

The Shelby Cullom Davis '26 Head Master

December 2017

Dear Members of the Lawrenceville Community,

Many of you will recall that I sent a letter to our community in <u>June 2016</u> aimed at bringing to light any reports of adult-student sexual misconduct at Lawrenceville, whether past or present. The impetus to send such a communication arose not from any specific allegation or incident, but rather our fundamental, ongoing responsibility and concern for the wellbeing of both current and former students. From the start, the Board of Trustees leadership supported a rigorous and thorough process and has been deeply involved throughout.

My purpose in writing now is to report back on what we have learned to date through careful due diligence and review of our past, as well as to offer more detail on our current, robust processes that promote student wellbeing. To summarize, in the nearly 18 months since we invited people to come forward with information, we conducted extensive interviews, including all available former head masters, deans of faculty and deans of students, and other long-term faculty members. We were supported throughout by outside counsel, who also reviewed hundreds of pages of School files and researched available public records.

To date, the School has not received any firsthand reports from victims about sexual contact or sexual relationships between faculty and then-current students as part of this process. There were four past incidents (the most recent of which occurred more than 25 years ago), which were deemed to constitute serious misconduct. Of these, the three most serious incidents, which were known, reviewed, and addressed by the School at the time they occurred, involved physical contact with a student and resulted in the dismissal of the teacher immediately after the misconduct occurred. The fourth incident did not involve physical contact with students, but clearly constituted serious harassment.

It is important to underscore that what we are reporting here is based on our current understanding of the information that has come to our attention up to this point. I want to further emphasize that we remain open to hearing from anyone in our community with additional information to share.

As a case in point – as this letter was being prepared, we became aware of separate allegations (detailed below) against a married couple who lived on campus from 2013-2017. We communicated these allegations to faculty and staff, parents, and recent alumni/ae in a letter earlier this month. The allegations of inappropriate behavior relate to other academic institutions, and our review of the matter has not given us any reason to suspect that such behavior took place on Lawrenceville's campus or with our students. Nonetheless, we take the matter very seriously and encourage anyone with information to come forward.

## **Our Approach**

The information outlined in this communication is based on a rigorous review process. Our objectives were (1) to examine known past incidents of misconduct and how they were addressed, and (2) to learn about incidents of misconduct that were not known to School administration but which may have been known or suspected among our alumni/ae community, members of the School's faculty and staff, trustees, and others with a significant connection to Lawrenceville.

Even prior to sending the <u>June 2016</u> community letter, a working group formed to begin assembling information about past incidents and to prepare for the outreach to and response from the School community. The working group was headed by me, and also included senior members of the administration, supported by a member of the Board of Trustees and the School's regular outside legal counsel, Windels Marx Lane & Mittendorf, LLP, which included a former prosecutor for the U.S. Attorney's Office for New Jersey. Although we were open to doing so if any report or information made it advisable, we determined not to retain "independent counsel," believing that using the Windels firm, given their past work with the School and knowledge of our staff, would facilitate a thorough review of the matters of which we were aware. This conclusion benefits from the fact that I am relatively new to the School, and that none of the individuals in our working group (other than the former Medical Director) were employed at the School when any of the most serious incidents occurred.

In anticipation of interviews with individuals coming forward in response to the community letter, we designed specific procedures to maintain confidentiality of interviews and any follow-up investigation, and we developed a post-intake interview protocol to assess the nature and gravity of the reports to determine the necessary ensuing due diligence. Our protocol included evaluating whether there was a threat to the safety and wellbeing of an individual in the

community, determining the level of abuse or impropriety, and assessing the degree to which the specificity of the information provided a reasonable basis for further review.

Unless proven otherwise, we assumed that all information shared was done in good faith, and as such, we treated all reports as sincere and worthy of diligent review. Given the uneven nature of some of the second and thirdhand information, often without dates or names, we conducted a more extensive set of interviews with former head masters, former deans of faculty, former deans of students, and long-serving faculty members, many of whom spent long stints as housemasters. The interviews by and large were consistent with the content of the second and thirdhand information provided by those who came forward following the June letter.

## **Summary of Inappropriate Contact and Misconduct**

We reviewed each reported incident, as well as any incidents previously known to the School but not reported by a member of the community as part of this due diligence process, to determine if there was credible information or evidence of serious sexual misconduct. We defined serious sexual misconduct as an act of a sexual or intimate nature between a faculty member and then-current student – whether a single egregious physical act or a series of less egregious acts that together could have the effect of harming the student physically or emotionally.

We regard four previously known incidents as fitting into this category. While none involved sexual intercourse or a sexual relationship, and none were reported by victims in response to our due diligence, we consider these incidents serious misconduct. Three of the incidents involved inappropriate physical touching, and in each instance the faculty member was terminated or required to retire with no further contact with students. The fourth instance of serious adult misconduct involved a wholly inappropriate form of discipline, which was clearly harassment; we have no information that it involved any physical contact with students. To date, no known cases or allegations have surfaced involving more intrusive or traumatic sexual contact by a faculty member with a student.

The first incident involved a new teacher who was fired after less than two years with the School in the 1960s due to inappropriate contact or attempted inappropriate contact with a student. The School file offers few details, but there is record of a subsequent letter of support for the former teacher to a graduate program for further study. We found no evidence that the individual returned to work in a secondary school environment, and he apparently passed away in the 1980s.

The second incident occurred in the 1980s. The School learned that a student experienced a sexual assault or attempted sexual assault in the form of groping. The teacher, who had been at the School for a little more than one year, was required to resign the next day. The terse letter from the Head Master, which was provided to the teacher at his departure, stated that the teacher resigned mid-year for reasons "which he can explain himself," recited factually his duties at Lawrenceville, and recited that he had come to Lawrenceville with references from other schools. The letter did not specify that he was fired or why he left the School, and while it is at best a very cold sort of recommendation with scant endorsement, it is still not a letter that would be provided under similar circumstances today. We were unable to confirm that the School reported this case to any local authorities, which would have been a requirement at the time and which we would do today in response to such an incident. The same teacher had been reprimanded previously for failing to maintain appropriate boundaries with students related to alcohol usage, but that instance did not involve physical contact with a student or activity of a sexual nature. We found no evidence that the individual went on to work at a secondary school. As part of our due diligence process, counsel attempted to contact the former faculty member for comment, but received no reply.

The third incident was a matter reported by the local press at the time it occurred in 1992. In this instance, several students reported that a long-time administrator and coach had inappropriately touched and kissed them. The circumstances were reported to the State child protective services, which conducted a confidential investigation. The School conducted its own investigation and the administrator was forced to resign, at which point, given his age, he retired from professional life. This former administrator has since passed away.

The fourth incident relates to reports of misconduct from the 1970s involving a long-time teacher and housemaster. A number of people interviewed alluded to secondhand information of a housemaster, who, in the words of one alumnus, engaged in an "abuse of power" and "sexual harassment." According to the reports, students who had broken a School rule could avoid detention or other discipline by agreeing to perform pushups fully unclothed, while the teacher in question watched. At the time, the administration conducted some level of review but it is not known whether any follow-up action was taken. The housemaster left Lawrenceville to pursue a second career and does not appear to have returned to teaching. As part of our due diligence process, counsel attempted to contact the former faculty member for comment, but received no reply.

We also learned of a small number of other incidents that involved (i) inappropriate comments by teachers to students, including comments regarding personal appearance and sexually explicit comments, and (ii) failure to maintain appropriate adult-student boundaries such as communicating personal information regarding the adult, or disregarding chaperone protocols. While these incidents crossed healthy teacher-student boundaries, none of them constituted serious sexual misconduct, and they were addressed by the School at the time of the conduct in several ways, which included counseling, training, meetings with deans or similar monitoring, and, in one instance, termination of employment.

These behaviors were all serious breaches of fundamental trust and of our duty of care. In each instance of misconduct of which we are aware, students reported the incident to a trusted adult shortly after the behavior occurred. <u>In other words, in these instances our students felt empowered to report the behavior as inappropriate, which enabled the School to address the conduct.</u>

Finally, as noted above, we recently learned that a former faculty member, Michael Reddy, who lived on our campus from 2013 to 2017, allegedly had sexual relations with a minor more than a decade ago before his time at Lawrenceville, and that his spouse, Alyssia Reddy, is alleged to have had an inappropriate and illegal relationship with a student from another school where she taught. Again, based on a review of their time here, we have no reason to believe they engaged in inappropriate behavior at Lawrenceville. I wrote to parents to advise them of the development and addressed our students on the matter at a special School meeting.

In assessing the nature of the various incidents, we gave considerable thought to whether we would disclose the names of the four former faculty members who we concluded had engaged in misconduct. Our primary consideration was whether we had any reason to believe that the individual posed an ongoing risk to students in our community, to students in another school or program, or to the public, where disclosure might mitigate that risk. We also took into account whether we possessed credible and corroborated evidence, a legal finding, or an admission of guilt; whether the disclosure might encourage a survivor to come forward; and whether the allegations had been made public already.

In the context of our review so far, none of the information we received and looked into met this criteria, with the exception of the Reddy matter. Additionally, when considering whether to name former faculty members, we sought to protect the privacy of the alumni/ae who were the victims of misconduct.

As we have expressed, we remain open to hear from members of our community with further information on any of the situations described above, or any other instances of misconduct that were not reported in response to my June letter, should they exist.

## **Current Programming and New Initiatives to Promote Self-Advocacy and Healthy Relationships**

In my <u>June 2016 letter</u>, I spoke about Lawrenceville's long-established culture of close, mentoring relationships between students and teachers in a residential context. In order to preserve and protect the many benefits our students derive from this culture, we strive to promote clear and healthy boundaries throughout the School. We also fundamentally believe that the School and our students are best served by seeking the truth if or when allegations come to our attention.

Throughout the course of our due diligence process, we spent considerable time assessing our current practices and policies; our training protocols; and our educational programs aimed at maintaining clear boundaries, encouraging self-advocacy, and ensuring the health and wellbeing of all members of our community. We reviewed all current policies and procedures related to the oversight of a residential environment, including background checks on all employees; range and frequency of training for the entire community on healthy adult-student relationships; and the efficacy of our approach to the anonymous reporting of incidents or problem behavior. We also reviewed the policies and procedures of some of our peer schools as an additional source of best practices among boarding schools.

Our review reaffirmed a number of strong policies and practices already in place, many of them rooted in our long-established House system, where teams of adults are trained as part of our residential program to be vigilant and to maintain a high degree of awareness of the general welfare of the students under their care.

In the context of this review, a number of the policies and programs stood out as especially impactful. In particular, our Personal Development Seminar (PDS), which is a required healthy living curriculum for both 2<sup>nd</sup> and 3<sup>rd</sup> Form students (freshmen and sophomores), covers a range of relevant topics. The topics include sexual consent and healthy relationships; hazing, harassment, and bullying; and self-advocacy and boundary training.

More recent initiatives include a School-wide and Board-level series of discussions that produced a new consent policy that is now fully incorporated into our PDS curriculum. The preamble of our policy in the School handbook captures the purpose behind articulating the guidelines, which is to "to instill in our students the confidence to advocate for themselves (and) the language to set clear boundaries" in all relationships.

We continue to regard the quality of residential programming as key to the safety and wellbeing of our students, and with this in mind, we are developing enhanced prefect training for next fall, especially in areas of mental health awareness, consent, and self-advocacy.

In addition to reinforcing our policy of background checks for all employees and adult family members living on campus, we now have a policy requiring background checks for parent volunteers and all outside contractors working on campus.

In order to further ease an individual's ability to report misconduct of any sort, we have established anonymous reporting systems hosted outside the School by third parties. Our students have access to our SafeSchools platform and adults have access to the Navex EthicsPoint incident management system, both of which are held to the strictest standards of confidentiality. Reports submitted through these platforms are routed to and evaluated by the director of human resources, dean of students, coordinator of risk policies and/or outside counsel, and given careful attention by the appropriate Lawrenceville School administrators.

Finally, we have established a full curriculum of enhanced training and information seminars for the entire School community that occur on a regular basis. We have set up age-appropriate sessions directed at various student groups and a series of required trainings for all faculty and staff that reinforce healthy relationships and the maintenance of clear boundaries. All of this, of course, is aimed at preserving and honoring the supportive mentoring between adults and students that has long characterized a Lawrenceville education.

## **Conclusion**

With a careful view of evolving best practices, we will continue to focus on the wellbeing of current and future students through programming, training, and counseling work. And we remain all the more dedicated to the important work that we do here at Lawrenceville: We instill confidence in adolescents, we encourage them to develop strong, ethical voices, and we send them out in the world to make an impact. Still, we are at a juncture where schools are being held

to account and being asked to take responsibility for past actions or inactions. Even schools committed to the highest standards and clear missions must acknowledge imperfections and seek to be better.

The increased scrutiny that the independent school world has recently undergone has caused an often painful, but fundamentally important reckoning, and the result is that today's standards of transparency and accountability have risen far above standards in past decades. While recalling past trauma, abuse, and neglect has been difficult for many communities, there is no alternative. We will continue to work to build the trust of our alumni/ae body so that we are even more confident that survivors, should they be out there, feel empowered to come forward to find healing or to help us hold ourselves accountable. As we receive new information, we will pursue the truth, wherever it leads us, and keep you informed.

For those seeking to contact us in reaction to this letter or with new information, please know that there are a number of options. Our highly confidential, anonymous reporting portal hosted by Navex is open to all members of the Lawrenceville community and can be accessed through the following link: <a href="https://secure.ethicspoint.com/domain/media/en/gui/48378/index.html">https://secure.ethicspoint.com/domain/media/en/gui/48378/index.html</a>. Erika Worthy, our director of human resources can be reached via email: <a href="https://eworthy@lawrenceville.org">eworthy@lawrenceville.org</a> or phone: 609-620-6114. And of course, for those wishing to contact me personally, I welcome your direct communication either through my office phone: 609-896-0408, or my email: <a href="headmaster@lawrenceville.org">headmaster@lawrenceville.org</a>. As we learn more and as the need arises, we will continue to report to the Lawrenceville community. Doing so with honesty and a clear sense of our fundamental responsibility is the only way forward.

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The Shelby Cullom Davis '26 Head Master

cc: Board of Trustees