Exhibit 10

Policy 8400 - School Safety Information (Revised)



Book Policy Manual

Section Policies for Board 36-2

Title Copy of SCHOOL SAFETY INFORMATION

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Status Work Session

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8400 - SCHOOL SAFETY INFORMATION

The School Board is committed to maintaining a safe environment in all of the School Corporation's schools.

The Board believes that school crime and violence are multifaceted problems that need to be addressed in a manner that utilizes the best resources and coordinated efforts of Corporation personnel, law enforcement agencies, and families. The Board further believes that school administrators and local law enforcement officials must work together to provide for the safety and welfare of students while they are at school or a school-sponsored activity or while en route to or from school, or a school-sponsored activity. The Board also believes that the first step in addressing school crime and violence is to assess the extent and nature of the problem(s) or threat, and then plan and implement strategies that promote school safety and minimize the likelihood of school crime and violence.

In furtherance of its commitment to a safe school environment, the Board has prohibited weapons on school property and at school-sponsored events, except in very limited circumstances. See Board Policy 3217, Policy 4217, Policy 5772, and Policy 7217. This prohibition is reasonably related to legitimate educational concerns, including the ability to provide a safe and secure learning and social environment for the Corporation's students and controlling and minimizing disruptions to the educational process. The presence of dangerous weapons on school property or at school-sponsored events, except under very controlled circumstances, creates a potentially dangerous situation for students, staff, and visitors, and may trigger precautionary safety responses that disrupt the educational process and learning environment for students.

Federal law establishes a "Student Safety Zone" that extends 1,000 feet from the boundary of any school property in relation to weapons and drugs. Individuals are prohibited from possessing or using weapons or drugs at any time on Corporation property, within the Student Safety Zone, or at any school-related event.

In accordance with State and Federal law, each school within the Corporation shall establish a Safe School Committee, the composition of which shall be in accordance with the Superintendent's guidelines.

The Corporation shall establish a Safe School Committee at each school building. (I.C. 10-21-1-14)

[OPTIONAL: The Board may choose the following option]

[X] The Corporation also shall establish a **Safe School Committee** for the entire Corporation, the composition of which shall be in accordance with the Superintendent's guidelines listed below.

[END OPTION]

The Safe School Committee may include at least one (1) member who is a member of the support staff of the school or Corporation career and technical education school.

The Safe School Committee shall be responsible for developing a plan that addresses the following issues:

- A. Unsafe conditions, crime prevention, school violence, bullying, criminal organization activity, child abuse and child sexual abuse, and other issues that prevent the maintenance of safe schools.
 - Accordingly, the school safety plan developed by the school safety specialist with the assistance of the school resource officer shall be a part of the plan developed by the Safe School Committee.
- B. Professional development needs for faculty and staff to implement methods that decrease problems identified above.
- C. Methods to encourage involvement by the community and students, development of relationships between students and school faculty and staff, and use of problem solving teams.
- D. Provide a copy of the floor plans for each building that clearly indicates each exit, the interior rooms and hallways, and the location of any hazardous materials located in the building to the local law enforcement agency and the fire departments that have jurisdiction over the school.

NOTE: The Corporation shall not disclose any record or part of any record if the its disclosure of which would have a reasonable likelihood of threatening public safety by compromising the Corporation's security.

In developing the plan, the Safe School Committee shall seek input from representatives of the following:

- A. the State Department of Education;
- B. the Corporation's school safety specialist;
- C. School Resource Officer(s);
- D. local law enforcement agency;
- E. the local Fire Marshal(s) or his/her designee(s);
- F. local emergency medical services;
- G. a member of the Board;
- H. building administrators;
- I. the local emergency management service agency;
- J. Director of School Safety.

The Superintendent shall recommend the approval and adoption of the Corporation's plan. **[OPTIONAL:]**

[] The Superintendent shall recommend the approval and adoption of each school's plan.

[DRAFTING NOTE: The Board may decide whether to select the following option if the Board elected above to have a Safe School Committee for the entire Corporation. If the Board did not elect to have a Safe School Committee for the entire Corporation, it should not select the following option.]

[X] The Superintendent shall recommend the approval and adoption of the Corporation's plan.

[END OF OPTION]

Safe School Committee's Duty To Implement the Safe and Drug-Free Schools and Communities Act

The Safe School Committee is responsible for implementing the Safe and Drug-Free Schools and Communities Act. To ensure that the Corporation remains compliant with Federal law, the Safe School Committee shall:

- A. develop a drug-free school plan that:
 - 1. requires each school to collect and report drug-related activities in the school, including suspensions, expulsions, exclusions, police actions, or any other type of drug-related behavior; and
 - 2. addresses ways to eliminate illegal drugs and drug-related behavior in schools;

- B. oversee the implementation of the school plan;
- C. oversee the implementation of the curriculum under I.C. 20-30-5-11 concerning the effects that alcoholic beverages, tobacco, prescription drugs, and controlled substances have on the human body and society at large.

To apply annually for matching grant funds from the Indiana secured school fund, the Corporation shall certify to the Department of Homeland Security that it has:

- A. conducted a threat assessment for each school building it uses; and
- B. entered into a memorandum of understanding (MOU) in place with a community mental health center established under State law or a provider certified or licensed by the State to provide mental or behavioral health services to students.

School Safety Specialist

The Corporation shall designate an individual to serve as the school safety specialist for the Corporation. The school safety specialist shall be chosen by the Superintendent with the approval of the Board. The school safety specialist shall perform the following duties:

- A. Serve on the county school safety commission, if a county school safety commission is established under I.C. 5-2-10.1-10. with jurisdiction over the Corporation established under I.C. 10-21-1-12.
- B. Participate each year in a number of days of school safety training that the council determines. Indiana Department of Education determines necessary.
- C. With the assistance of the county school safety commission with jurisdiction over the Corporation established under I.C. 10-21-1-12, if a county school safety commission is established under I. 5-2-10.1-10, develop, implement, and improve a school safety plan for each school in the Corporation.
- D. Coordinate the school safety plans of each school in the Corporation as required by State law and under rules adopted by the Indiana state board of education; and State Board of Education
- E. Act as a resource for the Corporation's safe school committees and other individuals in the Corporation on issues related to school discipline, safety, and security; and
- F. Serve as a liaison for the Corporation regarding school safety matters with the secured school safety board, the Department of Homeland Security, the Department of Education, the Indiana Criminal Justice Institute, and other state agencies, as applicable.

School Safety Plan

A school safety plan must be developed by the school safety specialist must: and the school's safe school committee, including a school resource officer if one is employed by the Corporation, in consultation with the law enforcement agency and fire department that have jurisdiction over the school which:

- A. includes the requirements set forth in I.C. 20-26-18.2-2(b) 10-21-1-10(c), namely:
 - Protect against outside threats to the physical safety of students, protects against outside and internal threats
 to the physical safety of students, faculty, staff, and the public, including unsafe conditions, crime prevention,
 school violence, bullying and cyberbullying, criminal organization activity, child abuse and child sexual abuse,
 mental health and behavioral health, suicide awareness and prevention, violence prevention and training,
 situational awareness, and other issues that prevent the maintenance of a safe school;
 - Prevent unauthorized access to school property, prevents unauthorized access to school property and interior
 areas or rooms, including the management of authorized visitors on school property, before during, and after
 regulator school hours;
 - 3. Secure schools against violence and natural disasters, and secures schools against natural and manmade disasters, including all emergency preparedness drill requirements set forth in I.C. 20-34-3-20;
 - establishes an armed intruder drill protocol that: a) provides accommodations for students who have mobility restrictions, sensory needs, or auditory or visual limitations; b) emphasizes the practical nature of the drill; c) provides access to mental health services on school grounds following the conclusion of a drill; d) provides

advance notice of a drill to parents or legal guardians of students who attend the school; and e) provides alternative exercises for students who are unable to participate in a drill;

- 5. includes a site vulnerability assessment for each school building;
- 6. not later than July 1, 2025, includes the establishment of a multi-disciplinary threat assessment team;
- includes measures to expedite notification of first responders and access to school property for first responders;
- Identify the location of includes bleeding control kits;, including the location of bleeding control kits and the
 presentation and use of bleeding control kits in all drills and emergencies, as required by I.C.
 20-34-3-24(c); and
- 9. includes any additional requirements required by the Indiana State Board of Education.
- B. must be provided to a member of the secured school safety board, as established by I.C. 10-21-1-3, if a member requests the plan; and
- C. must be available for inspection by the Department of Education's Division of School Building Physical Security and Safety, as established by I.C. 20-19-3-14;
- D. must be provided to the law enforcement agency and the fire department that have jurisdiction over the Corporation;
- E. must include an attestation that: a) a copy of the floor plans for each building located on the school's property were provided to the law enforcement agency and the fire department that have jurisdiction over the Corporation that clearly indicates each entrance and exit, the interior rooms and hallways, and the location of hazardous materials located in the building; or b) the Corporation has conducted critical incidence digital mapping for each school building within the Corporation, including providing the critical incidence digital mapping information to the law enforcement agency and fire department that have jurisdiction over the mapped school buildings and the statewide 911 system described in I.C. 36-8-16.7-22 through the public safety answer point, or "PSAP", described in I.C. 36-8-16.7-20 that has jurisdiction over the mapped school buildings; and
- F. must be filed with the county safe school commission under I.C. 5-2-10.1-10 if the county has established a county safe school commission. established under I.C. 10-21-1-12 that has jurisdiction over the Corporation.

School Resource Officers

"School resource officer" means a law enforcement officer who:

- A. has completed the training described below;
- B. is assigned to one (1) or more school corporations or charter schools during school hours to:
 - 1. assist the school safety specialist and safe school committee with the development and implementation of the school safety plan; and
 - 2. carry out any additional responsibilities assigned to the school resource officer under the employment engagement, contract, or memorandum of understanding and to provide law enforcement services to:
 - a. protect against outside threats to the physical safety of students;
 - b. prevent unauthorized access to school property; and
 - c. secure schools against violence and natural disasters; and

C. is:

- 1. employed by a law enforcement agency;
- 2. appointed as a police reserve officer (as described in I.C. 36-8-3-20) or as a special deputy (as described in I.C. 36-8-10-10.6) if the police reserve officer or special deputy:
 - a. is subject to the direction of the sheriff or appointing law enforcement agency;

- b. is required to obey the rules and orders of the sheriff's department or appointing law enforcement agency;
- c. is required to complete all training required of regular full-time law enforcement officers employed by the sheriff's department or appointed appointing law enforcement agency; and
- d. may be removed by the sheriff or appointed appointing law enforcement agency at any time, with or without cause; or
- 3. a school corporation police officer appointed under I.C. 20-26-16-3

The term does not include a law enforcement officer who is assigned to a school to provide security outside a school building for protection from outside threats, traffic duty, or other duties not consistent with the duties of a school resource officer.

Before being appointed as a school resource officer, an individual must have successfully completed the minimum training requirements established for law enforcement officers under I.C. 5-2-1-9.

The law enforcement officer appointed as a school resource officer must receive at least forty (40) hours of school resource officer training through:

- A. the Indiana law enforcement training board Law Enforcement Training Board established by I.C. 5-2-1-3;
- B. the National Association of School Resource Officers; or
- C. another school resource officer training program approved by the Indiana law enforcement training boardLaw Enforcement Training Board.

The school resource officer training must be completed within 180 days from the date the individual is initially assigned the duties of a school resource officer. However, if the current ADM of the Corporation is less than 1,000 students, the individual shall complete the school resource officer training within 365 days of the date the individual is initially assigned the duties of a school resource officer.

The training described above must include instruction regarding skills, tactics, and strategies necessary to address the special nature of:

- A. school campuses; and
- B. school building security needs and characteristics.

A school resource officer may be employed:

- A. through a contract between a local law enforcement agency and (1) the Corporation or (2) the Corporation and other school corporations or charter schools;
- B. by the Corporation or the Corporation and other school corporations or charter schools;
- C. by a local law enforcement agency that assigns the school resource officer to (1) the Corporation or (2) the Corporation and other school corporations or charter schools through a memorandum of understanding between the local law enforcement agency and the Corporation or the Corporation and other school corporations or the charter school or charter schools; or
- D. through a contract between an Indiana business that employs persons who meet the qualifications of a school resource officer and (1) the Corporation or (2) the Corporation and other school corporations or charter schools.

After June 30, 2023, iIf the Corporation enters into a contract for a school resource officer, the Corporation must enter into a memorandum of understanding with the law enforcement agency that employs or appointed the law enforcement officer who will perform the duties of a school resource officer unless the Corporation only has full-time school resource officers who are either employees of the Corporation's school police department or are employees of the Corporation who have successfully completed the law enforcement basic training requirements described in I.C. 5-2-1-9(d).

The memorandum of understanding described above must state the nature and scope of a school resource officer's duties and responsibilities. A school resource officer's duties and responsibilities include the duty to assist the Corporation's school safety specialist and Safe School Committee with the development and implementation of a school safety plans. that does

the following:

- A. Protects against outside threats to the physical safety of students.
- B. Prevents unauthorized access to school property.
- C. Secures schools against violence and natural disasters.
- D. On or before July 1, 2020, identifies the location of bleeding control kits (as defined in I.C. 20-34-3-24(a)).

A school resource officer shall consult with local law enforcement officials and first responders when assisting the Corporation's school safety specialist and safe school committee in the development of the school safety plan.

A school resource officer shall participate in the development of programs designed to identify, assess, and provide assistance to troubled youth who are at high risk of experiencing a mental health crisis or becoming juvenile offenders.

A school resource officer shall not be reassigned to other duties by the Corporation.

A school resource officer may:

- A. make an arrest;
- B. conduct a search or a seizure of a person or property using the reasonable suspicion standard;
- C. carry a firearm on or off school property; and
- D. exercise other police powers with respect to the enforcement of Indiana laws.

A school resource officer has jurisdiction in every county where the Corporation operates a school or where the Corporation's students reside. This does not restrict the jurisdiction that a school resource officer may possess due to the officer's employment by a law enforcement agency.

The Corporation shall report all instances of:

- A. seclusion (as defined in I.C. 20-20-40-9);
- B. chemical restraint (as defined in I.C. 20-20-40-2);
- C. mechanical restraint (as defined in I.C. 20-20-40-4); and
- D. physical restraint (as defined in I.C. 20-20-40-5);

involving a school resource officer in accordance with the restraint and seclusion plan adopted by the Corporation under I.C. 20-20-40-14.

Security Police Training

In the case of a regular or special police officer who is assigned as a security police officer for the Corporation, the Board shall require that the police officer receives training and education, approved by the State Board of Education, that will enable the police officer to appropriately deal with individuals with Autism and Asperger's Syndrome.

Mental or Behavioral Health Services

The Corporation shall enter into a memorandum of understanding (MOU) with a community mental health center established under State law or a provider certified or licensed by the State to provide appropriate and necessary mental or behavioral health services to students.

The Corporation may-shall not refer a student to a mental health care provider or community mental health center for services unless the Corporation has received the written consent of the student's parent or guardian. If a referral is made, the Corporation may note the referral in the student's cumulative record but shall not include any possible diagnosis or information concerning the student's mental health other than any medication that the student takes for his/hertheir mental health. A student's record that contains medical information shall be kept confidential. A school counselor or other Corporation employee may-shall not diagnose a student as having a mental health condition unless his/hertheir scope of practice includes diagnosing a mental health condition.

Prior to providing any referrals under a MOU, the Corporation must shall:

- A. Develop a process for a teacher or Corporation employee to notify a school official to contact a student's parent if the student demonstrates a repeated pattern of aberrant or abnormal behavior. The parental notification process must shall include a conference with the school, student, and the student's parent;
- B. Require that the aforementioned conference address the student's potential need for and benefit from:
 - 1. mental or behavioral health services; or
 - 2. mental or behavioral health services provided by the community mental health center or appropriate provider that is contracted and paid for by the Corporation;
- C. Establish a procedure for a parent who chooses to seek services for the student to follow that includes granting written parental consent for the student to receive mental or behavioral health services by a community mental health center or appropriate provider; and
- D. Protect the confidentiality of any medical records that result from a student's participation in any treatment described in subpart B above. and adopt a policy that prohibits the Corporation from:
 - sharing any reports or notes resulting from the provision of mental or behavioral health services described in subpart B.1 above with other school officials; and
 - maintaining any reports, notes, diagnosis, or appointments that result from a student's participation in any treatment described in B.1 or B.2 above in the student's permanent educational file. (See Policy 8330 – Student Records.)

The Corporation is prohibited from:

- A. sharing any reports or notes resulting from the provision of mental or behavioral health services described in subpart B.1 above with other school officials; and
- B. maintaining any reports, notes, diagnosis, or appointments that result from a student's participation in any treatment described in B.1 or B.2 above in the student's permanent educational file. (See Policy 8330 Student Records).

Threat Assessment

The primary purpose of a threat assessment is to minimize the risk of targeted violence at school. This policy is designed to be consistent with the process for identifying, assessing, and managing students who may pose a threat as set forth in the joint U.S. Secret Service and Department of Homeland Security publication, Enhancing School Safety Using a Threat Assessment Model: An Operational Guide for Preventing Targeted School Violence. The goal of the threat assessment process is to take appropriate preventive or corrective measures to maintain a safe school environment, protect and support potential victims, and provide assistance, as appropriate, to the student being assessed.

The threat assessment process is centered upon an analysis of the facts and evidence of behavior in a given situation. The appraisal of risk in a threat assessment focuses on actions, communications, and specific circumstances that might suggest that an individual intends to cause physical harm and is engaged in planning or preparing for that event.

The Board authorizes the Superintendent to create building-level, trained threat assessment teams. Each Team shall be headed by the Principal and include a school safety officer, school counselor, school psychologist, instructional personnel, and, where appropriate, the School Resource Officer. At the discretion of the Superintendent, a threat assessment team may serve more than one (1) school when logistics and staff assignments make it feasible.

The Team will meet on a regular basis and when the Principal learns a student has made a threat of violence or engages in concerning communications or behaviors that suggest the likelihood of a threatening situation.

The Team is empowered to gather information, evaluate facts, and make a determination as to whether a given student poses a threat of violence to a target. If an inquiry indicates that there is a risk of violence in a specific situation, the Team may collaborate with others to develop and implement a written plan to manage or reduce the threat posed by the student in that situation.

The Board authorizes the Superintendent to create guidelines for the purpose of:

A. identifying team participants by position and role;

- B. requiring team participants to undergo appropriate training;
- C. defining the nature and extent of behavior or communication that would trigger a threat assessment and/or action pursuant to a threat assessment;
- D. defining what types of information may be gathered during the assessment;
- E. stating when and how parents/guardians of the student making the threat shall be notified and involved;
- F. designating the individuals (by position) who would be responsible for gathering and investigating information;
- G. identifying the steps and procedures to be followed from initiation to conclusion of the threat assessment inquiry or investigation.

Board employees, volunteers, and other school community members, including students and parents, shall immediately report to the Superintendent or Principal any expression of intent to harm another person or other statements or behaviors that suggest a student may intend to commit an act of violence.

Nothing in this policy overrides or replaces an individual's responsibility to contact 911 in an emergency.

Regardless of threat assessment activities or protocols, disciplinary action and referral to law enforcement shall occur as required by State law and Board policy.

Threat assessment team members shall maintain student confidentiality at all times as required by Board Policy 8330 – Student Records, and State and Federal law.

Persistently Dangerous Schools

The Board recognizes that State and Federal law requires that the Corporation report annually incidents that meet the statutory definition of violent criminal offenses that occur in a school, on school grounds, on a school conveyance, or at a school-sponsored activity. It is further understood that the State Department of Education will then use this data to determine whether or not a school is considered "persistently dangerous" as defined by State policy.

Pursuant to the Board's stated intent to provide a safe school environment, the Corporation's school administrators are expected to respond appropriately to any and all violations of the Student Code of Conduct, especially those of a serious, violent nature. In any year where the number of reportable incidents of violent criminal offenses in any school exceeds the threshold number established in State policy, the Superintendent shall refer this to the Safe School Committee for the Corporation so that a plan of corrective action can be developed and implemented in an effort to reduce the number of these incidents in the subsequent year.

When developed, the Superintendent shall make a report to the Board about this plan of corrective action and recommend approval and adoption of it.

In the unexpected event that the number of reportable incidents in three (3) consecutive school years exceeds the statutory threshold and the school is identified as persistently dangerous, students attending the school shall have the choice option as provided in Policy 5113.02 - School Transfer Options and AG 5113.02 - School Transfer Options.

In addition, the Superintendent shall meet with the Safe School Committee for the Corporation to discuss the school's designation as a persistently dangerous school, and develop a plan of corrective action that can be implemented in an effort to reduce the number of these incidents in the subsequent year.

Victims of Violent Crime

The Board further recognizes that, despite the diligent efforts of school administrators and staff to provide a safe school environment, an individual student may be a victim of a violent crime in a school, on school grounds, on a school conveyance, or at a school-sponsored activity. In accordance with Federal and State law the parents of the eligible student shall have the choice options provided by Policy 5113.02 - School Transfer Options and AG 5113.02 - School Transfer Options.

Bleeding Control Kits

A 'bleeding control kit' means a first aid response kit that contains at least the following:

A. One (1) tourniquet endorsed by the Committee on Tactical Combat Casualty Care.

- B. A compression bandage.
- C. A bleeding control bandage.
- D. Protective gloves and a permanent marker.
- E. Scissors.
- F. Instructional documents developed by the Stop the Bleed national awareness campaign of the United States Department of Homeland Security or the American College of Surgeons Committee on Trauma, or both.
- G. Other medical materials and equipment similar to those described in subdivisions (A) through (C), and any additional items that:
 - 1. are approved by local law enforcement or first responders;
 - 2. can adequately treat a traumatic injury; and
 - 3. can be stored in a readily available kit.

Each school year subject to either:

- A. an appropriation by the general assembly; or
- B. the Corporation receiving sufficient bleeding control kits for each school in the Corporation from:
 - 1. donations from individuals or entities; or
 - 2. gifts necessary to purchase the bleeding control kits.

The Corporation shall develop and implement a Stop the Bleed program that meets the requirements set forth in I.C. 20-34-3-24(c), namely:

- A. requires bleeding control kits be assigned to designated rooms in easily accessible locations to be determined by local first responders or the school safety specialist;
- B. includes bleeding control kits in the emergency plans of the school corporation or charter school, including the presentation and use of the bleeding control kits in all drills and emergencies;
- C. provides that all Corporation schools have a minimum of five (5) individuals in each school building who obtain appropriate training in the use of the bleeding control kit including:
 - 1. the proper application of pressure to stop bleeding;
 - 2. the application of dressings or bandages;
 - 3. additional pressure techniques to control bleeding; and
 - 4. the correct application of tourniquets;
- D. requires bleeding control kits in school inventories to be inspected annually to ensure that the materials, supplies, and equipment contained in the bleeding control kits are not expired and that any expired materials, supplies, and equipment are replaced as necessary; and
- E. requires a bleeding control kit to be restocked after each use and any materials, supplies, and equipment to be replaced as necessary to ensure that the bleeding control kit contains all necessary materials, supplies, and equipment.

The Corporation's Stop the Bleed program must include each school in the Corporation.

The Corporation may request direction to resources that are available to provide bleeding control kits to the Corporation from the Department of Homeland Security or the State Department of Education.

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Legal

- I.C. 5-2-1-3
- I.C. 5-2-1-9
- I.C. 5-2-1-9(d)
- I.C. 10-21-1-3
- I.C. 10-21-1-9 School Safety Specialist
- I.C. 10-21-1-10 School Safety Plan
- I.C. 10-21-1-11 Executive Sessions for School Safety
- I.C. 10-21-1-12
- I.C. 10-21-1-14 Safe School Committee
- I.C. 20-20-40 Restraining and Seclusion Commission
- I.C. 20-26-5-31
- I.C. 20-26-5-42.7
- I.C. 20-26-16
- I.C. 20-26-16-3
- I.C. 20-26-18.2
- I.C. 20-30-5-11
- I.C. 20-34-3-20
- I.C. 20-34-3-21
- I.C. 20-34-3-24
- I.C. 36-8-3-20
- I.C. 36-8-10-10.6
- 20 U.S.C. 7101 et seq., The Safe and Drug-Free Schools and Communities Act (Title IV, Part A of the Elementary and Secondary Education Act)

Title IX, Section 9532 of the No Child Left Behind Act of 2001

- 511 IAC 4-1.5-7 Crisis intervention plans
- 511 IAC 6.1-2-2.5 Safe schools and emergency preparedness planning
- 513 IAC 1 Seclusion and Restraint in Schools