Promoting Student Safety and Wellbeing at Grace

Nothing is more important to us at Grace than the wellbeing of the children entrusted to our care. That’s why our response to historical reports of sexual abuse has been guided not only by a desire to honor and support the survivors, but also by a commitment to do all in our power to safeguard the health and safety of all current and future Grace students. We acknowledge that significant progress has been made in recent years to strengthen our child protection measures, and yet the key issues articulated in Cozen O’Connor’s Report of External Investigation of Historical Allegations of Abuse at Grace and in the recommendations of the External Review Committee Report on Sexual Harassment and Misconduct (ERC) call our attention to areas where there is more work to be done. Most notably:

- The School must ensure that all members of our community clearly understand when and how to report concerns around boundary violations, misconduct, or abuse.
- There must be greater coordination and alignment in the child protection policies of the Church and the School, and the School must ensure it has appropriate involvement in the oversight of any aspect of School life that either takes place in the Church or involves Church personnel.
- The School must better define its processes for investigating reports of misconduct, for determining when a third-party investigation is warranted, and for managing communication with the broader community around such reports.

Corrective Actions

The recommendations from the External Review Committee were informed in part by a benchmark report jointly issued in 2018 by the National Association of Independent Schools (NAIS) and The Association of Boarding Schools (TABS) – entitled Prevention and Response: Recommendations for Independent School Leaders from the Independent School Task Force on Educator Sexual Misconduct. We are using this report, in conjunction with the recommendations of the ERC, as we implement the corrective actions identified below. We pledge to engage in this process swiftly, and, in fact, much of this work is already underway. The Board has created a task force of Grace trustees and administrators, who will evaluate these recommendations, suggest additional protective measures to the Board, and ensure their timely and thorough implementation.

1) We will redouble our commitment to professional development in this area for faculty, staff, and trustees by enhancing existing requirements and adding additional training around maintaining professional boundaries, promoting healthy relationships, and preventing misconduct and abuse.

- In 2019 the School codified its expectations around professional boundaries in the Grace Guidelines for Professional Relationships with Students document. All Faculty and Staff
acknowledge and affirm their understanding of these standards annually. But there have been gaps in training in the implementation of these guidelines. Part-time staff (e.g., coaches), contracted employees (e.g., catering staff), and volunteers have not generally received the same level of detailed instruction as full-time faculty and staff. Beginning in the 2022-23 school year, the school will revamp its training protocols to expand the numbers of adults receiving instruction in following and enforcing these boundaries.

- In April 2020, Safe Space Advocates participated in a training with child safety experts from Prepare, Inc., to recognize predatory strategies of persuasion. This fall, Prepare led training for all faculty and staff on promoting healthy boundaries, responding when you see boundaries being crossed, and creating a climate of safety for our students.
- The Board of Trustees has committed to receiving in-person training this spring or summer in recognizing and responding to signs of sexual abuse and assault.
- We are committed to regular professional development around maintaining professional boundaries and recognizing signs of abuse and misconduct. In past years, we have often hired outside professionals to conduct in-person training; going forward, we will make sure to do such a training at least once a year.
- We will work to ensure that every adult who regularly works on the GCS campus, even those who are not GCS employees, is trained on these topics.
- We will continue to conduct mandated reporter training, doing so for all employees annually at the start of each school year.

2) We will continue to expand the scope of the student Health & Wellness Curriculum as well as parent education opportunities around healthy relationships, consent, and preventing and recognizing signs of misconduct or abuse.

- Since 2019 we have expanded the Health & Wellness curriculum in the high school and middle school. Middle and high school students take courses each year in sexual health and wellness, including a required ninth grade violence prevention and personal safety course taught by partners from Prepare, Inc, and a required tenth grade human sexuality and substances course. To fulfill their lab studies requirements, eleventh and twelfth grade students must additionally take a certain number of classes related to personal wellbeing, skills and literacies; in recent years, those have included courses like “Blurred Lines: Media & Rape Culture” and “Understanding Power & Control: Consent vs. Coercion.”
- This year Grades 7 & 8 participated in a 6-hour workshop on personal safety and violence prevention with Prepare. Beginning next year, we hope to incorporate Prepare training directly into the sixth grade Health & Wellness curriculum.
- We commit to regular ongoing talks for parents with at least one each year relating to fostering healthy relationships, personal safety, and recognizing signs of misconduct or abuse. Parent education programming in 2020-21 and 2021-22 has included the following topics:
  - Parenting through Traumatic Times
  - Risk and protective factors in raising emotionally healthy kids & adolescents (with Rachel Henes)
3) In response to the findings of the External Review Committee we will strengthen community awareness of when and how they should report instances of boundary crossings, misconduct, or abuse.

- The GCS Personnel Manual now clearly outlines not only the requirement but also the process for responding to a potential boundary crossing. The policy states “If a Grace adult receives information that a boundary has been crossed by an adult or student, he or she must pursue it, whether the information is a direct complaint or is obtained in some other manner such as from an individual overhearing a group conversation.”

- In response to the finding of the External Review Committee that not all Grace adults are clear about what to report, when to report, and/or how to report, beginning in the fall of 2022, we will train all Grace faculty and staff on both the policy and the reporting process at the start of the school year, developing case studies to illustrate examples.

- We will heighten the visibility and expand the number of Faculty and Staff Student Support Guides (SSG). The SSG program was established to increase the number of adults in the community trained in best practices for student support. Currently in the High School 18 SSG’s serve as a sounding board for students to work through issues out loud with a trusted adult or they provide recommendations for additional resources, support or interventions as needed. Each SSG participates in a 3-part training with Prepare Inc and Dean of Student Life Ilana Laurence on mental health 101 + student risk assessment, protocols for student disclosures, and trauma-informed support. We will train an additional cohort of faculty from the high school this spring and add in middle school advisors in the 2022-2023 school year.

- A website (gcschool.org/SSG) was launched as well as a poster campaign throughout the HS building to enable students and families to easily identify Student Support Guides and to access a curated list of outside resources in the fields of mental health, substance use, sexual & reproductive health, and gender & sexuality. Additionally a form is linked within the website for students who would like to alert SSGs to something anonymously.

- We will ensure that Grace adults are aware of the mechanism for direct reporting to the Board in the event of a concern about the Head of School or a senior administrator.

4) We will re-evaluate our communication protocols to ensure that we respond in both a comprehensive and sensitive way when incidents of boundary crossing or sexual misconduct occur.
• Based on the feedback shared in the External Review Committee report, we will improve communication about investigations and responses to reports of misconduct.
• We will partner with an outside expert to review our current protocol and understand best practices.
• We will share with both the adult and student community what the process is so that they know what to expect if they make a report.
• We will ensure they know to whom they can go with questions about the process.
• We will utilize case studies to enhance the communities’ understanding of our process and to help highlight the facets of the School’s response to reports that are standard as well as those that might vary according to specific circumstances.

5) We will re-examine the composition and efficacy of the Child Protection Team to ensure that it is best positioned to swiftly, thoroughly and effectively respond to reports of boundary crossings or misconduct.

• Presently, the two Guidance Committees have functioned as the Child Protection Team. This makes sense for concerns about students that arise organically. But the Guidance Committee is not staffed to receive or evaluate concerns about employees. Given the way boundaries concerns are typically reported (often to the HR Manager or to the Assistant Head of School, neither of whom typically serves on either Guidance Committee) this model limits the efficacy of those committees to serve as the school’s Child Protection Team. This team will be reorganized effective July 1. We will use this Spring to discuss its ideal composition of this, but it is likely to include:
  ○ The Head of School, Assistant Head of School, Dean of Faculty, HR Director, Dean of Student Life, and one of the school counselors
  ○ The Head of School will expand/contract the Team as needed to include relevant personnel such as Division heads or nurses
• The team will participate in regular scenario-based training sessions
• We will partner with an outside expert to review our current Child Protection Team structure and to ensure it is consistent with best practices for investigating and responding to reports of boundary violations, misconduct, or abuse.
• We will implement a protocol to ensure continuity of information when personnel changes occur

6) We will establish criteria that would trigger the use of third-party investigators into allegations of sexual misconduct.

• In some instances a third-party investigation is required to ensure a thorough, impartial investigation
• The Board and the Head of School will engage an outside expert to support the development of a rubric for the School to use to determine when it is necessary to engage an independent investigator for reports of misconduct or abuse.

7) Consistent with the recommendation of the External Review Committee and to ensure that Grace Church policies work to advance the safety and wellbeing of Grace students, we
will conduct a side by side review of Grace Church and Grace Church School child protection policies and protocols.

- Grace students spend time within Grace Church (for chapel, for instance), and certain Grace Church employees have roles at the School (e.g., as teachers of Bible classes) or may from time to time cross paths with students. We must ensure that the child protection policies of the Church are aligned and coordinated with those of the school.
- The Church and School have agreed to have the Joint Committee—a standing committee of both the School's Board and Church’s Vestry, composed of the Head and Board Chair of the School and the Rector and Senior Warden of the Church, among others—conduct a side by side review of School and Church child protection policies. The Joint Committee meets at least three times a year, and its business consists of financial arrangements, physical space concerns, and any other issues of joint interest to the two institutions.
- The Joint Committee will share and review the child protection policies of the two organizations annually.

8) We will partner with Grace Church to ensure clear communication between the Church and the School in the event of a report of misconduct involving an employee of the Church.

- The Joint Committee will review and strengthen protocols for responding to reports of boundaries violations involving children within either institution to ensure that the appropriate personnel at the other are aware of the report, the investigation, and its findings.
- The Joint Committee of the Church and School began this review at their February 11th meeting.

9) We will expand the scope of our an annual audit of physical spaces and operational measures related to student safety both at the School and in the Church

- We have already conducted an audit of physical spaces to identify offices and classrooms that need physical modifications. We will use the results to create a plan that ensures our physical spaces promote our child protection protocols.
- The task force, partnering with the Director of Facilities, will research best practices around signage, ID policies, and video surveillance, making a recommendation to the Head of School about possible enhancements to our protocols for ensuring student safety.