

# **ANTI-HAZING POLICY**

## **I. PURPOSE**

The purpose of the Anti-Hazing Policy is to prohibit hazing in all forms, ensure compliance with the Stop Campus Hazing Act (SCHA) Amendments to the Clery Act, and promote a safe and respectful campus environment. Hazing undermines the integrity of student life, endangers individuals, and is inconsistent with Saint Elizabeth University's mission, vision, and values.

### **A. SCOPE AND APPLICABILITY**

This policy applies to all students, faculty, staff, administrators, recognized organizations, established groups, and third parties on or off campus (including online), including visitors, alumni, guests, representatives, and employees alleged to be engaged in activities related to vendors of Saint Elizabeth University. Any employees allegedly engaged in a hazing process against students will be referred to the appropriate institutional policies and procedures.

Saint Elizabeth University's prohibition on hazing extends to all aspects of its educational programs and activities, including, but not limited to, admissions, employment, academics, athletics, and student services.

This policy was written to comply with all applicable federal and state laws and regulations. Starting January 1, 2025, institutions must begin collecting and retaining data on any hazing incidents reported for inclusion in Clery Reports, which are due by October 1 for each academic year. One year after the act is enacted (July 2025), Saint Elizabeth University must publish a new report titled "Campus Hazing Transparency Report" twice a year that will disclose each incident for which a finding of responsibility for hazing was issued against a student organization that Saint Elizabeth University officially recognizes.

The "Campus Hazing Transparency Report" must identify the student organization and describe the incident, including the date and timeline of the investigation. It must also confirm that the institution notified the organization of its findings, but must not include personally identifying information about any student.

### **B. RESPONSIBLE AUTHORITY**

Dean of Student Affairs, Dr. David Hill (Office 218, Santa Rita, [dhill@steu.edu](mailto:dhill@steu.edu), 973-290-4318), Title IX Coordinator. Dr. Joseph Ciccone (Office 10 G, Santa Maria, [jciccone@steu.edu](mailto:jciccone@steu.edu) 973-290-4383), Director of Security, George Petersen (Office 12, Santa Rita, [gpetersen@steu.edu](mailto:gpetersen@steu.edu) 973-290-4290)

### **C. WHAT IS PROHIBITED BY THIS POLICY**

The Stop Campus Hazing Act (SCHA) defines hazing as any intentional, knowing, or reckless act, regardless of a person's willingness to participate, committed against a student in the context of an initiation or affiliation with a student organization that causes or creates a substantial risk of physical or psychological injury. This includes the following acts.

1. Is committed during an initiation into, an affiliation with, or the maintenance of Membership in a student organization.
2. Causes or is likely to contribute to a substantial risk, above the reasonable risk encountered in the course of participation in the institution of higher education or the organization (such as the physical training necessary for participation in an athletic team), of physical injury or psychological injury, including:
3. Whipping, beating, striking, electrocuting, applying a harmful substance to someone's body, or similar activities
4. Causing, coercing, or otherwise inducing sleep deprivation, exposure to the elements, confinement in a small space, extreme calisthenics, or other similar activity,
5. Causing, coercing, or otherwise inducing another person to consume food, liquid, alcohol, drugs, or other substances.
6. Causing, coercing, or otherwise including another person to perform sexual acts,
7. Any activity that places another person in reasonable fear of bodily harm through the use of threatening words or conduct.
8. Any activity against another person that includes a criminal violation of local, State, or Federal law.
9. Any activity that induces, causes, or requires another person to perform a duty or task that involves a criminal violation of local, State, or Federal law.

**Hazing shall not include any reasonable and customary athletic, law enforcement, or military training; contests; competitions; or events.**

The following are examples, but not an inclusive list:

Requesting and/or requiring any member, regardless of status within the organization, to (or attempt to):

- Engage in public stunts or jokes
- Participate in morally degrading or humiliating games and/or activities
- Paddling in any form
- Having items thrown (i.e., water, paint, food) at any individuals
- Forced consumption of food or liquids, including alcoholic beverages, or use of illegal substances
- Request or compel attendance at unannounced events and outings
- Participate in pranks or other actions intended to harass any organization member, another organization, or any Saint Elizabeth University community member.
- Call any members degrading names that may cause embarrassment or ridicule

- Demean any member
- Cause physical or psychological harm to any members
- Restrict or disrupt the sleep of any member at any time (including sleep deprivation)
- Not permitting adequate time for studies
- Commit any violation of the Student Code of Conduct, federal, state, or local law as they pertain to hazing

#### **D. Organization**

An organization at an institution of higher education (such as a club, society, association, varsity or junior varsity athletic team, club sports team, fraternity, sorority, band, or student government) in which two or more of the members are students enrolled at the institution of higher education, whether or not the organization is established or recognized by the institution.

*All executive officers of organizations and new members/intake educators are responsible and liable for educating organizations and new members about the policy and consequences of hazing.*

#### **D. FEDERAL/STATE REPORTING REQUIREMENTS**

Beginning July 1, 2025, Saint Elizabeth University will publish a prominent location on our website.

## **II. DISCLOSURES/REPORTING**

Any person may disclose hazing to Saint Elizabeth University in the following ways:

**If this is an emergency, please immediately contact Security at 973-290-4090 or email the Associate Vice President of Student Affairs, Dr. David Hill, at [dhill@steu.edu](mailto:dhill@steu.edu).**

**The secure online report options should be utilized to submit information to Saint Elizabeth University, allowing us to investigate alleged violations of University Policy. Please use the appropriate application to report your concerns to the University. Furthermore, as you complete the form, please provide our office with as much detail as possible about the incident.**

The disclosing person does not need to be the harmed person and/or a Complainant. Saint Elizabeth University will review all disclosures to determine whether the conduct falls within the scope of this policy or other related policies.

An individual may pursue a Saint Elizabeth University response procedure independently of any off-campus processes, such as reporting to law enforcement or pursuing other non-campus-based civil reporting options. Saint Elizabeth University reserves the right to initiate this process even if law enforcement has declined to do so.

## A. Support Measures and Role of Confidential Employees

Physical resources, such as pamphlets and flyers on sexual harassment and assault awareness, bystander intervention, and risk reduction, can be found in the Counseling Center, Office of Human Resources, and the Office of the Dean of Student Affairs. Confidential employee means an employee of Saint Elizabeth University whose communications are privileged under Federal or State Law. The employee's confidential status only concerns information received while the employee is functioning within the scope of their duties to which privilege or confidentiality applies:

### Confidential Employees

Joseph Farias, University Chaplain, 973-290-4379, Annunciation Center, Upper Level  
[jfarias@steu.edu](mailto:jfarias@steu.edu)

Aaron Bianco, Campus Minister, 973-290-4240, Mahoney Library, Second Floor,  
[abianco@steu.edu](mailto:abianco@steu.edu)

Elizabeth Zappile, Mental Health Clinician, 973-290-4134 Founders Hall, Ground Floor,  
[ezappil@steu.edu](mailto:ezappil@steu.edu)

The university is committed to working with off-campus resources to offer specialized care to victims of sexual assault, violence, or hazing in a supportive environment. Florham Park police officers have been trained by advocates from the Morris County Sexual Assault Center on how to respond to victims of sexual misconduct and violence.

Individuals can choose to report incidents of sexual violence, domestic violence, dating violence, stalking, or hazing to the police by contacting the Florham Park Police: Emergency 911 or non-emergency (973) 377-2200. They can also contact Jersey Battered Women's Service (JBWS) for assistance with domestic abuse or violence through the confidential hotline at 1-877-R-U-ABUSED or for agency support at (973) 267-4763.

The Morris County Sexual Assault Center also offers the following services:

- **Sexual Assault Hotline:**  
(973) 829-0587 – confidential support and crisis counseling provided by a professional therapist, available 24 hours per day, 7 days per week.
- **Sexual Assault Response Team (SART):**  
An advocate-certified forensic nurse and specially trained law enforcement investigators address the medical, emotional, and legal needs of survivors 13 years of age and up who are in acute crisis and have been sexually assaulted within five days. Services are available through the Morris County Sexual Assault Center.

- Individual counseling and support groups are available to male and female survivors of sexual violence, as well as to their families and significant others.

JBWS is a full-service domestic violence and domestic abuse prevention agency offering:

- Confidential hotline: 1-877-R-U-ABUSED or agency support (973) 267-4763
- Emergency safe house for women and their children
- Counseling and legal assistance
- Children's services
- Transitional housing
- Life skills education/vocational counseling
- Community Education
- Teenage dating abuse prevention
- Primary prevention
- Friends and Family support
- Batterer's Intervention

Every victim has the option to seek treatment for injuries sustained during an incident of sexual misconduct or hazing, preventative care for sexually transmitted diseases, and other health services. Individuals can access this medical help by dialing 911, visiting Morristown Medical Center, calling the Morris County Sexual Assault Center at (973) 829-0587, or contacting Residence Life at (973) 985-7394.

#### Support Measures During the Process

All parties involved in the Title IX and Hazing process have the right to receive supportive measures from Saint Elizabeth University. Supportive measures are non-disciplinary and non-punitive.

As appropriate, supportive measures may include, but are not limited to:

- Counseling
- Education
- Extensions of deadlines or other course-related adjustments
- Modifications of work or class schedules
- Campus escort services
- Restrictions on contact between the parties (no contact orders)
- Changes in work or housing locations
- Leaves of absence

Increased security and monitoring of certain areas of the campus

**Note: Mental health professionals may be required to disclose information where there is an imminent threat of a person harming themselves or others.**

## **B. Anonymous Reporting**

Saint Elizabeth University is committed to reviewing all reports of hazing. Anonymous reports are accepted; however, Saint Elizabeth University's ability to obtain additional information may be compromised, and the ability to investigate anonymous reports may be limited.

## **C. PRIVACY**

The University will not disclose the identity of any individual involved in a disclosure, report, or resolution process under this policy, consistent with and except as may be permitted by the FERPA statute, 20 U.S.C. 1232g, or FERPA regulations, 34 CFR part 99, or as required by law, or to carry out the purposes of 34 CFR part 106, including the conduct of any investigation, hearing, or judicial proceeding arising thereunder.

## **D. FALSE REPORTS**

Saint Elizabeth University will not tolerate intentional false reporting of incidents. It is a violation of Saint Elizabeth University policies to make a false report of any policy violation intentionally, and it may also constitute a violation of state criminal statutes and civil defamation laws.

A. Upon receipt of a hazing report, Student Affairs staff may undertake an initial inquiry to obtain additional information. The initial inquiry may include:

1. Meeting with the reporting individual (s), if known, as well as any other relevant individuals, including advisors/coaches, to gather as much information as possible. Interviewees who are students at the University will be informed that the University Honor Code applies to their interview.

If meeting with a student who is alleged to have experienced hazing behavior, Student Affairs staff will discuss safety planning, how to request immediate accommodations (academic and/or personal), review possible interim protective measures and protections against retaliation, provide referrals to appropriate support resources, and encourage reporting to law enforcement. Staff will also provide a copy of these procedures.

2. Assessing whether any information in the report may implicate the University's Policy on Title IX or the University's Policy on Discrimination. If so, Student Affairs staff will notify the appropriate personnel immediately.

## **E. INTERIM MEASURES AND ACTIVITY RESTRICTIONS**

If the Respondent(s) creates a clear and substantial risk to persons or property at Saint Elizabeth University, the Responsible Administrator may issue an interim suspension or activity restriction at any point in the process, from the time a complaint is filed to the time the case is resolved. Ordinarily, a case involving an interim suspension will be expedited to resolution as quickly as possible.

The Responsible Administrator may also restrict or modify the activities (such as access to buildings or participation in activities) of the Respondent individual(s) or organization at any time from when a report is received until the matter is resolved. Activity restrictions may also remain in place after an outcome is decided.

Interim suspensions and activity restrictions are operative immediately upon receipt of the notice by the Respondent.

A complainant always has the right to seek a restraining order or a similar no-contact or protective order from the police. Contact Campus Security for assistance in obtaining protective orders from the police at the Florham Park Police Department, located at 111 Ridgedale Avenue, Florham Park, NJ 973-377-2200. Saint Elizabeth University will enforce all protective and restraining orders, regardless of who issues them. Enforcement of these orders will begin upon receipt of notification and documentation of their existence. Should either party wish to cooperate with local law enforcement in a criminal investigation, they may do so under the guidance of the appropriate legal authorities without fear of penalty by the University for violating the no-contact directive issued by the University.

## **III. EVALUATION PANEL**

Upon receiving a hazing report or completing an initial inquiry (depending on when the report is submitted), the Hazing Panel (hereinafter referred to as the Panel) will conduct a review. The Associate Vice President of Student Affairs will chair the Panel, which will consist of the following personnel: NCAA Compliance Coordinator, Athletic Director, Director of Student Engagement, and Chief Judicial Officer. The Panel will convene as soon as possible and typically within three business days of receiving a report. The following procedures are intended for hazing investigations that do not involve cross-jurisdictional matters related to Title IX or Human Resources. Cross-jurisdictional investigations will utilize agreed-upon procedures to apply the relevant University policies (Employee/Title IX). If a complaint is filed against a member of the Evaluation Panel and the actions or decisions are the basis of the report, the Responsible Administrator will designate an alternate to serve on the Panel.

### **A. Assessment of Actionability**

Based on the available information, the Panel will first determine whether the report is actionable under the University's Hazing Policy. An actionable report contains sufficient information to

appear valid or genuine (e.g., location, time, specific individual(s) or organization(s) involved, and/or specific observed behavior). It implicates one or more provisions of the University's Hazing Policy.

#### B. Assessment of Threat to Health or Safety

**Risk Factors.** If the report is deemed actionable, the Panel will next determine whether the reported information and any other available information provide a rational basis for concluding that there is a significant and articulable threat to the health or safety of any member of the University community. The Panel will make this determination based upon a review of the totality of the known circumstances, and will be guided by a consideration of the following (the Risk Factors):

- a. Whether the Respondent/Organization has a prior history of failing to comply with any University policies, including No Contact Directives, Standards of Conduct, and/or University protective measures.
- b. Whether the Respondent/Organization has threatened to commit violence.
- c. Whether the incident involved multiple individual respondents or organizations.
- d. Whether the reported behavior included physical activity (e.g., paddling, burning, branding, tattooing, forced calisthenics, coerced alcohol or drug consumption);
- e. Whether the reported behavior involved psychological hazing (e.g., acts which are likely to compromise an individual's dignity, cause an individual embarrassment or shame, or cause an individual to be the object of malicious amusement or ridicule);
- f. Whether the report reveals a pattern of alleged hazing behavior by the Respondent or Organization.
- g. Whether there are any injuries and/or other aggravating circumstances or signs of hazing behavior.

### IV. UNIVERSITY ACTIONS

**Investigation.** The Panel may determine that an extended initial inquiry is necessary to collect additional information for assessment. Otherwise, if the report was determined to be actionable, the Panel Chair will initiate an investigation into the reported conduct while cooperating with any parallel law enforcement investigation. If there is a cross-over jurisdiction with Title IX, the Panel Chair and the Title IX Coordinator will determine procedures for a joint investigation. If the report involves actions by any University personnel, the Panel Chair will contact Human Resources, as appropriate, to establish a joint investigative process.

1. The Panel Chair will appoint one or more investigators and provide written notice to the responding parties via Saint Elizabeth email. Notifications will include the following:

The allegations against them, the Complainant, if applicable, the date(s) of the alleged violation(s), and the information about the investigative process. The timing of the notice may vary based on the investigation, but the respondent (s) will have the opportunity to receive and respond to all allegations. The investigators will interview any individuals

identified as knowing the matter. A hazing investigation will typically be completed within thirty (30) days after receipt of the original report, unless an extension is deemed appropriate due to extenuating circumstances. The Panel Chair will determine if extenuating circumstances are present (e.g., an active law enforcement investigation). In some cases, a general inquiry will occur before a formal investigation is initiated. Saint Elizabeth University is not obligated to notify parties if general inquiries are made to gather additional information. The Complainants and Respondents and any other parties to the case may be accompanied by their respective advisors, including an attorney, at any meeting or proceeding related to the investigation and resolution. While advisors may provide support and advice to the parties at any meeting and/or proceedings, they may not speak on behalf of the parties, submit written statements not attributed to the party, or otherwise participate in, or in any manner disrupt, such meetings and/or proceedings.

2. During the investigation, the investigators will interview the Complainant and Respondent as well as any parties or witnesses to review the allegations and provide opportunities for response. Parties and witnesses will be informed that the University's Honor Code applies to their interview, as does the prohibition against and protection from retaliation.
3. Upon the completion of the investigation, the investigators will determine, based on a preponderance of the evidence (i.e., more likely than not), if hazing occurred.
  - a. **If the investigators determine hazing did not occur**, a summary of findings will be logged in the appropriate University case management system, and the case will be closed. The investigators will notify the relevant parties of the outcome, including the Complainant and the Respondent.
  - b. **If the investigators determine hazing has occurred and believe such hazing was so severe and/or pervasive that it presents an immediate and/or ongoing threat to student health and/or safety**, they will provide a written report of the findings to the Panel Chair, the complainant (s) and respondent (s) which also will be logged in the appropriate University case management system. The files of individuals found responsible for violating Saint Elizabeth University's Anti-Hazing Policy will also be maintained to comply with the Clery Act (including the Stop Campus Hazing Act). They will be retained for the same period as Clery Act records.
  - c. **If the investigators determine hazing occurred and do not believe such hazing was so severe and/or pervasive that it presents an immediate and/or ongoing threat to student health and/or safety**, they will provide a written report of finding to the Panel Chair, complainant (s) and respondents which also will be logged in the appropriate University case management system.
  - d. **For Sports Teams**, the investigators will provide a copy of the written report to the Athletic Director. The Associate Vice President of Academic Affairs and the Athletic

Director will determine the appropriate team sanctions, including the ongoing membership of individual student-athletes on a team.

- e. The Panel Chair will remain in communication with the law enforcement agency to provide an update on the disposition of the University inquiry and ascertain whether criminal charges will be filed. Irrespective of the status of a University investigation, a student organization's suspension may be maintained pending the outcome of an ongoing law enforcement investigation or process.

## **V. Appeal of Dismissals and Determinations**

Both parties have the right to appeal. The appeal must be submitted within five (5) business days of receiving the notice of the outcome of the investigation. The appeal is not meant to rehear or reargue the same case and is limited to the standards below. Written appeals must meet at least one of the following standards:

1. A procedural (or substantive) error occurred that significantly impacted the outcome of the hearing (e.g., substantiated bias, material deviation from established procedures, etc.)
2. To consider new evidence, unavailable during the original hearing or investigation, that could substantially impact the original finding or outcome. A summary of this new evidence and its potential impact.

Parties may not appeal under the following circumstances:

Non-attendance at meetings

Dissatisfaction with a decision and/or outcome

The Associate Vice President of Student Affairs will email the decision regarding the appeal to both the complainant and the respondent within 15 business days of receiving the appeal materials.