CORRECTIVE ACTIONS

Having reviewed MTO’s investigation report and reached the conclusion, among others, that the Board and the School fell short and failed to properly protect its students and alumni, the Board is committed to working with the School administration to implement the following corrective actions to prevent and address sexual misconduct.

In developing these corrective actions, the Board was guided by the 2018 report of a joint task force of the National Association of Independent Schools (NAIS) and The Association of Boarding Schools (TABS) setting forth best practices and recommendations for schools to follow regarding the prevention of and response to educator sexual misconduct. The Board also was guided by lessons learned from the investigation report and by important input from the School administration.

The Board recognizes that the School already has taken a number of significant steps to implement many of these corrective actions. Some of the corrective actions will benefit from discussion with and input from various stakeholders in the Thacher community prior to implementation. For that subset of recommended actions, the Board will support the Head of School in creating a task force that can seek that input and weigh various considerations before making further recommendations to the School administration on implementation.

The Special Committee will remain in place for six months to monitor implementation of these corrective actions. Beginning in January 2022, the Programs Committee of the Board will monitor implementation of corrective actions and report to the Board.

1. Support Students

The School will take concrete steps to better support students, to encourage the reporting of sexual misconduct so that students can get the help they need, and to better support students who have experienced sexual misconduct. Those steps include the following:

- Enhance and improve counseling resources and confidential access to counseling resources.
- Destigmatize the use of mental health services.
- Consider changes to reporting channels for sexual misconduct, including possible options for anonymous reporting. Create a direct channel of reporting to the Board for misconduct involving Head of School, other senior administrators, or their family members.
Explore entering into a Memorandum of Understanding with a local rape crisis center, which can serve as a confidential resource for students.

Establish a protocol for providing supportive measures for students who report sexual misconduct to the School.

Create a formal system for transitioning advisees from one advisor to another, to ensure continuity of knowledge and support.

Ensure a support network for students who report sexual misconduct and create spaces for students to support one another in healing from the effects of sexual misconduct.

Consider changes to student discipline policies, including possible adoption of an amnesty policy for students who report sexual misconduct.

Revise the student Social Hour to allow for some opportunities for interactions outside of late night hours.

The Task Force will consider and make further recommendations on the details and implementation of some of these items, including efforts to encourage the use of mental health resources, changes to student discipline policies, and changes to reporting channels.

2. Improve Training and Education

The School will take a number of actions aimed at improving culture and aligning with best practices the School’s efforts to prevent, detect, and appropriately address sexual misconduct.

For faculty and staff, the School will take actions that include the following:

- Improve the content and format of faculty boundary guidelines trainings.
- Improve mandatory reporter training.
- Provide trauma detection training and trauma-informed interviewing training.
- Provide training on addressing sexual misconduct in LGBTQ+ relationships and same-sex situations.
- Provide specific training for faculty with residential life and advisor responsibilities.

For students and parents, the School will take actions that include the following:
THE THACHER SCHOOL

- Ensure that every student understands healthy interactions and relationships with other students and adults. Educate and empower students to identify, call out, and seek help for unhealthy situations, including through setting clear expectations for doing so under the Honor Code and fostering a culture that embraces those who speak up.

- Make significant changes to the content and format of education for students on various topics related to sexual misconduct — including, for example, affirmative consent, prevention and response to sexual harassment and sexual assault, and recognizing grooming behavior by adults.

- Provide training for students and parents on faculty boundary guidelines.

- Provide training for students and parents on mandatory reporting obligations.

- Provide education on the potential consequences and discipline process for sexual misconduct.

The School has implemented some of these changes already or will implement them by the start of the 2021-2022 school year. The Task Force will consider and make further recommendations regarding changes to the School’s sexual education program and education on the potential consequences for sexual misconduct. In addition, the School will work with the Task Force to:

- Examine gender bias at Thacher and its effect on the School’s efforts to prevent, detect, and appropriately address sexual misconduct — and develop strategies to reduce such gender bias.

3. Improve Response to Allegations of Sexual Misconduct by Adults

The School will take corrective actions applicable to faculty and staff (as well as to their adult family members living on campus), including the following:

- Adopt a comprehensive protocol for handling incidents of adult-on-student sexual misconduct — which will include, for example: providing appropriate support for and protection of complainants, fairness and equity for complainants and respondents, engaging a third-party investigator trained in trauma-informed interviewing, where appropriate, and setting clear expectations for mandatory reporting. The protocol will include establishment of a standing incident response team with appropriate training in responding to allegations of sexual misconduct.

- Strengthen content and enforcement of boundary guidelines, which apply to faculty-student interactions.
● Adopt policies excluding those credibly reported to have committed serious sexual misconduct from School events and activities.

● Adopt policy on communications to the Thacher community and to potential future employers regarding departing employees.

● Supplement the School’s existing practice of conducting background checks on every new hire and strengthen restrictions on hiring individuals reported to have engaged in sexual misconduct.

The Task Force will consider what level of conduct merits excluding those credibly reported to have committed serious sexual misconduct from School events and activities.

4. Improve Response to Allegations of Sexual Misconduct By Thacher Students

The School will take corrective actions, including the following:

● Adopt a comprehensive protocol for handling incidents of student-on-student sexual misconduct, which will include, for example: providing appropriate support for and protection of complainants; providing fairness and equity for complainants and respondents; engaging a third-party investigator trained in trauma-informed interviewing; where appropriate, making revisions to the Faculty Committee process; and setting clear expectations for mandatory reporting. The protocol will include establishment of a standing incident response team with appropriate training in responding to allegations of sexual misconduct.

● Consider discipline for certain off-campus conduct, such as sexual misconduct, which results in harm to members of the School community.

● Establish formal agreements with partner programs such as the Maine Coast Semester at Chewonki and School Year Abroad, to enable the School to learn about sexual misconduct by Thacher students who are participating in those programs.

● Adopt policies for handling students disciplined for serious sexual misconduct (or who have withdrawn or left campus as a result of such allegations) – to address issues including, for example, communication with a student’s subsequent schools or colleges, awarding of diplomas, and exclusion from School events and activities.
The Task Force will consider and make further recommendations regarding revisions to the Faculty Committee process, the handling of discipline for off-campus conduct, and the handling of students disciplined for sexual misconduct.

5. **Strengthen Board Training and Oversight**

The Board has committed to improving and strengthening its oversight, including the following:

- Provide the Board with regular, ongoing training and education on sexual misconduct prevention and response.
- Increase Board oversight over sexual misconduct issues, including establishing a reporting expectation for the Head of School to the Board.
- Review the results of periodic campus climate surveys, discussed further below.

6. **Adopt General Strategies to Reduce the Risk of Sexual Misconduct**

The School has already:

- More fully integrated the School's afternoon programs and residential life programs, to ensure the sharing of information about faculty and student conduct.

And the School will also:

- Conduct periodic campus climate surveys to better understand students’ perceptions and experiences, identify strengths and areas for improvement, and measure progress on sexual misconduct prevention and response.