

ThrivePoint Academy of Oklahoma

Bullying Prevention, Reporting, Investigation, and Response Policy

Policy Number: [To be assigned]

Adoption Date: [Date]

Last Review Date: [Date]

Responsible Administrator: Regional Director/School Site Administrator

Legal Authority: 70 O.S. §§ 24-100.2 through 24-100.5; OAC 210:10-1-20

I. Purpose and Policy Statement

ThrivePoint Academy of Oklahoma is committed to maintaining a safe, respectful, inclusive, and supportive educational environment in which every student can learn without fear of bullying, intimidation, harassment, threatening behavior, retaliation, or cyberbullying.

Bullying is prohibited in all ThrivePoint educational environments, including virtual classrooms, school learning platforms, school communication systems, school-sponsored activities, school-sanctioned events, testing locations, administrative offices, and other locations or activities under the supervision or authority of the school.

The school will respond promptly and appropriately to all reported or suspected incidents of bullying. Responses may include immediate safety measures, investigation, parent or guardian notification, corrective or disciplinary action, educational intervention, counseling, restorative practices, referral to community services, and notification of law enforcement when required.

This policy will be implemented throughout the school year and coordinated with the school's student discipline, nondiscrimination, academic integrity, threat assessment, suicide prevention, special education, student safety, and acceptable technology use policies.

II. Definitions

A. Bullying

"Bullying" means any pattern of harassment, intimidation, threatening behavior, physical acts, verbal communication, or electronic communication directed toward a student or group of students that results in, or is reasonably perceived as being done with the intent to cause, negative educational or physical results for the targeted student or group and is communicated in such a way as to disrupt or interfere with the school's educational mission or the education of any student.

Bullying may include, but is not limited to:

1. Verbal abuse, insults, name-calling, ridicule, humiliation, or repeated teasing;
2. Threats of physical, emotional, social, or reputational harm;
3. Spreading harmful rumors or deliberately false information;
4. Intentionally excluding or isolating another student as a means of humiliation or control;
5. Encouraging others to threaten, embarrass, harass, or exclude a student;
6. Repeated unwanted electronic messages, images, recordings, posts, or communications;
7. Impersonating another person online to embarrass, threaten, or harm that person;
8. Posting or distributing private, embarrassing, altered, or harmful images, recordings, or information;
9. Interfering with a student's access to virtual instruction, school technology, school activities, or academic opportunities;
10. Deliberately disrupting a student's participation in a virtual classroom, online discussion, group project, or school-sponsored activity;
11. Conduct intended to cause fear, emotional distress, academic harm, or physical harm; or
12. Retaliating against a person for reporting bullying or participating in an investigation.

Bullying is generally distinguished from ordinary peer conflict by the repetitive nature, severity, purpose, effect, or power imbalance involved. A single serious act may constitute threatening behavior or another violation of school policy and may be addressed with the same urgency as bullying. Nothing in this policy prevents the school from responding to or disciplining serious misconduct merely because the conduct does not meet every element of the statutory definition of bullying.

B. Electronic Communication

"Electronic communication" means written, verbal, pictorial, audio, or video information communicated through an electronic device or platform, including a computer, tablet, telephone, cellular telephone, messaging system, email, social media platform, learning management system, video-conferencing platform, online discussion board, gaming platform, website, application, or other digital communication technology.

C. Cyberbullying

"Cyberbullying" means bullying that occurs through electronic communication.

For purposes of ThrivePoint's virtual program, cyberbullying may include conduct occurring through:

- School-issued devices;
- School email accounts;
- The school's learning management system;
- Virtual classrooms and video conferences;
- School-sponsored discussion boards or group chats;

- School-approved applications;
- School-sponsored social media pages;
- Electronic communications connected to a school activity or relationship; or
- Other electronic communications specifically directed toward a student or school employee that concern bullying at school and disrupt or interfere with the school's educational mission or a student's education.

The school may also address off-platform conduct when the conduct creates a material disruption to school operations, threatens student or employee safety, interferes with a student's ability to participate in school, or violates another applicable school policy or law.

D. At School

"At school" means on school property, in school vehicles, at school-sponsored activities, at school-sanctioned events, or within an educational environment operated or supervised by the school.

Because ThrivePoint is a virtual charter school, "at school" also includes:

1. School learning platforms and student information systems;
2. School-hosted virtual classrooms, meetings, tutoring sessions, conferences, testing sessions, and activities;
3. School email, messaging, and communication systems;
4. School-provided devices while being used for school purposes;
5. In-person testing, orientation, enrollment, tutoring, graduation, field trips, or other school activities; and
6. Other virtual or physical environments in which students are participating in school-authorized programming.

E. Threatening Behavior

"Threatening behavior" means a pattern of behavior or an isolated action, whether or not directed at a particular person, that a reasonable person would believe indicates the potential for future harm to students, school personnel, school operations, or school property.

Threatening behavior will be reported and addressed immediately under the school's safety and threat-assessment procedures, regardless of whether the conduct is ultimately determined to be bullying.

F. Retaliation

"Retaliation" means intimidation, harassment, exclusion, threats, punishment, or other adverse action against a person because the person:

1. Reported suspected bullying;
2. Assisted another person in making a report;

3. Participated in an investigation;
4. Provided information or evidence; or
5. Refused to participate in bullying.

Retaliation is prohibited and may result in corrective or disciplinary action.

G. Documented and Verified Bullying

“Documented and verified bullying” means conduct that has been investigated and determined, based on the available evidence, to meet the definition of bullying or to constitute a violation of this policy.

III. Bullying Prevention Officer

The Regional Director/School Site Administrator shall designate at least one employee to serve as the school’s **Bullying Prevention Officer**, or BPO.

The BPO will serve as the primary point of contact for bullying reports and will:

1. Receive, promptly review, and track bullying reports;
2. Maintain an accessible reporting process, including an anonymous reporting option;
3. Coordinate or conduct investigations;
4. Maintain records and protect confidentiality as required by law;
5. Publicize the school’s reporting procedures;
6. Educate students, families, staff, and the community about bullying prevention;
7. Monitor patterns, locations, methods, or repeated participants associated with bullying reports;
8. Recommend improvements to school climate, supervision, technology systems, and student supports;
9. Serve on the Safe School Committee;
10. Assist with prevention education and employee training;
11. Report documented and verified incidents in accordance with OSDE requirements; and
12. Perform other duties assigned by the Regional Director or Safe School Committee.

The name, email address, telephone number, and reporting information for the BPO will be published on the school’s website, in the Student and Family Handbook, and in the Employee Handbook.

IV. Reporting Bullying

A. Who May Report

A bullying report may be made by:

- A student;
- A parent or guardian;

- A school employee;
- A volunteer;
- A witness;
- A community member; or
- Any other person with relevant information.

A person does not need to determine whether the conduct legally constitutes bullying before making a report. Persons should report behavior that may threaten a student's safety, emotional well-being, educational access, or participation in school.

B. How to Report

Reports may be submitted through any of the following methods:

1. The school's Bullying Incident Report Form;
2. The school's anonymous online reporting form;
3. Email to the BPO or school administrator;
4. Telephone contact with the school;
5. Written communication;
6. Verbal communication to any school employee; or
7. Direct reporting to law enforcement when criminal activity or an immediate safety threat is suspected.

The school will make reporting forms and instructions available on its website, through the virtual learning platform, and from school administrators and counselors.

A report should include, when known:

- The names of the students or persons involved;
- The date and time of the incident;
- Where or through what platform the incident occurred;
- A description of what happened;
- The names of witnesses;
- Screenshots, messages, links, recordings, photographs, or other evidence;
- Whether the conduct has happened before;
- Whether the student currently feels unsafe; and
- Any requested safety or support measures.

A report will not be rejected solely because it is incomplete, is made verbally, or does not use the school's official form.

C. Anonymous Reports

Reports may be submitted anonymously. The school will investigate an anonymous report to the extent reasonably possible.

Formal disciplinary action will not be taken solely on the basis of an anonymous report. Disciplinary action must be supported by additional evidence obtained through the investigation.

D. Employee Reporting Requirement

Any school employee who has reliable information that would lead a reasonable person to suspect that a student is currently or has previously been the target of bullying must report the information immediately to the BPO, Regional Director, or designated school administrator.

An employee who receives a verbal report from a student must assist the student in documenting and submitting the report. The employee may not instruct the student merely to handle the matter independently.

Failure by an employee to report suspected bullying in accordance with this policy may result in corrective or disciplinary action.

E. Emergency Reports

A person should contact 911 or appropriate law enforcement immediately when conduct presents an imminent threat of physical harm, involves a weapon, includes a credible threat of violence, or may constitute criminal activity.

School personnel must also follow all applicable mandatory reporting, suicide prevention, threat-assessment, child abuse and neglect, and emergency-response procedures.

V. Immediate Safety Response

Upon receiving a report, the BPO or administrator will promptly determine whether immediate protective measures are necessary.

Protective measures may include:

1. Establishing a no-contact directive;
2. Separating involved students during virtual or in-person activities;
3. Adjusting group assignments, class sessions, communication permissions, or activity participation;
4. Increasing adult monitoring;
5. Preserving electronic evidence;
6. Restricting specific communication functions or accounts;
7. Providing alternative access to instruction when a temporary technology restriction is necessary;
8. Developing a student safety plan;
9. Contacting a parent or guardian;
10. Conducting a behavioral threat assessment;
11. Referring the student to a counselor or mental health professional; or
12. Contacting law enforcement, emergency services, or child welfare authorities.

Protective measures should be designed, when reasonably possible, to minimize disruption or additional burden for the targeted student. The targeted student should not be involuntarily removed from a course, activity, or educational opportunity merely for the convenience of addressing the alleged perpetrator's conduct.

VI. Parent and Guardian Notification

The parents or legal guardians of the alleged target and alleged perpetrator will ordinarily be notified within **24 hours** after the school receives a bullying report.

Notice may be delayed only when prohibited by law or when law enforcement, child welfare authorities, or emergency personnel advise that notification would compromise an investigation or create a significant safety risk. The reason for any delay must be documented, and notice must be provided as soon as legally and safely possible.

Parents or guardians will also receive timely notice when:

1. An investigation has been initiated;
2. Immediate safety measures affect their student;
3. Additional information or participation is requested;
4. The investigation has been completed;
5. The allegation has been verified or not verified; and
6. Follow-up services or actions involving their student are recommended.

If a student expresses suicidal thoughts or intentions, or encourages another student to attempt suicide, the school will immediately follow its suicide prevention and emergency-response procedures and notify the appropriate parent or guardian as required by law.

Because of student privacy requirements, the school may not disclose specific disciplinary action, educational records, disability information, or confidential information concerning another student.

VII. Investigation

A. Initiation

The BPO, Regional Director, School Site Administrator, or other designated administrator will initiate an investigation within **three school days** after receiving a report.

Nothing prevents the school from initiating the investigation sooner, particularly when immediate safety concerns exist.

B. Investigator

The investigation will be conducted by the school principal, site administrator, BPO, or another trained administrator designated by the Regional Director.

An investigator who has a conflict of interest or who is personally involved in the incident will not conduct the investigation.

C. Investigation Procedures

The investigator may:

1. Interview the reporting person;
2. Interview the alleged target;
3. Interview the alleged perpetrator;
4. Interview witnesses;
5. Contact parents or guardians;
6. Review screenshots, messages, emails, videos, recordings, photographs, online posts, documents, or platform records;
7. Review prior relevant reports or behavioral information;
8. Review attendance, academic, engagement, or participation information when relevant;
9. Request preservation of relevant electronic evidence;
10. Consult teachers, Success Coaches, counselors, special education personnel, technology personnel, or administrators;
11. Consult law enforcement or other agencies when appropriate; and
12. Take other reasonable steps necessary to determine what occurred.

The alleged target and alleged perpetrator should not be interviewed together. The school will take reasonable steps to prevent intimidation, confrontation, or retaliation during the investigative process.

At the request of a student or the student's parent or guardian, a parent, guardian, or attorney may be present during an interview of the student, consistent with school procedures and applicable law.

D. Completion Timeline

Investigations should ordinarily be completed within **10 school days** after initiation.

When an investigation cannot reasonably be completed within 10 school days because of witness availability, law-enforcement involvement, extensive electronic evidence, school closures, or other circumstances, the investigator will:

1. Document the reason for the extension;
2. Notify the parents or guardians of the affected students; and
3. Complete the investigation as promptly as reasonably possible.

E. Standard for Determination

The investigator will determine whether the available evidence shows that it is more likely than not that the reported conduct occurred and violated this policy.

A report may result in one of the following determinations:

- Documented and verified bullying;
- Documented threatening behavior;
- Other verified student misconduct;
- Insufficient evidence to verify the report; or
- Unfounded or knowingly false report.

A finding that there was insufficient evidence does not mean that the reporting person acted dishonestly.

F. Investigation Documentation

The written investigation record will include, at minimum:

1. The date the report was received;
2. The date the investigation began;
3. The name and title of the investigator;
4. The individuals involved;
5. The witnesses interviewed;
6. A summary of the allegation;
7. The evidence reviewed;
8. The investigative steps taken;
9. Relevant prior incidents or patterns, when legally appropriate;
10. An assessment of the severity of the incident;
11. An assessment of the potential for future violence or harm;
12. The determination and basis for the determination;
13. Immediate and continuing safety measures;
14. Corrective, remedial, supportive, or disciplinary actions;
15. Referrals or services offered;
16. Dates and methods of parent or guardian notification; and
17. Follow-up actions and monitoring.

VIII. Response to Verified Bullying

When bullying is documented and verified, the school will implement reasonably calculated measures to stop the conduct, protect affected students, prevent recurrence, address the effects of the conduct, and preserve access to education.

Responses will be determined individually based on:

- The nature and severity of the conduct;
- The age and developmental level of the students;
- The extent of actual or threatened harm;
- Whether the conduct was repeated;

- The existence of a power imbalance;
- The student's disciplinary history;
- The effect on the target and school community;
- The likelihood of recurrence or future violence;
- Whether protected-class harassment is involved;
- Whether the student has a disability or educational plan; and
- Other relevant circumstances.

Corrective and disciplinary responses may include:

1. Student and parent conferences;
2. Education concerning bullying and digital citizenship;
3. Written reflection or corrective instruction;
4. A behavior intervention plan or behavior contract;
5. A no-contact directive;
6. Restorative practices when voluntary, appropriate, and safe;
7. Counseling or social-emotional intervention;
8. Increased monitoring;
9. Changes to group assignments or communication privileges;
10. Temporary restrictions on school communication platforms;
11. Loss of privileges;
12. Removal from a particular nonacademic activity;
13. Referral to community-based services;
14. Referral to a delinquency prevention or diversion program administered by or associated with the Office of Juvenile Affairs;
15. In-school or out-of-school suspension when authorized;
16. Long-term suspension or expulsion in serious cases, consistent with due-process requirements;
17. Referral to law enforcement; or
18. Other action permitted under the Student Conduct and Discipline Policy.

Discipline will not be imposed solely because an allegation was made. The school will consider alternatives to strictly punitive measures when those alternatives can protect safety, repair harm, teach appropriate conduct, and prevent recurrence.

IX. Student Supports and Referrals

The school will provide or recommend appropriate supports for students affected by bullying, including targets, perpetrators, witnesses, and affected family members.

Supports may include:

- Counseling;
- Success Coach support;
- Academic intervention;

- Safety planning;
- Increased staff check-ins;
- Schedule or instructional adjustments;
- Social-emotional instruction;
- Mental health services;
- Substance-abuse services;
- Community-based programs;
- Delinquency prevention or diversion programs;
- Disability-related services or evaluations; and
- Other appropriate resources.

Following an investigation, the school may recommend available community mental health, substance-abuse, or counseling services.

When legally permitted and necessary for safety planning, the school may request information indicating an explicit threat to students or school personnel. Any request, receipt, or disclosure of such information must comply with FERPA, HIPAA, applicable Oklahoma confidentiality statutes, and other state and federal privacy laws.

X. Students With Disabilities

Students with disabilities are subject to this policy.

Any investigation, safety response, change of placement, suspension, expulsion, behavioral intervention, or other disciplinary action involving a student with a disability will be implemented in accordance with:

- The Individuals with Disabilities Education Act;
- Section 504 of the Rehabilitation Act;
- The Americans with Disabilities Act;
- The student's Individualized Education Program or Section 504 Plan;
- Applicable manifestation determination requirements; and
- Other state and federal requirements.

A student's disability does not excuse bullying, but the school will consider disability-related needs and provide required services, supports, behavioral assessments, or interventions.

XI. Discrimination and Harassment

Bullying may also constitute unlawful discrimination or harassment when it is based on, motivated by, or connected to a person's protected status.

Reports involving race, color, national origin, sex, disability, religion, age, or another legally protected characteristic will also be referred to the appropriate Title VI, Title IX, Section 504, ADA, or nondiscrimination coordinator for review under applicable civil rights procedures.

The school may conduct a coordinated investigation when conduct is covered by more than one policy. Nothing in this policy limits a student's right to file a complaint under the school's nondiscrimination or Title IX grievance procedures.

XII. Retaliation and False Reports

Retaliation against any person who reports bullying, assists another person in making a report, provides evidence, or participates in an investigation is prohibited.

A person who experiences retaliation should immediately report it to the BPO or Regional Director. Retaliation will be investigated as a separate policy violation.

A student who knowingly makes a false accusation as an act of retaliation, reprisal, harassment, or bullying may be subject to corrective or disciplinary action.

A report will not be considered knowingly false merely because:

- The allegation could not be verified;
- The evidence was inconclusive;
- Witness accounts differed; or
- The reporting person misunderstood some facts.

When an accusation is determined to have been knowingly false, unsupported accusations will be removed or corrected in the falsely accused student's record as appropriate.

XIII. Law-Enforcement and Agency Referrals

The school will report documented and verified conduct to law enforcement when the conduct:

1. May constitute criminal activity;
2. Presents or reasonably may present a danger to students, employees, school operations, or property;
3. Involves a credible threat of violence;
4. Involves weapons, stalking, extortion, assault, sexual misconduct, exploitation, or unlawful electronic communications; or
5. Must otherwise be reported under state or federal law.

School disciplinary and safety procedures may proceed independently of a criminal investigation unless law enforcement requests a temporary delay to protect the integrity of its investigation.

Nothing in this policy replaces an employee's duty to report suspected child abuse or neglect, threats of violence, suicidal behavior, or other matters requiring immediate reporting.

XIV. Prevention and Education

ThrivePoint will implement age-appropriate, research-based bullying prevention education consistent with OSDE guidance.

Prevention efforts may include:

- Digital citizenship and online safety education;
- Social-emotional learning;
- Student orientation;
- Classroom lessons;
- Virtual assemblies;
- Parent and family education;
- School climate activities;
- Bystander intervention education;
- Communication and conflict-resolution instruction;
- Suicide prevention and mental health awareness;
- Staff-student relationship building; and
- Multi-tiered student supports.

Students will receive education concerning:

1. The definition and effects of bullying;
2. Expected standards of behavior;
3. Appropriate use of electronic communications;
4. How to report bullying;
5. How to preserve electronic evidence;
6. How to respond safely as a witness;
7. Available student supports;
8. The prohibition against retaliation; and
9. Consequences for bullying and knowingly false reports.

XV. Employee Training

All administrators and employees will receive training in preventing, identifying, responding to, documenting, and reporting bullying.

The school will provide bullying prevention training annually or more frequently when appropriate. Training will include:

- The requirements of this policy;
- Recognizing bullying and threatening behavior;
- Responding to virtual and electronic misconduct;
- Immediate employee reporting responsibilities;
- Preserving electronic evidence;
- Protecting students from retaliation;
- Trauma-informed responses;

- Civil rights considerations;
- Student suicide and mental health concerns;
- Threat-assessment procedures; and
- Supports for targets, perpetrators, and witnesses.

At minimum, all employees will complete training during their first year of employment and thereafter as required by Oklahoma law and OSDE regulations.

XVI. Safe School Committee

ThrivePoint will establish a Safe School Committee each year consisting of at least seven members.

The committee will include:

- Teachers;
- Parents or guardians of enrolled students;
- Students; and
- A school official who participates in bullying investigations.

The committee may also include administrators, other employees, volunteers, community representatives, mental health professionals, and law-enforcement representatives.

The Safe School Committee will:

1. Review the school's bullying prevention policy annually;
2. Review bullying incident trends and school climate information;
3. Recommend prevention and intervention strategies;
4. Identify professional-development needs;
5. Recommend methods to improve student and community involvement;
6. Review safety and emotional well-being concerns;
7. Review OSDE-recommended research-based programs;
8. Recommend improvements to virtual safety and communication systems; and
9. Make recommendations to the Regional Director and Board of Education.

Oklahoma law requires each public school site to establish a Safe School Committee annually with at least seven members, including teachers, parents, students, and an official involved in bullying investigations.

XVII. Confidentiality and Records

Bullying reports and investigation records will be maintained in accordance with applicable record-retention requirements.

Information will be shared only with persons who have a legitimate educational, safety, investigative, or legal need to know.

The school cannot guarantee complete confidentiality because information may need to be disclosed to:

- Conduct a fair investigation;
- Protect a student or employee;
- Notify parents or guardians;
- Provide educational services;
- Comply with due process;
- Respond to a legal request; or
- Comply with mandatory reporting requirements.

The school will nevertheless take reasonable steps to protect the privacy of reporting persons, witnesses, targets, and accused students.

XVIII. Tracking and State Reporting

The BPO will maintain a system for tracking all reported incidents in a manner that allows the school to identify:

- Repeated conduct;
- Repeated participants;
- Patterns involving particular platforms or activities;
- Escalating behavior;
- Recurring safety concerns;
- Potential future violence; and
- Needed prevention or intervention measures.

The administration will report documented and verified bullying incidents and submit required policies, certifications, and discipline information to OSDE within applicable reporting deadlines.

The administration will submit or certify the school's discipline and bullying policy to OSDE by December 10 of each year, or by any successor deadline established by OSDE, and will complete other required annual incident reporting.

XIX. Notice and Publication

The school will provide annual written notice of this policy to:

- Students;
- Parents and guardians;
- Employees;
- Volunteers; and
- Other appropriate members of the school community.

The policy will:

1. Be included in the Student and Family Handbook;
2. Be included in the Employee Handbook;
3. Be posted on the school website;
4. Be posted within the virtual learning platform or student portal;
5. Be posted at the school's administrative office and other physical school locations;
6. Be accompanied by reporting instructions and forms; and
7. Be provided in age-appropriate and accessible formats.

A copy will be provided upon request.

XX. Administrative Review

A student or parent who believes the school did not follow this policy may submit a written request for administrative review to the Regional Director within 10 school days after receiving notice that the investigation has been completed.

The review will determine whether:

1. Required procedures were followed;
2. Relevant evidence was considered;
3. The determination was reasonably supported by the evidence;
4. Appropriate safety and corrective measures were implemented; and
5. Additional investigation or action is necessary.

Student disciplinary appeals will be handled under the school's Student Conduct and Discipline Policy.

A person requesting review is not entitled to receive confidential educational or disciplinary information concerning another student.

XXI. Annual Review

The Regional Director, BPO, Safe School Committee, and Board of Education will review this policy at least annually and revise it as necessary to reflect:

- Changes in Oklahoma law;
- Changes in OSDE rules or guidance;
- School incident data;
- Changes in technology or virtual instruction;
- Recommendations from the Safe School Committee;
- Feedback from students, employees, and families; and
- Identified safety or implementation needs.