What steps must be taken, or services developed, to remedy these gaps,
4. What types of bullying risk factors each of Ingenuity Prep’s resources addresses,
5. What types of bully or victim behavior each available school resource will be most effective in addressing.

Policy Evaluation

Ingenuity Prep will annually review and update this policy with new prevention strategies developed after consultation with community stakeholders, continuing research on best practices in bullying prevention, and the school’s data collaboration with the citywide coordinator. Policy changes will be made to rectify gaps identified in the current prevention effort and to build on successful strategies. They will be further informed by whether or not Ingenuity Prep successfully met or is on track to meet performance goals described in its “prevention goals” section.

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Primary Prevention Strategies

Create Positive Agency Atmosphere

Ingenuity Prep will establish a culture of respect and safety. As part of this commitment, Ingenuity Prep will incorporate bullying prevention messages and efforts into all aspects of its operations that serve youth or that support youth serving operations.

Staff must be committed to creating a positive and respectful environment. Accordingly, Ingenuity Prep will consider questions about how prospective employees would support bullying prevention and the creation of a positive school environment at their job.

Community Education

Safe, positive environments are best supported by an active partnership between Ingenuity Prep and the community. This begins with parents and guardians. Accordingly, Ingenuity Prep will provide the parents and guardians of young people with presentations and workshops to educate them on:

1. How parents and guardians can use activities at home to build on the bullying prevention lessons taught at Ingenuity Prep;
2. The dynamics of bullying and its impact on youth;
3. Information about internet safety and cyberbullying;
4. Ingenuity Prep's legal and administrative responses to bullying;
5. Information on parent and guardian relevant sections of Ingenuity Prep's prevention policy.

Such information will also be made available by Ingenuity Prep to the community, and in particular to Ingenuity Prep youth and community advisory panels.

Where possible Ingenuity Prep will coordinate education efforts with other District agencies to effect citywide community education and awareness.

Code of Conduct

Ingenuity Prep expects youth to behave in a way that supports its objective to provide a safe and welcoming environment for other youth, staff, and community members. Youth who are part of the school community are expected to:

1. Treat all members of the school community with respect;
2. Respect the property of Ingenuity Prep, its staff, and other youth connected to Ingenuity Prep;
3. Respond appropriately to instructions from Ingenuity Prep staff.

Training and Professional Development

Training

Ingenuity Prep will provide to all personnel whose duties consistently bring them into contact with youth by design or incident, training on Ingenuity Prep's prevention curriculum, as well as the procedures for responding to and reporting an incident of bullying. Staff will also learn to engage with each other and youth reflectively to build a school-wide atmosphere of respect. These training efforts will be assisted, at Ingenuity Prep's request, by the citywide coordinator. This training will be provided

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regularly to Ingenuity Prep staff by the opening of the District academic school year immediately following the publication of this policy.

Staff assigned to Ingenuity Prep's Student and Family Support Team (SFST) will receive additional training on how to provide immediate support for victims and witnesses during or after an incident and may obtain District citywide coordinator support to provide this training. This additional training will be provided regularly to Ingenuity Prep staff by the opening of the District academic school year immediately following the publication of this policy.

Staff tasked with carrying out investigations into an incident of bullying as described in "Investigating Incidents of Bullying" will receive additional training on how to carry out these investigations.

The School Culture Associate will have the appropriate background checks needed to ensure they are allowed to work with children.

Ongoing Professional Development

Ingenuity Prep recognizes that in addition to training, staff members require ongoing professional development to build the tools and knowledge needed to prevent, identify, and respond to incidents of bullying. Therefore, Ingenuity Prep will ensure that staff has ongoing access to professional development opportunities that include information on:

1. The specific locations and dynamics of youth and bullying interactions at Ingenuity Prep;
2. Age and developmentally appropriate strategies for identifying, preventing, and responding constructively to incidents of bullying;
3. Specific populations that may be particularly at-risk in the school environment;
4. Internet safety and cyberbullying issues;
5. The components and delivery of the agency's prevention curriculum.

Curriculum

Ingenuity Prep will implement a comprehensive bullying prevention curriculum, the components of which will be integrated into all youth related Ingenuity Prep activities. This curriculum will teach youth¹:

1. Self-regulation (controlling impulses; focusing, sustaining and shifting attention; listening to and remembering information; empathy training);
2. Perspective-taking (appreciating similarities and differences; recognizing and identifying feelings of others; understanding that feelings can change and are complex);
3. Emotion management (recognizing and identifying one's own feelings; learning strategies for calming down strong emotions; managing stress/anxiety);
4. Problem-solving (learning a process for solving problems; goal setting);
5. Communication skills (being assertive; being respectful; negotiating and compromising);
6. Friendship skills (cooperation, including others, joining in with others).

¹ From "Jones, Lisa, Mia Doces, Susan Swearer, and Anne Collier. *Implementing Bullying Prevention Programs in Schools: A How-To Guide*. Born This Way Foundation & the Berkman Center for Internet & Society, 2012."



Development and integration of this curriculum into Ingenuity Prep's youth serving activities will be completed by the opening of the District academic school year after the adoption of this policy.

Data Collection

Data Collaboration

Prior to each academic year, Ingenuity Prep, in collaboration with citywide coordinator will determine what data will most productively assist Ingenuity Prep in supporting an effective Ingenuity Prep-wide bullying prevention policy. Based on this feedback, Ingenuity Prep and the citywide coordinator will determine a set of service and incident metrics to be collected by Ingenuity Prep. Efforts will be made to ensure consistent metrics and research products across years and to the extent possible, across agencies.

Incident Database

Ingenuity Prep will submit to the citywide coordinator a dataset of all incident and service measures designated in this policy. This data will not include any identifying information about the bully, victim, or witnesses. The School Culture Associate and Head of School will be responsible for ensuring the citywide coordinator has accurate information on incident and service measures. Given the sensitive nature of information contained in this database, only the School Culture Associate and Head of School will have access to individualizing information in the database.

Incident Measures

Ingenuity Prep will collect the following pieces of information about reported incidents of bullying:

1. Name(s) of the victim, bully, and any witnesses
 - a. Reliable contact information for the victim, bully and any witnesses
2. Relevant attributes about the victim, bully and any witnesses including:
 - a. Any prior incidents involving either the victim or bully
 - b. Connection of the victim, bully, and any witnesses to the incident (i.e. are they students, staff, volunteers, etc.)
3. The nature of the bullying incident
 - a. Where the incident took place
 - b. What time the incident took place
 - c. What type(s) of bullying it was (physical, verbal, cyber, relational, etc.?)
 - d. What factors drove the incident of bullying (social status, personal appearance, race, sexual orientation, etc.)
 - e. What adult supervision was in place
 - f. Context of the incident

Ingenuity Prep will only attempt to collect this information insofar as it does not jeopardize the safety of the victim and witness(es) and allows non-staff reports of bullying to be made anonymously.

Service and Climate Measures

The School Culture Associate will collect the following measures of prevention service provision:

1. Training Measures
 - a. Number of staff who have attended prevention training sessions;
 - b. Staff knowledge about bullying prevention dynamics and strategies.

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2. Curriculum Measures
 - a. Number of prevention curricula sessions provided to youth
 - b. Number of at-risk youth referred to treatment and services
 - i. Number of treatment sessions provided to at-risk youth
3. School Climate- surveys administered to youth and staff desired to measure perceptions of:
 - a. School climate
 - b. Safety at Ingenuity Prep
 - c. Youth self-reports of bullying

Reporting to the Citywide Coordinator

Ingenuity Prep will provide a report of bullying prevention and incident metrics to the citywide coordinator every six months. The school's report will include all service and incident measures included in this policy.

Ingenuity Prep will make a copy of the report prepared for the Mayor by the citywide coordinator available online at the agency's website and will include copies of the report in mailings to families of youth served by the agency as appropriate. Copies of the report will also be made available to the community at Ingenuity Prep's headquarters.

Ingenuity Prep will take every possible measure to ensure the privacy and confidentiality of all parties in an incident. To ensure confidentiality, reports provided to outside agencies will not include identifying information about the parties involved in an incident, and will report data only in the aggregate.

Prevention Goals

At the beginning of the District public school academic year, the School Culture Associate and Head of School will update goals for Ingenuity Prep's prevention efforts. Ingenuity Prep will set out clear, reasonable goals to be achieved in incident reduction, training and curriculum development and school climate improvement.

Secondary Prevention Strategies

Identifying At-Risk Groups

All staff at Ingenuity Prep will actively seek out youth who are at risk of being victims or bullies to proactively remedy incidents of bullying before they occur. In determining whether a youth is at risk of being a victim of aggression, staff will consider the following risk factors:

1. Individual factors
 - a. Cautious, sensitive, insecure personality
 - b. Difficulty asserting themselves among peers
 - c. Physical weakness, particularly in boys
2. Parental factors
 - a. Possible over-protective parents
3. Peer risk factors
 - a. Lack of close friends.

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Risk factors for being a bully in an incident include:

1. Individual factors
 - a. Impulsive, hot-headed, dominant personality lacking empathy
 - b. Difficulty conforming to rules and low frustration tolerance
 - c. Positive attitudes toward violence
 - d. Gradually decreasing interest in school or academic achievement
2. Parental factors
 - a. Lack of parental warmth and involvement
 - b. Overly-permissive or excessively harsh discipline/physical punishment by parents
 - c. Lack of parental supervision
3. Peer risk factors
 - a. Friends/peers with positive attitudes towards violence
 - b. Exposure to models of bullying

Referral to Secondary Service for At-Risk Youth

Ingenuity Prep staff who believe that a youth is at risk of being a victim or bully will send the youth to the School Culture Associate who will refer them to the appropriate services based on the agency's resource mapping effort. Resources will be given directly to the youth. If outside agencies are contacted, the youth's and/or parent or guardian's written consent must first be obtained.

Referral to service as part of a secondary prevention measure is not a disciplinary action and will never be noted on a youth's record as such. At the time of a referral School Culture Associate with assent from the youth will inform the youth's parents or guardian about referring youth to services, reasons they are referring youth, the type of service they are referring the youth.

Controlling At-Risk Areas

If a location on Ingenuity Prep premises is identified the school's data collection efforts as being particularly prone to hosting incidents of bullying, the School Culture Associate will take steps to improve the safety and security of that location for Ingenuity Prep youth. These steps will include:

1. Reducing youth traffic to these areas by altering schedules or activities;
2. Reducing the number of youth of different ages or activity groups in an at-risk area by altering schedules or activities;
3. Increasing supervision in these areas, and training supervising staff in the identification of bullying behaviors particularly common in that place.

Ingenuity Prep will take measures to address an at-risk location no more than one month after receiving information on the presence of such an area on Ingenuity Prep premises.

Secondary Services for At-Risk Youth

Secondary services provided to at-risk youth are not designed to punish and will not be reported on Ingenuity Prep records as such. Rather, the objective of secondary services is to support at-risk youth and address risk behaviors before they become serious safety or disciplinary issues. To this end,

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remedial measures will be tailored to the youth receiving them to build on youth strengths while addressing skills and behavior deficits.

When considering what remedial services should be offered to a youth, the School Culture Associate will take into account: life skill competencies and deficiencies, extracurricular and academic strengths and weaknesses, available peer and home support networks, and personal traits. Based on these attributes and information from resource mapping, the School Culture Associate will determine the appropriate remedial services. If Ingenuity Prep does not have access to services appropriate to a youth's needs, they will refer the youth to an outside agency who can address these needs rather than substituting other services that Ingenuity Prep can provide.

Resources will be given directly to youth. If outside agencies are contacted, the youth's and/or parent or guardian's written consent will first be obtained. In all cases of remedial action, Ingenuity Prep will take all possible steps to actively involve the youth's parents or guardians in the skill-building process, as long as the youth's written assent is obtained.

Examples of remedial services Ingenuity Prep will provide directly or refer a youth to include but are not limited to: peer support groups, alternative educational or institutional placement, youth treatment, therapy or counseling, closely monitored behavioral management plans, parent conferences or service learning experiences. Services will be provided to an at-risk youth no more than one month after such a determination is made by the School Culture Associate.

Tertiary Prevention Strategies

Reporting Incidents of Bullying or Retaliation

Ingenuity Prep expects all staff members and volunteers to report incidents of bullying or retaliation they witness or are made aware of. Staff members should immediately report all such incidents to the School Culture Associate who will create a written report of a bullying incident and include the incident in Ingenuity Prep reports of bullying incidents to the citywide coordinator.

Investigating Incidents of Bullying

Prior to the investigation of an incident, the School Culture Associate will take steps to ensure the safety of the alleged victim referenced in a reported bullying incident. These steps will be designed to restore a sense of safety to the victim and to protect them from further incidents if necessary. Examples of such steps taken include designating a staff member to serve as that alleged victim's "safe" person, altering the alleged bully/bullies' seating or schedule to reduce access to the alleged victim or creating a safety plan in consultation with the alleged victim. Once an investigation is concluded, further steps will be taken as needed to assure the continued safety of the victim from additional incidents of bullying or retaliation.

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Once a report of bullying has been received by an agency, the following groups will be notified as needed by the School Culture Associate, so long as, in the absence of legal imperative, the parent or guardian's written consent is obtained prior to notification.

Parents and guardians: Ingenuity Prep will notify the parents or guardians of victims, bullies, and if appropriate, witnesses to an incident of bullying behavior about the nature of the incident and the procedures and steps in place for responding to it. The School Culture Associate will determine if parents or guardians should be informed prior to or after the investigation of an incident.

Schools: Ingenuity Prep will notify the schools of all victims and bullies in an incident of bullying to ensure that youth are not victimized across agencies and that comprehensive service and protection can be provided to bullies and victims.

Law enforcement agencies: If Ingenuity Prep determines that the reported incident may involve criminal activity or the basis for criminal charges, information about the incident must be conveyed to the appropriate law enforcement authorities. As part of making this determination the School Culture Associate may wish to consult with either a law enforcement officer or legal counsel. Law enforcement shall only be contacted if all other available remedies have been exhausted.

Ingenuity Prep will notify these groups of incidents of bullying only to the extent allowed by law. Notification will be undertaken solely to ensure that services are provided to victims and bullies and to protect victims from further or sustained victimization. Ingenuity Prep will make every effort to protect the confidentiality of those who report bullying incidents.

The School Culture Associate is responsible for investigating reports of bullying and can be reached at ashaw@ingenuityprep.org. An investigation of an incident will be initiated no more than one day after the School Culture Associate or Head of School receives a report of bullying and will conclude no later than 30 days after the receipt of such a report. As part of the investigation the School Culture Associate or Head of School will interview any involved or relevant parties including alleged victims, bullies, witnesses, staff, parents or guardians.

The School Culture Associate and/or Head of School will provide confidentiality as far as possible to relevant parties as part of the investigation, and inform all relevant parties that retaliation for reporting acts of bullying is prohibited. Written records of the investigation process should be maintained and may be included in the prevention database to generate a more accurate picture of bullying behaviors at Ingenuity Prep. Where necessary, provisions will be made to include the advice of legal counsel.

In investigating an incident of bullying, the School Culture Associate and Head of School will seek to ensure that the reported incident is one of victimization, a sign of bullying, rather than of conflict. Thus when investigating a reported incident the School Culture Associate and Head of School will attempt to determine, through interviewing the victim, what mechanisms the victim had and has access to for

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halting the incident that occurred, and preventing future such instances. If the victim reports a few or no mechanisms for ending the incident or constructively dealing with future instances, that information will serve as compelling, though not conclusive evidence that the reported incident was an incident of bullying.

The School Culture Associate and/or Head of School are charged with making determinations as to whether a reported incident constitutes a case of bullying. These determinations will be made in consideration of the totality of the facts and the circumstances surrounding the incident. If the School Culture Associate determines that an incident of bullying has occurred, they should take the response steps enumerated in Ingenuity Prep's tertiary prevention plan to prevent the recurrence of an incident and restore the safety of a victim.

If the School Culture Associate determines that additional support is needed to conduct a thorough and equitable investigation they will contact the citywide prevention coordinator.

Sanctions and Remedies for Bullying

Sanctions

Ingenuity Prep recognizes that for sanctions to be an effective component of a bullying prevention plan, they must be applied consistently, fairly, and equitably. To this end, Ingenuity Prep shall ensure that staff to follow these guidelines as closely as possible, while allowing for flexibility to adapt sanctions to individual contexts. Furthermore, to ensure equitability in applying sanctions, measures will be applied on a graduated basis determined by the nature of the offense, the disciplinary history of the youth involved, and the age and developmental status of the youth involved. Responses to incidents of bullying may include, but are not limited to:

- Reprimand
- Deprivation of Ingenuity Prep privileges
- Bans on participating in optional Ingenuity Prep activities
- Deprivation of Ingenuity Prep services
- Ban or suspension from Ingenuity Prep facilities

Sanctions will be applied within one day of the determination that an incident of bullying has occurred, unless an appeal of the incident by the bully has been received in that time as described in the Appeals section of this policy. To ensure that single incidents of bullying do not become recurring problems, Ingenuity Prep will always refer victims and bullies involved in an incident to services in addition to imposing sanctions on bullies.

Ingenuity Prep shall communicate to youth in contact with Ingenuity Prep, the consequences that youth can expect for participating in bullying behavior.

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Referral to Services

Ingenuity Prep response to an active incident of bullying will always include the referral of both victim(s) and bully/bullies to remedial services. If an investigation determines that a youth was involved in an incident of bullying as a bully, victim, or witness the School Culture Associate will refer them to the appropriate services based on the school's resource mapping effort.

At the time of a referral the School Culture Associate will inform the youth's parents or guardian about referring the youth to services with the youth's assent if they have not already been informed as part of the investigation and determination process. The School Culture Associate will also explain the reasons they are referring a youth, the type of service they are referring the youth to and the reason they think that particular service(s) will meet the youth's needs. Resources will be given directly to the youth. If outside agencies are contacted, the youth's and/or parent or guardian's written consent must first be obtained. If parents or guardians do not consent to contact outside services than such services will only be applied to bullies in conjunction with any sanctions applied.

Services for Bullies, Victims and Witnesses

Remedial services to which youth are referred are not designed to be punitive and will never be noted on a youth's Ingenuity Prep records as such.

Remedial services provided to the bully are designed to correct the thinking patterns, behaviors, and skill deficiencies that led to the incident, turning a bullying incident into a teachable moment.

Remedial services provided to the victim and witnesses are designed to restore youths' sense of safety and to empower them to address bullying incidents in a constructive and non-violent manner.

Remedial services are designed to help youth build the skills to participate safely and constructively in Ingenuity Prep and will be tailored to youth based on: life skill competencies and deficiencies, extracurricular and academic strengths and weaknesses, available peer and home support networks, mental and behavioral health concerns, and personal traits. Based on these attributes and information from resource mapping indicating what Ingenuity Prep resources are best suited to address remedy these deficiencies, the School Culture Associate will determine the appropriate remedial services. Services will be provided to youth no later than one month after an incident of bullying is confirmed by the School Culture Associate and/or School Culture Associate.

Appeals

Parties dissatisfied by the outcome of a bullying investigation may appeal the determination of the School Culture Associate to the school Head of School. This appeal should be submitted no later than 30 days after the initial determination. Upon receipt of an appeal, the school Head of School must conduct a secondary investigation within 30 days of the receipt of an appeal. This 30 days may be extended by up to an additional 15 days if the school Head of School sets forth in writing the reasons why more time is needed to conduct an investigation. Additionally, upon the receipt of an appeal, the school Head of

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School must inform the party making the submission of their ability to seek additional redress under the DC Human Rights Act.

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