



ANTI-HAZING POLICY

Effective Date: January 5, 2026

Responsible Office: Office of the Dean

Policy Last Revised: January 5, 2026

1. Policy Statement and Purpose

The American Film Institute Conservatory (the "Conservatory") strictly prohibits hazing in all forms. Hazing undermines individual safety, dignity, and access to education and is inconsistent with the Conservatory's academic mission and values. The Conservatory adopts this policy to comply with all applicable federal and state laws, including the Stop Campus Hazing Act, and other Conservatory policies. This anti-hazing policy establishes definitions, prohibited conduct, reporting options, response procedures, transparency requirements, and prevention education.

2. Definitions

a. Hazing

Hazing means any intentional, knowing, or reckless act committed by a person (individually or with others) against another person regardless of their willingness to participate that:

- i. is committed in the course of an initiation into, affiliation with, or maintenance of membership in a student (or "Fellow") organization; and
- ii. causes or creates a risk, above the reasonable risk encountered in ordinary participation in the Conservatory or the organization (e.g., the physical preparation necessary for production activities), of physical or psychological injury, including but not limited to:
 - whipping, beating, striking, electronic shocking, placing harmful substances on the body, or similar activity;
 - causing, coercing, or inducing sleep deprivation, exposure to the elements, confinement, extreme calisthenics, or similar activity;
 - causing, coercing, or inducing another person to consume food, liquid, alcohol, drugs, or other substances;
 - causing, coercing, or inducing sexual acts;
 - any activity that places another in reasonable fear of bodily harm through threatening words or conduct;
 - any activity that includes or requires a criminal violation of local, state, or federal law.

Consent is not a defense. A person's willingness to participate in a hazing activity does not excuse hazing.

b. Fellow Organizations

Any organization at the Conservatory (e.g., club, society, association) with two or more members who are Fellows, whether or not officially recognized by the Conservatory.

c. Related Terms

- i. **Organizational Hazing:** Hazing that is planned, promoted, facilitated, or condoned by an organization or its members.
- ii. **Aggravated Hazing:** Hazing resulting in serious bodily injury or death, or involving coercive alcohol/drug consumption.
- iii. **Retaliation:** Any adverse action (threats, intimidation, harassment, doxxing, social ostracism, adverse academic or employment action) against a person for reporting hazing or participating in a process.
- iv. **Complainant/Reporter:** Any person who reports hazing, whether or not they are the person subjected to it.

d. Exclusions

This policy does not prohibit reasonable and customary social or similar training, contests, competitions, or events that do not create risks or harms described above and are not connected to initiation, affiliation, or other types of membership conditioning.

3. Scope and Jurisdiction

This policy applies to conduct by AFI employees, Fellows, and Fellow organizations on or off campus, including in digital and online spaces, travel (e.g., festivals, off-site filming locations), and locations affiliated with the Conservatory. It applies to recognized and unrecognized organizations, and to prospective and former Fellows when conduct relates to a Conservatory organization.

4. Prohibited Conduct

It is a policy violation to plan, direct, facilitate, encourage, permit, or participate in any hazing conduct, including:

- a. **Physical brutality or endangerment:** Striking, paddling, branding, electronic shocks, forced calisthenics, exposure to extreme weather; applying harmful substances; confinement; denying reasonably necessary medical care.
- b. **Coerced consumption:** Requiring or pressuring consumption of alcohol, controlled substances, excessive food/liquid, or non-food substances; drinking games tied to initiation or status.
- c. **Psychological harm or humiliation:** Acts reasonably expected to cause humiliation, degradation, severe embarrassment, social isolation, or mental distress; compelled silence; coerced servitude or errands (“line-ups,” “hell week”).
- d. **Sexual misconduct:** Coerced nudity or sexual acts; sexualized tasks or performances.

- e. **Threats or intimidation:** Activities placing others in reasonable fear of bodily harm; degrading or abusive verbal conduct.
- f. **Compelled unlawful acts:** Vandalism, theft, trespass, providing alcohol to minors, or any act requiring a criminal violation.
- g. **Implicit/explicit quid pro quo:** Conditioning membership, roles, leadership positions, benefits, gear, travel, or playing time on participation in prohibited activities.
- h. **Failure to act:** Knowingly failing to report hazing; knowingly allowing an environment where hazing occurs; or directing others to remain silent.
- i. **Retaliation** against any party or witness; interference with an investigation (coaching statements, destroying evidence, group chats to coordinate stories).

Organizational traditions, “inside jokes,” or “group bonding” do not excuse conduct that meets the definition of hazing.

5. Reporting Options

In cases of emergencies, 9-1-1 should always be called first. In non-emergency cases, any person (Fellows, Faculty, Staff, alumni, community members) may report hazing to any of the following sources:

- **Campus Security:** 323.856.7600 or Security@afi.com
- **Office of Fellow Affairs:** 323.856.7802 or FellowAffairs@afi.edu
- **Anonymous Reporting Inbox:** opentalk@afi.com

a. Good-Faith Amnesty

To remove barriers to help seeking, the Conservatory may offer amnesty from disciplinary action for certain lesser violations (e.g., personal alcohol use) to Fellows who in good faith seek medical assistance, report hazing, or cooperate in investigations. Amnesty does not bar educational or remedial measures and does not preclude criminal/civil liability.

b. Confidentiality and Privacy

The Conservatory will protect privacy consistent with legal obligations. Personally identifiable Fellow information will not be included in the Conservatory’s public Campus Hazing Transparency Report. FERPA applies.

6. Conservatory Response and Procedures

a. Intake, Support, and Interim Measures

Upon receipt of a report, the Conservatory will promptly:

- Acknowledge the report and offer resources, including medical care, counseling, academic support, and safety planning.
- Assess immediate safety risks and implement interim measures (e.g., interim suspension of activities, no contact directives, practice/game restrictions, event holds, facility access limits).
- Determine appropriate process (Fellow conduct, Title IX/sexual misconduct, HR for employee only matters) and coordinate among offices as needed.

b. Investigation

The Associate Dean, Fellow & Alumni Affairs (or the Associate Dean's designee) and/or a representative from the AFI Human Resources will review all hazing reports and determine the appropriate investigator, depending on the individuals involved. When reports involve potential violations of multiple policies (e.g., Title IX, Discrimination, civil rights), the institution will coordinate between the relevant offices to ensure appropriate and legally compliant handling of the case. Hazing investigations may be paused for, or proceed concurrently with, other investigations. Hazing investigations will, to the extent possible, be concluded within 90 days of the receipt of a report or complaint.

Depending on the alleged parties involved, the matter may be referred to an appropriate forum for formal review and adjudication. The reviewing body will follow the institution's established conduct procedures, including due process protections for all parties involved.

The standard of review for non-Title IX investigations is preponderance of the evidence.

Non-Title IX investigative steps may include:

- Contacting individuals accused of hazing and notifying relevant organizational leaders;
- Interviewing victims, witnesses, and any accused individual(s);
- Imposing interim measures if necessary;
- Requiring individuals or groups to participate in investigatory meetings;
- Limiting communication or use of electronic devices during the investigation; and
- With voluntary consent, requesting physical examinations if allegations include physical abuse (medical findings will be summarized for the investigator, in compliance with privacy laws).

Upon conclusion of an investigation, a written report will be submitted to the Associate Dean, Fellow & Alumni Affairs. If warranted, charges will be issued in accordance with the Fellow Code of Conduct. A finding of responsibility will also be determined through the investigation process. Determinations of responsibility (e.g., individual vs. organizational) will consider:

- Number of members involved or aware of the violation;
- Knowledge and actions of officers/leaders/advisors;
- Whether members acted in concert or under organizational influence;
- Connection to an organizationally sponsored or endorsed event; and
- Presence of a pattern of past violations without organizational intervention.

c. Findings and Sanctions

Both individual and organizational responsibility, or both, may be found. Factors may include: number of members involved or aware; knowledge and actions of officers, captains, advisors, or coaches; whether members acted in concert or under organizational influence; connection to organizationally sponsored/endorsed events; patterns of past violations.

Potential sanctions and remedies include, but are not limited to, the following:

- **Individuals:** education, reflection assignments, probation, loss of privileges/eligibility, suspension, expulsion.
- **Organizations (including athletic teams):** training and reform plans; probation; restrictions on recruitment, events, travel, practices, competitions; loss of housing or facility access; suspension; revocation of recognition or season cancellation.
- **Employees/Volunteers:** corrective action up to termination or removal of roles, pursuant to employment policies and contracts.

Additional remedies may include restitution, community service, additional educational training, mandated prevention programming, and more, at the discretion of the institution.

d. Appeals

Parties may appeal findings/sanctions based on material procedural error, new evidence, or disproportionate sanction, pursuant to the Fellow Conduct Code or applicable procedures.

e. Retaliation and False Reports

Retaliation is strictly prohibited and will result in separate discipline. Intentionally false or bad-faith reports may also violate Conservatory policy.

7. Education, Prevention and Culture Change

The Conservatory will maintain research-informed, campus-wide prevention and awareness programs designed to reach Fellows, Staff, and Faculty. Programming includes:

- Primary prevention strategies (e.g., bystander intervention, ethical leadership, team culture building without hazing).
- Annual distribution of this policy to all Fellows and employees; targeted training for organization leaders, advisors, coaches, and new members.
- Orientation modules for incoming Fellows; annual refreshers for returning Fellows; specialized training for high-risk contexts, if any.

California state law requirements (Educ. Code 66308(b)):

- Beginning January 1, 2026, hazing prevention and outreach will include (at minimum):
(i) hazing awareness and prevention and the [Conservatory's] prohibition policy; (ii)

how to report hazing to campus personnel, including anonymous reporting; and (iii) bystander intervention training.

- The prevention and outreach program will be part of every incoming [Fellow]’s orientation and will be offered annually to athletic teams and affiliated fraternities and sororities, [if any].

8. Transparency and Federal Reporting

a. Annual Security Report (“ASR”)

The Conservatory will collect and disclose statistics on hazing incidents reported to campus security authorities or local police in the Annual Security Report (“ASR”) published each year, consistent with federal law.

b. Campus Hazing Transparency Report (“CHTR”)

The Conservatory will maintain a Campus Hazing Transparency Report (“CHTR”) on a prominent location of its public website. The CHTR will:

- Summarize findings of responsibility for hazing violations by recognized student organizations (name of organization; general description of the violation including whether alcohol/drugs were involved; [Conservatory] findings and sanctions; and the dates of (a) the alleged incident, (b) investigation initiation, (c) conclusion with a finding, and (d) notice to the organization).
- Be updated at least twice per year (e.g., January and July) when new findings of responsibility exist.
- Retain each update for 5 calendar years from the date of publication.
- Exclude personally identifiable information about individual [Fellows].
- Link to the ASR hazing statistics and to this policy; include information about applicable local and state laws.
- Note that if there are no findings during an update period, the [Conservatory] may note this and is not required to publish an update for that period.

c. California State Reporting (Educ. Code 66309)

If the Conservatory is an independent “qualifying institution” (as defined in Educ. Code § 69432.7(l)), on or before June 30, 2026, and on or before June 30 each year thereafter, the Conservatory will report to the appropriate policy committees of the Legislature the number of hazing incidents that constituted a violation of this policy and whether each violation was affiliated with a [Fellow] organization. Reports will be disaggregated by campus (if applicable) and will comply with FERPA and other privacy laws.

9. Records and Data

The Conservatory will maintain investigation and disciplinary records as required by law and policy. CHTR entries will be preserved consistent with Section 8(b) above. Case files will be retained in accordance with the Conservatory's records retention schedule and FERPA obligations.

10. Relationship to Other Policies and Laws

This policy supplements, and does not limit, other Conservatory policies (e.g., Fellow Code of Conduct; Alcohol and Drug Policy; Title IX/Sexual Misconduct; Anti-Hazing State Law; Anti-Bullying/Harassment). Conduct may violate multiple policies and laws simultaneously.

Nothing in this policy limits First Amendment protections or due process rights as provided by law.

11. Policy Review

This policy will be reviewed annually by the Office of the Dean (in consultation with legal counsel) to ensure alignment with evolving federal/state requirements and best practices.

12. California Civil Liability and Rebuttable Presumption (Educ. Code 66308)

Beginning January 1, 2026, individuals injured by hazing may bring a civil action, and (under specified conditions) may bring an action against an educational institution. There is a rebuttable presumption that the [Conservatory] took reasonable steps to prevent hazing if the [Conservatory] maintains all of the following:

- Rules for students prohibiting hazing, allowing anonymous reporting, and providing disciplinary actions for violations; and procedures to inform all students of those rules and penalties (and any revisions).
- Rules for employees prohibiting hazing and providing disciplinary actions for violations; and procedures to inform all employees of those rules and penalties (and any revisions).
- A comprehensive prevention and outreach program addressing hazing that (a) covers hazing awareness/prevention, reporting (including anonymous options), and bystander intervention; (b) is included in incoming [Fellow] orientation; and (c) is offered annually to athletic teams and affiliated fraternities and sororities [if any].

13. California Criminal Law (Penal Code 245.6)

Hazing is a crime in California. A violation not resulting in serious bodily injury is a misdemeanor punishable by up to one year in county jail and/or fines of \$100 - \$5,000. If hazing results in death or serious bodily injury, it is a wobbler (misdemeanor or felony). Penal

Code § 245.6(e) also authorizes civil suits against participating individuals and organizations whose agents authorized, requested, commanded, participated in, or ratified the hazing.

Consistent with AFI and Conservatory policy and applicable law, the Conservatory will promptly notify or coordinate with law enforcement where reports indicate serious bodily injury, death, or other potential felony conduct, or where otherwise required.