

Hazing Policy

Division Responsible: Division of Finance & Operations

Office Responsible: People Operations

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Introduction/Background Information:

This policy outlines prohibited behaviors related to hazing, reporting requirements, investigation procedures, and sanctions at Palo Alto University. It is intended to guide members of the PAU community, including students, faculty, staff, vendors, and volunteers, in preventing hazing and in responding to it when it occurs on or in relation to the University's campuses (all PAU locations), or off-campus locations where members of the community are engaged in University-affiliated activities.

This policy ensures compliance with the federal *Stop Campus Hazing Act* (Pub. L. No. 118-173, "SCHA"), which amends the Clery Act, 20 U.S.C. § 1092(f) and its implementing regulations at 34 C.F.R. § 668.46, and with California's hazing laws, including Penal Code § 245.6 ("Matt's Law") and Education Code §§ 66305 to 66309 (California's Stop Campus Hazing Act for higher education institutions).

This policy works together with, and does not replace, several other PAU policies: the [Title IX Policy](#) (for reports of sexual misconduct or gender-based discrimination), the [Alcohol and Drug Policy](#), the [Student Handbook](#) and [Employee Handbook](#) (for the applicable conduct and disciplinary process), and [PAU's Student Records / FERPA Policy](#) (for handling of investigation records). Where this policy and another PAU policy conflict on a procedural point, applicable federal and California law prevails. Any remaining procedural conflict will be resolved by the Director of Academic Integrity and Resolution and/or the Director of People Operations in consultation with Legal Counsel.

Scope:

This policy applies to all students (including prospective and former students), faculty, staff, vendors, volunteers, contractors, visitors, and any established, recognized, and registered campus departments, divisions, schools, and all student clubs and organizations, whether or not officially recognized. It applies at every PAU location and to conduct occurring off campus or online where it is connected to a PAU-affiliated individual, group, or activity. This policy also applies to Academic Groups (as defined below), including program cohorts, research labs and teams, practicum and clinical training settings (including PAU clinics), and consortium or partner programs, and to hazing committed by faculty, supervisors, or others in a position of authority over students.

De-recognition, disbanding, placement on inactive status, or a group's own description of itself as "unofficial" or "underground" does not remove the University's jurisdiction over hazing connected to that group's activities, membership practices, or history, including conduct carried out by alumni or former members purporting to act on the group's behalf.

Policy Statement:

Hazing is abusive, degrading, psychologically damaging, and may be life-threatening. Hazing in any form, including but not limited to acts committed by or against faculty, staff, vendors, volunteers, students, or minors, will not be tolerated at Palo Alto University, either on or off campus. This prohibition applies to all campus departments, divisions, and programs, and to established, recognized, or registered student organizations and Academic Groups.

Definitions:

Hazing - Occurs when a person intentionally, knowingly, or recklessly, for the purpose of initiating, admitting, or affiliating an individual into or with a Student Organization or Academic Group, or for continuing or enhancing an individual's membership, office, or status in such an organization or group, causes, coerces, or forces the individual to do the following (regardless of their willingness to participate):

- Violate federal, state, tribal, or municipal law, or University policy or procedure;
- Consume any food, liquid, alcoholic beverage, drug, or other substance which subjects the individual to a risk of emotional or physical harm or renders them incapacitated;
- Endure brutality of a physical nature which causes or creates a risk above the reasonable risk encountered in the course of participation in the institution or the organization
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- Participate in or endure any activity that places another person in reasonable fear of bodily harm through threatening words or conduct;
- Endure any act against them that constitutes a criminal violation of federal, state, tribal, or local law;
- Incur unreasonable expenses, or provide money, goods, or services to other members, as a condition of membership or status (financial hazing);
- Perform personal errands, servitude, or uncompensated work unrelated to legitimate educational, research, or clinical training duties, or endure conduct designed to interfere with their academic, research, or clinical training progress; and
- Endure any other activity that creates a reasonable likelihood of bodily injury.

Consent is not a defense. Consent, real or perceived; the fact that the individual initiated or volunteered for the activity; the fact that the activity was consistent with organizational tradition; and the fact that no injury actually resulted, are not defenses to a violation of this policy.

Complicity. Soliciting, encouraging, aiding, or assisting another person in hazing; knowingly permitting hazing by a person or group under one's supervision or leadership; or having firsthand knowledge of hazing and failing to report it, also violates this policy. Apathy or acquiescence in the presence of hazing is not a neutral act.

Federal Hazing Definition - For purposes of Clery Act statistics and the Campus Hazing Transparency Report, PAU uses the definition at 20 U.S.C. § 1092(f)(6)(A): any intentional, knowing, or reckless act committed by a person (whether individually or in concert with other persons) against another person or

persons, regardless of the willingness of such other person or persons to participate, that (1) is committed in the course of an initiation into, an affiliation with, or the maintenance of membership in, a student organization, and (2) causes or creates a risk, above the reasonable risk encountered in the course of participation in the institution or the organization, of physical or psychological injury, including the acts listed in that statute.

California Hazing Definition - For purposes of the annual report to the Legislature under Education Code § 66309, PAU uses the definition in Education Code § 66306(c): any method of initiation or preinitiation into an affiliated student organization or student body which the initiator knows or should have known is likely to cause serious bodily injury to any former, current, or prospective student.

Application of Definitions - Conduct that meets the Federal or California Hazing Definition also violates this policy. The PAU definition of Hazing above is broader than both and is the standard used to determine responsibility under this policy.

Reckless / Recklessly - Acting with conscious disregard of a substantial risk that the conduct will cause physical or psychological harm to another person.

Aggravated Hazing - Hazing that results in serious bodily injury or death to a minor or student, where the individual responsible acted with reckless indifference to the victim's health and safety, or caused, coerced, or forced the consumption of alcohol or drugs by the victim. "Serious bodily injury" has the meaning given in California Penal Code § 243(f)(4).

Organizational Hazing - Hazing that an established, recognized, or registered Student Organization intentionally, knowingly, or recklessly promotes or facilitates.

Student Organization - Any organization at PAU in which two or more members are enrolled students, including a club, association, or student government, regardless of whether the organization is officially recognized by the University.

Academic Group - Any PAU program cohort, class, research lab or team, practicum or clinical training site or team, or consortium or partner program in which two or more members are PAU students, including groups led or supervised by faculty or staff.

Student - Any individual who attends, has applied to attend, has been admitted to PAU, or is enrolled in any PAU course.

Minor - Any person under the age of eighteen (18), regardless of student status.

Employee - Any person employed by Palo Alto University.

Vendor - Any individual, contractor, or external company representative who sells goods or provides services to the PAU community, including food service, maintenance, technology support, or others performing work on behalf of or in partnership with the University.

Alumni - Any former student who attended or graduated from PAU who returns and engages with an established, recognized, or registered group on campus and is named in a hazing report.

Amnesty - A limited exemption from disciplinary action by the University, granted to individuals who report hazing, seek emergency assistance, or cooperate in an investigation, even if they were involved in policy violations (e.g., underage drinking, hazing participation). The goal is to encourage reporting and timely intervention without fear of punishment. Whether a student's cooperation renders them eligible for amnesty under this policy is a final determination made by the University, at its sole discretion, following a review of the totality of the circumstances.

Campus Security Authority (CSA) - An official designated under the Clery Act (34 C.F.R. § 668.46) with significant responsibility for student and campus activities, who must report hazing and other Clery-reportable conduct disclosed to them for inclusion in PAU's Annual Security Report.

Preponderance of the Evidence - The standard of proof used under this policy: whether it is more likely than not that the conduct prohibited by this policy occurred. All proceedings under this policy will be prompt, fair, impartial, and conducted by those who are adequately trained.

Retaliation - Any adverse action, or attempt or threat to take adverse action, against a person because that person reported hazing in good faith, sought emergency assistance, or participated (or declined to participate) in a hazing-related process, whether the adverse action is directed at that person individually or at an organization or group with which they are affiliated.

Reporting:

Reporting: Any person with knowledge of conduct that may constitute hazing is encouraged to report it promptly through any of the following channels: [PAU's General Incident Report form](#), available on the How to Report Concerns to the University page of the Student Handbook (note: this form allows for anonymous submission for individuals who do not wish to disclose their identity); email to the Director of Academic Integrity and Resolution and/or the Director of People Operations; or local law enforcement. Anonymous reports will be reviewed, although PAU's ability to investigate may be limited by the information provided. Online and distance students may use any of these options. There is no time limit for reporting, but a prompt report allows a more effective response. Anyone who believes a person is in immediate danger should call 911.

Faculty, staff, and administrators of Palo Alto University are considered "responsible" individuals for purposes of this policy. This means they have an obligation to report anything they are told about potential hazing to the Director of Academic Integrity and Resolution and/or the Director of People Operations. Employees who knowingly fail to report may be subject to disciplinary action.

Investigation: Upon receiving a report, the Director of Academic Integrity and Resolution (for a report involving a student or student organization) and/or the Director of People Operations (for a report involving faculty, staff or vendors) will review the report to determine whether there is sufficient evidence to proceed, consistent with PAU's evidentiary review process described in the Student Handbook. A report involving a faculty respondent will be coordinated with the Director of Academic Integrity and Resolution and/or the Director of People Operations.

This review may include reaching out to the reporting party for clarification, interviewing witnesses and the accused, and, where the report involves a student organization, notifying relevant organizational leaders. Interim measures may be imposed at any point during this process, as described below.

A hazing investigation involving a student follows the timelines set out in the Student Handbook's conduct process

A hazing investigation involving a student organization, faculty member, employee, or vendor will proceed as promptly as reasonably possible given the number of individuals involved and the complexity of the case, and may be paused for, or proceed concurrently with, another investigation, for example, a Title IX investigation.

Determination of individual versus organizational responsibility will consider the number of members involved or aware of the violation, the knowledge and actions of officers, leaders, or advisors, whether members acted in concert or under organizational influence, the connection to an organizationally sponsored or endorsed event, and any pattern of past violations without organizational intervention.

Adjudication and Appeal:

For a report involving a student or student organization, adjudication and appeal follow PAU's student conduct process as described in the Student Handbook, including the sections on Adjudication of University-Level Student Conduct Reports, the PAU Student Conduct Board, and Appeal Requests.

For a report involving a faculty member, employee or vendor, adjudication is conducted by the Director of People Operations , and any resulting appeal follows the grievance or appeal procedure in the Faculty Handbook and/or Employee Handbook.

Where an allegation also involves conduct covered by the Clery Act's VAWA provisions (dating violence, domestic violence, sexual assault, or stalking, see 34 C.F.R. § 668.46(k)), the reporting party will receive the same procedural protections as the responding party, regardless of which process above applies, including an equal opportunity for an advisor of choice, simultaneous written notice of the outcome, and equal appeal rights.

Interim Measures: At any point after a report is received and before an investigation concludes, the Director of Academic Integrity and Resolution (for students or organizations) or the Director of People Operations (for faculty members, employees, or vendors) may impose interim measures reasonably necessary to protect the safety and well-being of any individual or the University community, or to preserve the integrity of the investigation.

Interim measures may include, but are not limited to:

- no-contact orders
- class schedule changes
- changes to campus employment
- rescheduling of exams or assignments
- a voluntary leave of absence
- escort service
- interim suspension of an individual
- interim suspension of an organization's recognition or activities
- account holds
- and denial of access to specific campus areas or facilities.

Interim measures are not a finding of responsibility and will be no more restrictive than reasonably necessary. A student, student organization, faculty member, employee, or vendor subject to an interim suspension may request prompt review of that decision by the Provost or a Vice President designee who was not involved in the original decision.

Amnesty: PAU recognizes that students are sometimes reluctant to report hazing activity due to fear of consequences for their own conduct. A student who acts in good faith to report activity that may fall within the definition of hazing, a student who seeks emergency medical or safety assistance for a person in need, and/or a victim who cooperates fully as a witness in the investigation and disciplinary process, will generally not be subject to student conduct sanctions related to their own behavior, as determined by the University in its sole discretion.

If evidence is later presented that a student granted amnesty continued to engage in hazing behavior, or had knowledge of hazing activity that was not reported, that student may be held accountable for the earlier behavior.

A student granted amnesty may still be subject to non-disciplinary action related to the incident. Amnesty does not provide immunity from criminal or civil liability, nor does it prevent referral to law enforcement when required by law. Amnesty is not available to a person who organized, led, or directed the hazing activity.

Sanctions: Violations of this policy will be sanctioned according to existing University policies found in the PAU Student Handbook, Employee Handbook, or Faculty Handbook.

Sanctioning decisions will consider aggravating factors (for example, aggravated hazing, involvement of alcohol or drugs, targeting of a minor, organizational leadership involvement, prior violations, or retaliation against a reporter) and mitigating factors (for example, self-reporting, good-faith cooperation, and the amnesty provisions above).

For individuals, sanctions may include disciplinary action up to suspension or expulsion.

For organizations, sanctions may include loss of registration, event-hosting privileges, access to facilities, or formal representation of the University.

For faculty members, employees, or vendors, sanctions may include disciplinary action up to and including termination of employment or revocation of campus access, consistent with University employment policies and applicable contracts.

For alumni, sanctions may include temporary or permanent loss of privilege to participate in designated activities, or a temporary or permanent ban from campus.

Sanctions may be applied in addition to any penalties under other applicable University policies, as well as civil or criminal penalties.

Retaliation: Retaliation for reporting hazing, or for cooperating in an investigation related to a hazing incident (including making a report or complaint, testifying, or assisting, participating in, or refusing to participate in an investigation), is strictly prohibited. Retaliation includes, but is not limited to:

- Threats, verbal or implied;

- Harassment or intimidation;
- Physical or psychological abuse;
- Social isolation; or
- Any conduct intended to create a hostile environment.

Complaints regarding retaliation may be filed using PAU's General Incident Report form, or by contacting the Director of Academic Integrity and Resolution and/or the Director of People Operations directly.

Records & Privacy: Hazing investigation records involving students are education records governed by the Family Educational Rights and Privacy Act (FERPA), and will be accessed, disclosed, and retained consistent with PAU's Student Records / FERPA Policy. Consistent with the Student Handbook's conduct-records retention practice, investigation files will be retained for at least five years, and records involving a suspension or dismissal will be retained indefinitely. Statistical reporting under this policy will not include personally identifiable information about any individual, consistent with PAU's Clery Act recordkeeping and Annual Security Report obligations.

Reporting Requirements:

Annual Security Report (ASR) Inclusion: In compliance with the federal Stop Campus Hazing Act, PAU will include hazing statistics in its Annual Security Report. This data will reflect all hazing incidents reported to Campus Security Authorities or local law enforcement, counted using the Federal Hazing Definition, beginning with the ASR due October 1, 2026 (covering calendar year 2025). The ASR will also include this policy's statement on hazing, how to report hazing, how reports are investigated, applicable federal and California laws, and a description of PAU's hazing prevention and awareness programs.

Campus Hazing Transparency Report: PAU will maintain and publicly post a Campus Hazing Transparency Report summarizing the names of student organizations found responsible for hazing; a general description of each violation, including whether it involved the abuse or illegal use of alcohol or drugs; and the date(s) of the incident, investigation initiation, investigation conclusion, any sanctions imposed, and notification to the organization, as applicable.

Consistent with federal requirements, this report will not include personally identifiable information about any individual. The report will be updated at least twice per year (on or before January 1 and August 1 of each year), will remain publicly accessible for at least five years after posting, and will be published in a prominent location on PAU's website.

California State Reporting: PAU will report hazing incident information to the appropriate policy committees of the California Legislature as required by California Education Code § 66309, to the extent that provision applies to PAU, on or before June 30 of each year. Responsibility for confirming applicability and filing this report rests with the Director of Academic Integrity and Resolution and/or the Director of People Operations, in consultation with Legal Counsel. For this report, PAU uses the California Hazing Definition, under which reportable student organizations are limited to conference-based competitive programs and chartered fraternities and sororities.

Prevention and Awareness: PAU's hazing prevention and awareness program is being established alongside this policy. At minimum, it will include: distribution of this policy, including what constitutes

hazing, how to report it (including anonymously), and the consequences of a violation, to all students and employees upon publication and at least annually thereafter; inclusion of hazing awareness content in new-student orientation; and notice to employees of their reporting obligation under this policy at the time of hire. The Director of Academic Integrity and Resolution (or designee) is responsible for maintaining this program for students, and the Director of People Operations is responsible for maintaining this program for Faculty and Employees.