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SEMI-ANNUAL REPORT on St. Paul's School





I am pleased to provide the third semi-annual report pursuant to the terms of the Settlement Agreement between St. Paul's School and the New Hampshire Attorney General's Office. Included is summative data concerning the total number of all matters the School is required to report to outside agencies due to state statutes, or by agreement.

This report and accompanying data are intended to promote transparency regarding reportable issues involving community members or brought to the School's attention, and to examine the School's policies and practices. The information contained herein reflects matters reported between January 1, 2020, and June 30, 2020.

The past six months have been a time of extraordinary challenge and change. Students left St. Paul's School for break on February 29, 2020. Sudden and unexpected world events prevented their return for the entirety of the Spring term. The fully residential experience, a defining attribute of St. Paul's School, was made vulnerable by the novel coronavirus. As a school that values its residential experience as a core component toward the development of meaningful and rewarding relationships, pivoting toward distance learning and instruction created exceptional challenges. Adversity can often strengthen these connections, and it is no surprise that many students are better prepared and more resilient for having this experience, despite the inevitable sense of loss that comes from changes in routine.

The data contained in this report is offered with the understanding that for over four months of this six-month reporting period, St. Paul's School did not have any students on its grounds. The information in this report should be measured accordingly.

In addition to data, this report will examine the hiring protocols at St. Paul's School. Good prevention work is comprehensive and thorough and not limited to training, policies, and reporting obligations. Good prevention work is not only about creating policies, but also about promoting a culture that prevents misconduct from occurring in the first place. These efforts begin well before someone is invited to join the St. Paul's School community.

While this report is narrowly tailored to focus on hiring practices and potential impacts on student safety, it is equally important to recognize that the School's support, retention, and development of employees can also impact student safety. School culture is influenced by structural and policy issues such as employment-at-will, professional development, performance evaluations, and promoting from within in ways that are both foreseeable and on occasion, unintended. Such a review, however, is beyond the scope of this report.

The change experienced as a result of the novel coronavirus pandemic will reverberate in ways both seen and unseen for many years. The adaptability and resilience of St. Paul's students, faculty, and staff can serve as a model for future prevention work. Moving outside one's comfort zone is daunting and difficult. Finding new ways to collaborate, refreshing and updating practices, and introducing new ideas and methods can yield unexpected and surprising rewards.

Sincerely,

A handwritten signature in black ink, appearing to read "J. Maher". The signature is fluid and cursive.

Jeff Maher

Independent Compliance Overseer

Data Summary

DATA SUMMARY

The data presented here includes all reports made to external agencies by St. Paul's School as required by law or agreement. This data includes historical information shared by alumni and other incidents that are indicative of the School's agreement to broader reporting requirements than required by statute.

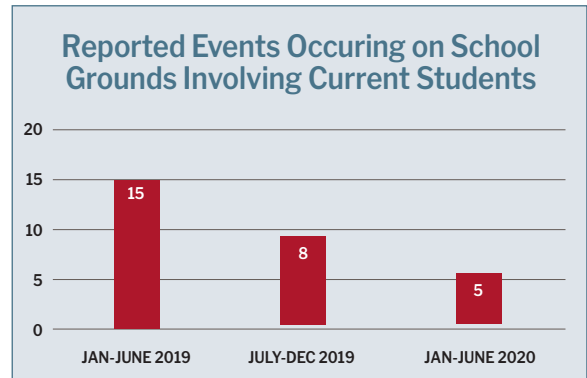
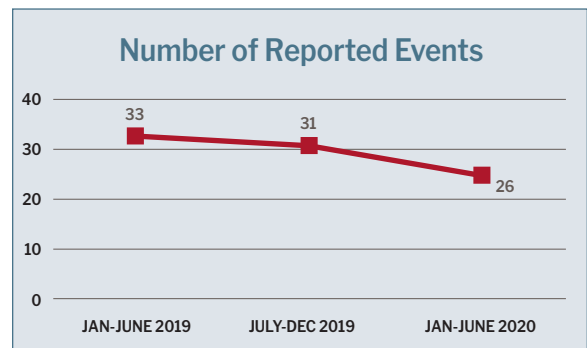
A variety of factors make it difficult to draw meaningful conclusions from the data presented in this report. Nonetheless, these charts include some new information and may permit greater understanding and context concerning the manner and type of incidents which occur in this community.

A reportable event is defined as an incident that is required to be reported to an external agency pursuant to state statute or by other legal agreement or memorandum. An event becomes 'reported' once the School has notice or knowledge of the event. Information about an incident may be received from anyone – parent, roommate, third party, anonymous online tool, alumna/us, etc. The manner in which information is received and the circumstances of the incident shape the School's response.

This chart notes a decline in reported incidents during January-June 2020 which may be, in part, attributable to distance learning as a result of the pandemic.

This chart reflects only incidents that occurred contemporaneously on the grounds of St. Paul's School involving currently enrolled, year-round students. This chart excludes incidents involving historical matters, Advanced Study Program (ASP) students, and any other non-student. It also excludes matters involving students which occur off-grounds, during breaks, or at other times when the school does not exercise supervision of its students.

The total number of externally reportable incidents that involved currently enrolled full-time students and occurred contemporaneously on-campus between July-December 2019 totaled eight (8). As between January-June 2020, this category declined to five (5) owing, in part, to the fact that students were present in Concord, New Hampshire for only seven weeks. While this chart seems to suggest a limited number of incidents, it also demonstrates that fact that disclosures are often delayed, sometimes for months or years, especially when the impacted individual is a minor at the time of occurrence. It can equally be said that disclosures are indicative of a healthy school culture – one where students feel they will be heard, believed, and supported by their peers and adults in the community.



Reported Incidents

External Reports – 26 (January 1 – June 30, 2020)

	Present Day				Historical			
On Grounds				5	4	7		
				12	9	10	14	21
	15	18	19	20	23	24	26	
								6
Off Grounds			11	13	1	2	3	
					8	16	17	
					22	25		

Scope

The terms of the settlement agreement between St. Paul's School (SPS) and the New Hampshire Attorney General's Office limit this semi-annual report to:

- Providing a numerical summary of sexual harassment and/or sexual or physical abuse incidents involving students
- Providing an assessment of the status of SPS policies related to sexual harassment and sexual and physical abuse

 Incidents involving students enrolled full-time at SPS at time of incident.

Reporting Person	Responding Person	Description of Complaint
1 Alumna/us	Non-student	School advised of historical sexual abuse of alumna/us through an attorney
2 ASP Alumna/us	Non-Student	School advised of historical sexual abuse of alumna/us through an attorney
3 Alumna/us	Non-Student	School advised of historical sexual abuse of alumna/us through an attorney
4 Alumna/us	Alumna/us	3rd party report of historical incidents of hazing
5 Student	Unknown	Student reported a theft
6 Alumna/us	Various	Alumna/us disclosed sexual/physical assault, abuse on and off grounds; while a student
7 Alumna/us	Alumna/us	3rd party report of historical incident of hazing
8 Alumna/us	Non-Student	Alumna/us disclosed incidents of historical abuse occurring while a student
9 Alumna/us	Alumna/us	3rd party report of historical incidents of hazing
10 Alumna/us	Non-Student	Alumna/us disclosed historical sexual assault that occurred on grounds while a student
11 Non-student	Non-student	3rd party report of incident that occurred at other out-of-state educational institution
12 Student	Student	Report of a physical assault
13 Student	Non-student	Report of sexual activity not permitted under statute
14 Non-student	Non-student	School advised of historical sexual abuse of alumna/us through attorney
15 Student	Student	Report of a physical assault
16 Student	Non-Student	Report of historical abuse occurring off grounds
17 Non-Student	Not Disclosed	Non-student reported historical sexual assault
18 N/A	Student	Contraband recovered from student's rooms
19 Student	Non-Student	Report of a physical assault
20 Non-student	Non-Student	Report of criminal mischief occurring on school grounds
21 Alumna/us	Alumna/us	Report of a physical assault and bullying
22 Alumna/us	Unidentified	School advised of unspecified misconduct through an attorney
23 Alumna/us	Unidentified	Disclosed incidents of sexual assault
24 Alumna/us	Alumna/us	Report of physical assaults
25 Alumna/us	Unidentified	Disclosed historical sexual assault
26 Alumna/us	Alumna/us	Disclosed historical physical assault

Reporting Person is used in place of terms such as victim, survivor, or complainant. Similarly, the term Responding Person refers to the accused, suspect, or respondent.

Hiring Practices

At St. Paul's School, there exists a complex web of roles that support a far more immersive and enriching student experience than just classroom instruction.

The recruitment of educators is a cornerstone in the foundation of student safety. The unique characteristics of a residential boarding school magnifies the need to hire individuals who not only deliver exceptional instruction but also offer direction in shaping the values, morals, and character of students in their charge. Quite simply, the individuals the school chooses to hire possess the ability to transform the lives of students and positively shape community. Conversely, hiring the wrong individual has the potential to cause incredible harm. Hiring practices are a key component of a comprehensive prevention strategy. For these reasons, the second half of this report examines the hiring practices at St. Paul's School with an eye toward how these practices enhance or detract from student safety.

At St. Paul's School, there exists a complex web of roles that support a far more immersive and enriching student experience than just classroom instruction. Faculty teach daily, serve as advisers, have dormitory supervision duties, coach athletic teams, sponsor clubs, and have innumerable other day-to-day tasks and responsibilities. Without exception, faculty have the most direct contact with students. As a private school, however, St. Paul's School is not mandated to adhere to statutory teacher licensing or certification practices expected of public schools. Similarly, while state law governs who can, and cannot, teach in public schools no similar restrictions exist in New Hampshire independent schools.

Staff also serve in a variety of supportive roles. From business operations to physical plant, to medical and counseling services, to food services and groundskeepers – staff members support the efficient running of school operations. Some staff members also serve as advisors, coaches, or have dorm duty. Staff members interact with students in various capacities depending on their role.

In addition to faculty and staff, other groups of individuals occupy unique roles at St. Paul's School. Faculty spouses and partners occasionally serve in roles in which they may interact with students. Similarly, St. Paul's School engages with a variety of outside contractors, volunteers, external specialists, medical and mental health specialists all of whom may interact with students on occasion.

The complexity of these various roles underscores the need for a methodical hiring process which yields the most highly qualified candidates, ensures alignment with the School's mission and ideals, and supports student safety. It is appropriate to create a multifaceted process when hiring an employee. The level of rigor applied to a hiring decision should, in part, be centered on the level of direct contact the employee has with students. Such is the case at St. Paul's School.

Faculty Hiring Practices

HIRING COMMITTEE

Vice Rector for Faculty
Vice Rector for School Life
Dean of Equity & Inclusion
Dean of Studies
Dean of Students
Director of Athletics
Department Chair

FACULTY

A basic outline of the hiring process is contained in the faculty handbook. The handbook recognizes the strong connection between hiring practices and student safety by indicating that the Rector is empowered “to take all necessary measures for ensuring the safety...of students.”

The hiring process actually begins before a position is vacant or available. The school is always alert to individuals who can contribute positively to the community, even outside of an active hiring season. Each faculty position is benchmarked with expected competencies, performance indicators and behavioral characteristics of the ideal candidate. Prior to posting a position, the School will assess its needs and refine the metrics by which a desirable candidate will be evaluated. This ongoing assessment is updated regularly in collaboration with department heads and is used to inform the content of the job description. It considers factors such as the current needs of the School, alignment with School mission, goals and values, and the needs of an individual department.

The School identifies and recruits interested applicants through attendance at recruitment fairs, hiring conferences, referrals, placement agencies, and by posting positions on its website. Resumes and curricula vitae are received primarily through email and are first reviewed by a hiring committee which consists of a standing team of senior administrators and is complemented by the department chair of the position being hired.

After an initial review, the hiring committee selects candidates for a first round of phone interviews. The candidates are interviewed first by the department chair and separately by the Vice Rector for Faculty. The hiring committee then meets again to discuss these interviews and determine which finalists will be invited to St. Paul's School for a two-day visit.

Prior to arriving in Concord, New Hampshire, the finalists will complete an online assessment. This instrument, which is used in both educational and corporate environments, assists the School in identifying behavioral characteristics, competencies, and the motivational factors of the applicant. This data-driven assessment is reviewed with the candidate by an independent and trained third party prior to their campus visit. A summary report is also provided to the hiring committee for its consideration. The results of the assessment may be helpful in evaluating if the candidate's behavioral characteristics align with the position sought. This process seeks to mitigate implicit bias and measure attributes to determine who can best complement the needs of the School.

During their on-campus visit the candidate will meet with a variety of community members for interviews, including students, department faculty, and the Rector. Each interviewer is provided suggested questions and topics in advance though they are free to engage in more organic conversation. Each interviewer later completes an online form of their impressions and assessment of the candidate's suitability for the position sought. Upon conclusion of all candidates' on-campus visits the hiring committee meets again, reviews and discusses each candidate, and selects a preferred candidate.

Faculty Hiring Practices

Benchmark

Each faculty position benchmarked considering such factors: School needs, mission alignment, department needs, diversity



Hiring Data Sheet

Includes current needs and department and school demographics



Position Posted

Website, recruitment, fairs, referrals, etc.



Hiring Committee Meets

All applications reviewed, some applicants advance

Phone Interviews

One interview with Department Chair; one interview with Vice Rector for Faculty



Hiring Committee Meets

Finalists selected to continue in process

Online Assessment

External party administers and reviews behavioral assessment



On-Campus Interview

Two days of interviews, meetings, and evaluation



Hiring Committee Meets

Review of written feedback

Reference Checks

A minimum of three references plus executive inquiry



Recommendation

To hire applicant made to Rector



Offer of Employment

Finalist offered the position



Background Checks

Criminal, motor vehicle, and educator databases



WELCOME TO SPS



Expansive reference checks are a central part of a rigorous and effective hiring process. For hiring at an educational institution, they are also key to ensuring student safety. St. Paul's School takes full advantage of the opportunity to evaluate the suitability of all candidates by speaking with their current employer and additional references. A minimum of three references are contacted prior to an offer being extended. Two references must include individuals who supervised the candidate. References are contacted by phone and asked a series of written questions that include inquiries into appropriate boundaries with students, appropriate relationships with students, and other questions which probe the exercise of good judgement in personal and professional spaces. The responses to these questions are memorialized and retained indefinitely. The School also retains responses for individuals whom are not hired.

Prior to a final hiring decision, the Rector will contact the Head of School/Principal from the sending institution if the candidate is currently employed as an educator. The Rector will inquire about the sending school's knowledge of concerns or complaints about the candidates conduct. The responses to these questions are preserved in writing and intend, in part, to determine if there is a history of judgment issues or boundary violations that would cause the school to question whether the candidate's hiring would further the goal of ensuring student safety. This document is also retained indefinitely.

Should this review raise no concerns, a contingent offer of employment is extended to the successful finalist. The offer is contingent upon completion of a background check. Verification of education and experience is accomplished through the receipt of transcripts and contact with former employers. St. Paul's School utilizes a local vendor to facilitate criminal background checks. The check includes criminal and motor vehicle history.

A criminal background check is necessary but can be of limited value and should not be the only source of inquiry. Such checks typically only report on criminal convictions but will not include charges filed and dropped or charges resolved without a conviction. There are many reasons criminal charges could be filed but ultimately not prosecuted. Furthermore, most states allow for annulment or expungement of certain charges and those charges could still be relevant to an assessment of a candidate's suitability for employment. State and federal statutes govern what information is available through a non-governmental criminal background check. A provision of the 2006 Adam Walsh Child Protection and Safety Act allows private entities, such as St. Paul's School, access to national criminal history databases. Access to such databases requires fingerprinting. St. Paul's School is evaluating if requiring a fingerprint-based background check will enhance the depth of its existing system. A fingerprint-based background check would align St. Paul's School with the statutorily required practices of New Hampshire public schools.¹

¹ RSA 189:13-a

Staff Hiring Practices

St. Paul's School requires all spouses/partners and all adult children who reside in school housing to have a criminal background check.

St. Paul's School does ensure that criminal record checks are run not only in New Hampshire, but also in other states where the applicant may have lived. Given the international nature of the School, it is not uncommon to receive applications from foreign countries. For such individuals, the School requires that the applicant provide an attested copy of their criminal background check from their home country.

Faculty are required to live on grounds as a condition of employment and hiring a new faculty member often introduces their partner and children to the community. St. Paul's School requires all spouses/partners and all adult children who reside in school housing to have a criminal background check.

St. Paul's School also checks applicants against a New Hampshire Department of Education list of educators with suspended or revoked teaching licenses. Unfortunately, the quality and scope of such information on a national level varies from state to state. There is no nationwide requirement to report educator misconduct nor national standards on information sharing. This is one reason why St. Paul's School always takes the additional step of contacting the sending school or institution. St. Paul's School also subscribes to a voluntary national database that list school employees who have had adverse action taken against them but may not have resulted in a criminal conviction. St. Paul's School is one of only two schools in the State of New Hampshire that subscribe to this database.

In the absence of national standards or a government-coordinated national database for educator misconduct, St. Paul's School is exercising appropriate due diligence regarding background checks.

STAFF

Positions for staff include dozens of roles in support of students that do not involve classroom instruction. The hiring practices for these positions are varied and differ from faculty positions. Staff hiring is frequently led by the Director of the department who holds the vacant position with support from Human Resources

Available staff positions are commonly first posted internally. If no candidate is selected, the position will be posted on the School website and through job search sites. Applications and resumes are received through email, U.S. Mail, or dropped off in person. For staff positions, a handwritten application supplements the submission of accompanying paperwork. The application requires the candidate to disclose any criminal convictions that have not been annulled. St. Paul's School is in the process of shifting its application process to a web-based software platform. This will support a more efficient and standardized review process while allowing for the collection of helpful compliance-related data.

The hiring manager, most often the department director, will review the applications and identify candidates for an interview with support from Human Resources. While some variation exists between departments, many staff positions begin with a phone interview followed by an in-person interview with Human Resources and the hiring manager. Once a preferred candidate is identified, Human Resources will conduct at least two reference checks. As with faculty positions, memorialized questions are designed to gauge the applicant's suitability for the position and for working at a school. The responses to these questions are retained indefinitely.

Hiring Practices

A multipage, 'new hire' checklist ensures that all necessary steps are completed before an individual arrives for their first day of work.

All offers are contingent on the successful completion of a background check. The background check is the same for staff as it is for faculty. When a background check reveals a matter of concern, as happens on occasion, the School has a process for further inquiry. A written protocol guides the decision-making process which, by its very nature, must be approached on a case-by-case basis. For instance, a conviction for reckless driving for an individual applying for a shuttle driver position may require a different response than for an individual applying to be a cook.

A multipage, 'new hire' checklist ensures that all necessary steps are completed before an individual arrives for their first day of work. In addition to confirming completion of background and reference checks, these steps also include signed affirmations of receipt and review of the St. Paul's School Code of Conduct and Computer Use policy.

OTHER ROLES

As with any complex organization, not every role fits neatly into a category. While the vast majority of St. Paul's School employees can be classified as either faculty or staff, the school also engages with independent contractors and other professionals. Additionally, unanticipated departures or staffing issues sometimes require sure-footed agility on behalf of school administrators. On occasion advisers, coaches, and adults on 'dorm duty' are filled by non-faculty employees.

For example, the advising system is designed to foster accessible, authentic, and appropriate adult-student communication and contact in guiding students through the challenges and rewards of adolescence. An adviser serves as a bridge between students, parents, and the school. Most advisers are residential faculty. That is to say, faculty advisers live in an apartment attached to a student dormitory or in other residences on the grounds. However, some adviser positions include faculty spouses or other non-residential staff.

Similarly, 'dorm duty' is required of all faculty and entails maintaining an adult presence in the dorms and facilitating nightly check ins. This is an oversimplification of the role, however. Dorm and adviser responsibilities serve as an early warning system for students whose success at St. Paul's School could be at risk. It allows a level of interaction not present in the classroom. And recognizing that student education occurs in all places and spaces, it allows St. Paul's School to teach even when students do not realize that they are learning. As with advisers, from time to time St. Paul's School will assign non-residential staff, spouses, or other individuals to dorm duty.

While this report does not suggest these individuals are less qualified or capable, the high level of student interaction and engagement within a dormitory setting demands not only an equally systematic selection process but also, strong onboarding and training to fill the inevitable gaps that will exist for individuals who are not as deeply and consistently engaged in the routines and practices of St. Paul's School.

Hiring Practices

Ensuring a consistency of process for all positions mitigates risk, supports accountability, and reduces the likelihood that critical information is undetected or overlooked.

ADVANCED STUDIES PROGRAM (ASP)

The Advanced Studies Program (ASP) welcomes roughly 240 rising New Hampshire seniors for five weeks of challenging academic and personal growth each Summer. The approximately 75 faculty and staff invited to lead this program are term employees. They engage with students in ways analogous to the regular academic year – teaching, supervising athletic endeavors, and maintaining an adult presence in the dormitories in the evening.

The majority of teaching positions are filled by full time St. Paul's School faculty, independent school teachers, college-level professors and other educators licensed by the State of New Hampshire. Teaching positions do not generally involve a residential component. ASP employees also include house supervisors and interns. These positions are residential. The house supervisors are commonly recent college graduates who have been with the program for a number of years or are affiliated with St. Paul's School in other ways. Each supervises three interns. These interns are most often college students. The interns serve as teaching assistants, residential staff, and assist with recreational activities.

ASP hiring is managed almost exclusively by the Director of the program. The Director recruits, interviews, and extends verbal offers to suitable candidates. For teaching and house supervisor positions, the Director receives a resume or curriculum vitae. Any reference checks are memorialized with notes to a file. For intern positions, the Director receives a written application that includes a resume, personal statement, transcript, and two letters of recommendation. The letters serve as a reference check. The written application is specific to the SPS program and does not ask about criminal convictions. The retention of documents and the location they are in which they are stored varies depending on the position. For each newly hired position, Human Resources will complete a background check on the candidate. The criminal background check is the same as for year-round school employees. Returning employees may be required to complete an annual affirmation in lieu of a background check.

The minimal age differential between a college-aged intern and rising high school senior is an area of concern magnified by the School's reliance on letters of recommendation in lieu of reference checks. The ASP program may wish to formalize reference checks for these positions similar to what is in place for year-round faculty. In addition, as the staff employment application process transitions to a new software platform, ASP may wish to take advantage of this shared service. Ensuring a consistency of process for all positions mitigates risk, supports accountability, and reduces the likelihood that critical information is undetected or overlooked.

Policies Worth Noting

Some practices at St. Paul's School are worthy of mention even though they occur after the hiring process is complete.

AFFIRMATION STATEMENTS

Criminal background checks for employees are updated every five years. However, each School employee is required to attest annually, in writing, that there has been no change in their background. This annual affirmation, which is required of both faculty and staff, covers conduct that is actually broader than what would be available in a criminal background check. It covers all conduct that resulted in an 'arrest, charge, indictment, or conviction (including motor vehicle offenses)'. This affirmation also extends to non-employee family members residing in school-provided housing. These affirmation statements are retained in an employee's personnel file indefinitely.

LETTERS OF RECOMMENDATION

It is important to have clear procedures outlining who can provide letters of recommendation for current and former employees of St. Paul's School. Such practices can be an important first step in thwarting the practice of "passing the trash." St. Paul's School requires any individual seeking to write a letter of recommendation obtain approval from the Vice Rector for Faculty and/or Human Resources. Any recommendation provided on behalf of the school is retained in the employee's personnel file. Coworkers are not authorized to provide a reference on behalf of the school and must notify a Vice Rector before speaking with another school. These measures are designed to prevent providing a reference when the School may possess information that an employee is otherwise unaware of. This single process applies to both faculty and staff and has been in place for approximately six years.

These measures are commendable, and most effective when a hiring school actually makes an inquiry of the sending school. A consistent practice between a group of schools coordinated by a regional or national association could increase the effectiveness of these procedures.

Notwithstanding historical matters, St. Paul's School has adopted procedural safeguards to ensure that future employers are fully informed about any concerns that may have presented during a former employee's tenure.

CONCLUSION

It can be easy to overlook the importance of hiring practices when considering the steps needed to further develop healthy school culture – free of sexual misconduct. St. Paul's has demonstrated that it rigorously screens potential employees, particularly those who interact closely with students. The School has implemented virtually all hiring recommendations of the NAIS/TABS Independent School Task Force on Educator Sexual Misconduct and has crafted additional measures beyond those recommended. The hiring practices of any employer are guided by state and federal laws designed to prevent discrimination and other improper practices but, at times, can intersect with hiring methods in unintended ways. SPS, has demonstrated through recent actions that it will place its ethical obligations equal to, or in front of, its legal obligations.

St. Paul's School, like other institutions, has had to reckon with historical failures in keeping students safe. While no background or reference check alone can screen out which employees are more likely to offend, the School has instituted meaningful and notable measures to ensure such individuals are neither invited into this community, nor referred to another school.