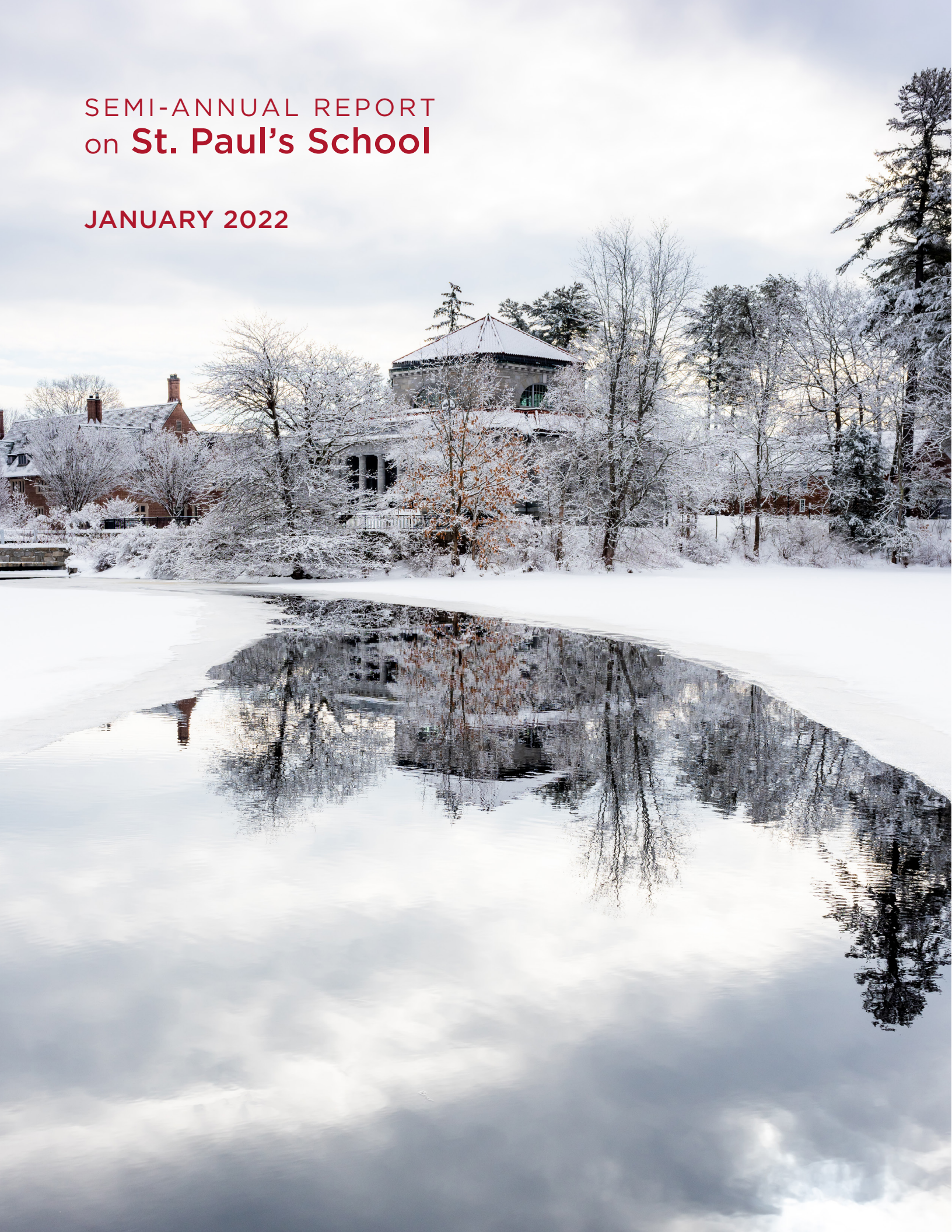


SEMI-ANNUAL REPORT
on **St. Paul's School**

JANUARY 2022



From the Overseer



In 2018, at the conclusion of an investigation, St. Paul's School and the office of the New Hampshire Attorney General entered into a [settlement agreement](#) that would "facilitate the protection of children to a greater extent than a criminal proceeding, and will ensure a system of accountability, oversight, transparency and training." A large part of that agreement focused on the compliance overseer position.

The core of the agreement, and the primary role of the compliance overseer, is to ensure the School maintains compliance with mandatory reporting laws, which include the [Child Protection Act](#), the [Safe School Zones Act](#), and [Student Hazing](#). In short, the Child Protection Act requires schools to report any suspected child abuse or neglect to the New Hampshire Division for Children, Youth and Families (DCYF). The Safe School Zones Act requires any acts of theft, destruction, or violence that occurs on school grounds to be reported to the local Police Department in accordance with a Memorandum of Understanding (MOU). The MOU between SPS and the Concord Police Department is more expansive than the law requires and includes the reporting of any claims of sexual assault involving students or employees regardless of where the assault happened.

Reports of student or adult misconduct can be submitted to SPS through direct, in-person reporting by individuals to faculty or staff members; through the context of medical/counseling settings (Clark House Health Center); or through multiple online reporting functions. All such reports are directed to the Office of the Vice Rector for School Life. Given the complexities of the multiple laws and the added agreement with the Concord Police Department, SPS encourages all adults to "widen the circle" when they become aware of any situation that could possibly fall into these categories. Employees are classified as either faculty or staff. Although members of the faculty typically have more direct contact with students, all employees are required to undergo yearly training that includes reporting requirements and how to maintain healthy boundaries.

The Settlement Agreement mandated the creation of a compliance overseer and for that person to issue biannual reports. I began at the School during the COVID-19 pandemic. It is difficult to learn the ins and outs of an extremely busy institution steeped in tradition, and the restrictions required by the pandemic only hindered this process. A more "normal" opening of School in the fall of 2021 has better allowed me to experience the culture of St. Paul's School.

This is my second biannual report (the fifth since the creation of the position) and will cover the School's work with RAINN (Rape, Abuse, and Incest National Network), an update on the implementation of the Maxient case tracking software, and a listing of reports received, with identifying information removed, since the last biannual report. I found no cases of noncompliance during this period.

Please feel free to contact me at any time with questions, concerns, or ideas. Thank you.

A handwritten signature in cursive script that reads "Donald E. Sullivan".

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Following the departure of the first Compliance Overseer, the NH Attorney General's Office requested, in part, that SPS engage with RAINN (Rape, Abuse and Incest National Network) to complete a "comprehensive program assessment of the policies and procedures at St. Paul's School as they pertain to student safety." RAINN is the nation's largest anti-sexual violence organization. RAINN created and now operates the National Sexual Assault Hotline (800-656-HOPE, or online at rainn.org) in partnership with more than 1,000 local sexual assault service providers across the country. RAINN also carries out programs to prevent sexual violence, help survivors, and ensure that perpetrators are brought to justice.

In July, SPS entered into an agreement with RAINN. The 16-month engagement began with a comprehensive audit and assessment of the School's sexual misconduct prevention and response programming, including its policies, recruiting and onboarding, training, and response. RAINN defines sexual misconduct as "a non-legal umbrella term that describes a broad range of inappropriate behaviors, both criminal and non-criminal. This includes unwanted sexual attention, inappropriate touching, sexual assault, and rape, as well as verbal, cyber, or other types of sexual harassment based on gender presentation, sexual orientation, or other identifying characteristics."

As of the writing of this report, they are nearing completion of the "Discovery Phase" of the project and have administered both a Climate Assessment Survey as well as a Victim and Survivor Outreach Survey. They are in the process of scheduling further interviews and have started the Analysis phase.

Both the Climate Assessment Survey and the Victim and Survivor Outreach Survey specifically invited eligible participants to "opt-in" for a voluntary interview with RAINN personnel to share their experiences with the reporting and response mechanisms at SPS as survivors of sexual misconduct. RAINN also has engaged directly with members of the SPS community through group and individual meetings with key SPS personnel as it formally assesses the School's culture around sexual misconduct prevention and response. By using an organization such as RAINN, survey results can be truly anonymous and confidential and therefore encourages participation. The results of all surveys and interviews will be summarized by RAINN staff and used to give feedback and recommendations to SPS in a way that the source of the information cannot be identified.

This project exceeds the agreement with the Attorney General's Office and will undoubtedly have a positive impact on the policies and procedures surrounding sexual misconduct at SPS, which will, in turn, increase confidence in the system. The final result should be increased prevention, increased willingness to report, improved response and, ultimately, a positive shift in culture.

The staff at RAINN is aware of mandatory reporting laws and if a situation arises that requires a report be made, they are trained and equipped to make any such reports. I am confident that they are meeting all requirements.

Maxient Misconduct Reporting System

SPS continues to implement the Maxient incident reporting software. This centralized system will standardize record keeping and promote transparency and accountability. Although technology can never replace the human response to incidents, a standardized records management system can provide support by increasing transparency and consistency. The School has built its own policies and protocols into the software to act as a guide to standardize the process as much as possible.

An added benefit of the software is that multiple people can be notified when a report is filed by a member of the community. There are two types of reports that were considered when designing the notification system using Maxient: Reports generated from confidential medical appointments and reports received from other members of the community.

- If a counselor (or medical professional) from Clark House learns of a situation that affects student safety or requires an external report to be made, they take steps to ensure immediate student safety, make the required DCYF report if needed, and then file a Maxient report, which automatically notifies the vice rector for school Life (VRSL), the School's medical director, and — for the term of the Settlement Agreement — the compliance overseer. The information is filtered to ensure that privileged student health information is not disseminated improperly. The medical director was chosen as the second recipient of the information due to his ability to receive confidential information from Clark House reports. Although this position reports to the VRSL, the medical director is required by his medical license to take appropriate action.
- All reports that do not originate from Clark House and therefore do not contain privileged student health information are automatically directed to the VRSL, the director of environmental health and school safety, and the compliance overseer for the term of the Settlement Agreement. The school safety director was chosen as a secondary recipient due to his role in ensuring student safety and because he reports directly to the chief operating and financial officer and not the VRSL.

Having more than one person aware of a situation helps to ensure the best possible response and helps to eliminate the possibility that issues are missed or ignored. Using a standardized software program allows for record keeping to be consistent, even if key personnel either change roles or leave employment. Finally, this system helps to eliminate the "single point of failure" that is produced when one person is solely responsible for responding to all incidents.

All employees are still encouraged to make in-person reports first and follow up by filing the appropriate incident/information report through Maxient. There are two primary points of contact available 24 hours a day, seven days a week: the Dean on Duty and Administrator on Duty phones are continuously staffed to provide support to staff, faculty, and students.

Student Support

Standardizing record keeping and response protocols are only effective when you have the proper supports in place for students who have experienced sexual misconduct.

Reports of sexual misconduct can come from many different sources, including directly from the victim, through third-party reports from other students, or from direct witnesses to include adults on campus. These reports can be made directly to an adult or filed through the online reporting systems in place.

The School's primary source of support for victims of abuse on campus is Clark House Health Center. It offers 24-hour medical services to students and is also staffed by school counselors. SPS has four full-time licensed counselors and one half-time licensed counselor, as well as a psychiatrist who comes to campus twice a month and consults with the counselors as needed between visits. The counselors see students during regular business hours in Clark House, and there is a counselor on call 24/7 for any emergencies that may arise.

It is the policy of the School that any student who self-reports or is believed to be the victim of sexual abuse or misconduct be directed to Clark House for initial support and care. This could include a student reporting historic abuse, which would be referred for counseling, or the victim of an assault who would receive medical attention for any injuries, including transport to Concord Hospital if necessary, and then ongoing support coordinated by the counselors.

Other School resources available to students 24/7 include the Dean on Duty, Administrator on Duty, and the School Safety Department.

It also is important for students to have third-party resources available. At the end of the 2021 school year, Kim, the advocate from the [Crisis Center of Central NH \(CCCNH\)](#), who had staffed a location on campus, moved on from her role to further her education. Her presence at the School was a welcomed resource and she will be missed. As of the writing of this report, SPS is still working with CCCNH to fill the position. CCCNH continues to be an available resource to students 24 hours a day by phone. The room dedicated for the advocate is still available for use by the Crisis Center to meet with students should they need space on campus. SPS also will arrange for transportation if a student would prefer to meet at the Crisis Center's office. Contact information for CCCNH is advertised to the students and specifically given to victims.

RAINN also provides a 24-hour Crisis Hotline that is advertised to the students and provided specifically to victims. The Concord Police Department is available 24 hours a day. There is also a 24-hour crisis text line that is advertised through the [SPS Cares network](#).

Reporting Data

The agreement between SPS and the Attorney General's office calls for this biannual report to include a "numerical summary of sexual harassment and or sexual or physical abuse incidents involving students that the Compliance Overseer has been made aware of since the issuance of the prior biannual report to the NHAG."

The following is a list of all incidents reported to DCYF or the Concord Police Department since the last biannual report. There are times when reports are filed out of precaution and with the added thought of safety, even if they are not mandated by statutes. These reports will be indicated by a *. Historically, the VRSL was the sole person responsible for ensuring that reports were properly made. For the term of the Settlement Agreement, the compliance overseer is consulted on all cases that may require outside reporting. Policies and procedures have changed to "widen the circle" when reports are made to ensure proper reporting and student support.

As required, all identifying information has been removed and all reasonable steps have been taken to reduce the ability for anyone to link any of the listed reports to a particular case. The data provided is based solely on the information received with the initial report and is not indicative of any results of or further information learned during the investigation. Because of this, the list may show incidents that were reported by a third party but further investigation may have found that the incident did not happen as suspected.

It should also be noted that SPS reports all cases required under statutory requirements if the information is new to the School, even if the involved party claims that a report has been filed. This is to be absolutely certain that the incident has been in fact reported to the proper authorities. SPS also reports all cases of suspected child abuse regardless of the current age of the victim, meaning that if SPS becomes aware of an adult who was abused or neglected when they were a child, the School will make a report to DCYF and, if required by the MOU, a report to the Concord Police Department as well.

COMPILED LIST OF REPORTED INCIDENTS

REPORTER	OFFENDER	ON/OFF CAMPUS	REPORT	ACTIVE/HISTORIC	REPORT FILED/W
1 Safety	Non-affiliated	On	Possession of marijuana	A	CPD
2 Clark House	Non-affiliated	Off	Sexual assault	H	CPD/DCYF
3 Faculty	Unknown	On	Theft	A	CPD
4 Staff	Staff	On	Simple assault	H	CPD
⁵ Deans	Non-affiliated	Off	Child abuse/assault nonsexual	H	DCYF
6 Clark House	Unknown	On	Distribution of drugs/assault	H	CPD
7 Deans	Student	On	Possession THC	A	CPD
8 Student	Student	On	Possession THC	A	CPD
9 Faculty	Non-affiliated	Off	Simple assault	H	DCYF
10 Parent	Non-affiliated	Off	Sexual assault	A	CPD/DCYF
11 Student	N/A	On	Possession THC	A	CPD
12 Student	N/A	On	Possession THC	A	CPD
*13 Alumni	Former faculty	On	Teacher asking for photos	H	CPD
*14 Faculty	N/A	On	Mysterious dog death	A	CPD
15 Clark House	Parents	Off	Child abuse	H	DCYF
16 Alumni	Unknown	On	Sexual assault	H	DCYF/CPD
17 Parent	Unknown student	On	Simple assault	H	CPD
18 Clark House	Non-affiliated	Off	Suspected attempted sexual assault	H	CPD/DCYF
19 SYA Program	Student	Off	Sexual assault	A	CPD
20 Woodside SCHOOL	Faculty spouse	On	Endangering the welfare of a child	A	CPD/DCYF
21 Clark House	Parents	Off	Possible child abuse	A/H	DCYF
22 Clark House	Non-affiliated	Off	Sexual assault of child	H	DCYF/CPD

*Reports filed out of precaution and with the added thought of safety, and not mandated by statutes.

CPD = Concord Police Department \ DCYF = NH Division of Children, Youth and Families \ SYA = School Year Abroad

ANONYMOUS REPORTS

The online reporting function available to students and the public through Maxient allows the reporter to remain anonymous if they choose. Although there is value in having this option available in reporting incidents, everyone needs to be aware that it can greatly hinder the ability to fully investigate a claim. It also can create the image that SPS is not responding to complaints, since there is no way to report back to the original complainant. I have monitored these reports and the investigations and feel that SPS investigated to the best of its ability given the limited information.