

Milton Academy Program Assessment  
Final Report Volume I:  
Summary of Key Findings and  
Recommendations

April 13, 2018

Delivered by the  
Rape, Abuse & Incest National Network

*The information contained in this document is confidential and is intended solely for the use of the client to whom it is addressed.*

## EXECUTIVE SUMMARY

In Fall 2017, Milton Academy (Milton) contracted with the Rape, Abuse & Incest National Network (RAINN) to examine its sexual assault prevention and response mechanisms. The experts at RAINN utilized a victim-centered, trauma-informed approach to assess Milton's current prevention and response related to sexual assault on campus.

To ensure that all facets of Milton's sexual assault education and awareness, response, and compliance programs were assessed, RAINN followed a systematic and replicable methodology. First, RAINN reviewed Milton's policies, programs, procedures, services, trainings, and awareness materials. Next, RAINN conducted site visits with key personnel. Finally, RAINN analyzed the information gathered from both written materials and feedback from the site visits against proprietary program standards developed by RAINN. These program standards were created specifically for Institutes of Secondary Education (ISE) and include research-based best and promising practices in the areas of education, awareness, and response to sexual assault.

Overall, Milton's sexual assault prevention and response program meets many of the proprietary standards specific to ISE's. Notably, Milton has taken several commendable steps to address sexual assault on campus and has provided response capabilities for students and employees (e.g., faculty and staff). Among the most valuable of these steps were the following:

1. Identification of the senior team who have the primary responsibility for coordinating response efforts in the 2017-2018 school year;
2. Completion of investigations for all reports of sexual misconduct;
3. Requirement to include the Criminal Offender Record Information and, beginning in 2016, to include the Sex Offender Registry Information checks for all adults interacting with students on campus;
4. Development and facilitation of a strong and collaborative relationship with the Milton Police Department to assist in all instances of sexual misconduct.
5. Efforts to investigate historical cases of sexual misconduct and provide support for those affected; and
6. The removal of visual images and the changing of building names of individuals who have been accused of sexual misconduct.

In addition to key findings, detailed, concrete recommendations can be found throughout the RAINN report for improving Milton's sexual misconduct prevention and response program. RAINN would like to highlight the following recommendations, which we believe will have the greatest impact on the Milton community:

1. Develop, codify, and maintain formal policies and procedures for reporting, investigating, notifying, adjudicating, sanctioning, and appealing incidents of sexual misconduct for

students and employees in a standalone Sexual Misconduct Policy. Content should be specific to cases of sexual misconduct and grounded in victim-centered and trauma-informed best practices;

2. Provide all students, faculty, and staff with easy access to the policies and processes for reporting, investigating, and adjudicating incidents of sexual misconduct. Annually updated policies should be made available at the start of each school year, as well as electronically through the student and employee communication portals. All materials should be accessible and inclusive for Milton's diverse population;
3. Provide all students and employees with annual training on the updated Sexual Misconduct Policy and procedures. All materials related to prevention and response should be easily accessible to students and employees, and inclusive of Milton's diverse population;
4. Create a Sexual Assault Response Team (SART) to ensure a coordinated, comprehensive response for victims of sexual assault, with staff roles clearly defined. The team should include a Sexual Misconduct Prevention and Response Coordinator responsible for coordinating Milton's overall prevention and response efforts; a Sexual Misconduct Response Investigator to focus on executing an equitable and standardized investigation process; and a Victim Advocate to have someone assist the victim throughout the recovery process, especially to help with access to resources;
5. Create annual training, and provide to members of the SART, that is based in a victim-centered and trauma-informed model. Include clear policies and protocols for the response and investigation process, on- and off-campus support services for student and employee victims, mandatory reporting requirements, and the possible role and collaboration with the Milton Police Department and a local sexual assault service provider;
6. Expand on the yearly annual training provide to all staff that includes student and employee policies and protocols for (1) reporting, (2) investigating, (3) sanctioning, and (4) appealing outcomes for incidents of sexual misconduct; and
7. Develop and execute a memorandum of understanding with local sexual assault service providers, police departments, and medical facilities that conduct sexual assault medical forensic examinations for minors and adults.

RAINN encourages Milton to apply the recommendations set forth in its report. Paradoxically, Milton may experience an increased number of reported incidents of sexual violence following its implementation of these recommendations. If it does, RAINN urges Milton not to assume that this is indicative of an increase in assaults. More likely, it would correspond to increased trust in the Milton process, administration, and community. Encouraging a greater percentage of victims to report their assaults should be a core goal of Milton's programming.

Of note, there have been numerous reports of educator sexual misconduct as well as student-to-student sexual misconduct across the country, both in recent and the more distant past.<sup>1</sup> Improving safety and monitoring in schools has shown to decrease perpetration and victimization.<sup>2</sup> However, there is still no comprehensive national database to track sexual misconduct statistics for ISE to address the unique set of challenges sexual misconduct presents to boarding and day schools.

Likewise, given the inherent difficulty of measuring sexual misconduct, it is impossible to know exactly how often incidents occur at Milton. The January 2017 *White House Task Force Report to Protect Students from Sexual Assault*, which specifically addresses issues in secondary education, reports that only seven percent of victims reported to school authorities.<sup>3</sup> However, there is some data available about the national prevalence of this issue. According to the *Youth Risk Behavior Surveillance Survey*, which assesses both private and public schools, of the 69.1 percent of students nationwide who dated or went out with someone during the 12-month period before the survey, 10.6 percent reported experiencing sexual dating violence. The number was higher among female students (15.6 percent) than among male students (5.4 percent).<sup>4</sup>

Throughout its report, RAINN has made many recommendations regarding how Milton can build and improve upon programs that prevent and respond to sexual violence. RAINN is confident in Milton's dedication to implementing the recommendations provided in its report and believe that this guidance will help Milton achieve its vision of providing best-in-class sexual assault education, awareness, and response programming.

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<sup>1</sup> RAINN's Demonstrated Experience. (n.d.). Retrieved October 17, 2017, from <https://www.rainn.org/rainn-demonstrated-experience>.

<sup>2</sup> See the Centers for Disease Control and Prevention. Division of Violence Prevention (n.d.). *Sexual Violence*. Retrieved March 22, 2017 from <https://www.cdc.gov/violenceprevention/>.

<sup>3</sup> The Second Report of the White House Task Force to Protect Students from Sexual Assault (2017, January 5). Retrieved from <https://www.whitehouse.gov/sites/whitehouse.gov/files/images/Documents/1.4.17.VAW%20Event.TF%20Report.PDF>.

<sup>4</sup> Kahn, L., McManus, T., Harris, W.A., et al. 2016. Youth Risk Behavior Surveillance – United States, 2015. *MMWR Surveillance Summaries*, 65, No. SS-6. Retrieved from [https://www.cdc.gov/healthyouth/data/yrbs/pdf/2015/ss6506\\_updated.pdf](https://www.cdc.gov/healthyouth/data/yrbs/pdf/2015/ss6506_updated.pdf).