

THE  
**LOS ANGELES**®  
FILM SCHOOL

**CAMPUS SAFETY POLICIES**



## **1. CAMPUS SAFETY**

Education requires a safe environment for success. The Los Angeles Film School (LAFS) is strongly committed to crime prevention and the safety of our campus community members. Your cooperation is essential to minimize criminal activity and create a safer community for all. Like other institutions, colleges and universities are not without occasional crimes. You are an important member of the LAFS community of students, faculty and staff. This means that you must obey federal, state and local laws as well as the rules and regulations of LAFS. Being aware of those rules and taking personal responsibility for your own conduct and safety improves the quality of life for everyone at LAFS.

A well-informed campus community helps create a safety conscious public. LAFS prepares this report to comply with the Jeanne Clery Disclosure of Campus Security Policy and Crime Statistics Act, a federal statute requiring all colleges and universities that participate in federal financial aid programs to keep and disclose information about crime on and near their campuses.

### **1.1 The Campus Security Authority**

To help ensure the safety of the school community, LAFS has designated Campus Security Authority Personnel (CSA). The CSA is an individual the school designates as the point of contact in the event of an emergency, incident or crime. Students, faculty and staff should report criminal offenses and incidents to the CSA. These individuals also serve as a primary point of contact in the event of an emergency, incident or crime. Employees and security services personnel who handle tasks like patrolling or monitoring access also serve in campus security authority capacities. The local CSA provides training on incident reporting and submitting crime reports.

Designated Campus Security Authorities:

Director of Facilities & Security: Brian Mitchell 323.769.6868  
Director of Human Resources: Debra Allen 323.769.2214  
Title IX Coordinator & Director of Administrative Services: Dana Franklin 323.769.6827  
Vice President of Education: Jenna Langer 323.960.3840

### **1.2 Private Security Services Communication with Campus Security Authorities**

In addition to the LAFS Security Team, Andrews International (via third party contracted guard services) is utilized on-campus where there is not already a LAFS Security Officer presence. These state-licensed personnel are required to report all incidents and crime information to the appropriate Campus Security Authority and/or the LAFS Campus Safety Team (CST) per the Jeanne Clery Act. All information is reviewed by the Campus Safety Team for reporting purposes.

While Andrews International personnel and Local Campus employees cannot make arrests, LAFS does work closely with federal, state, and local law enforcement agencies to aid in the arrest of individuals committing crimes against the school and its members.

The number of assigned Andrews International personnel on campus may vary depending on the needs of the campus community and local crime trends. Each Andrews International Security officer meets that state's basic training requirements for uniformed security personnel. Authorized personnel may carry a guard license, guard certificate, security officer registration, or state-issued guard card.

### **1.3 Training of Andrews International Security Personnel**

Training of Andrews International Security personnel covers the following:

- Legal restrictions on arrest, search and seizure, and use of force.
- Report writing basics.
- Workplace violence recognition, response, and prevention.
- Jeanne Clery Act.
- Personal appearance, attitude and conduct that meet both security industry standards and those of the LAFS campus.

LAFS works with Andrews International to provide additional support posts on campus at each building. These individuals serve as a point of contact in the event of an emergency, incident or crime. The CSA advises them of this and partners with each individual to maintain an active working relationship.

During the annual safety events, the CSA will communicate to all students and staff that in addition to the LAFS Security Team, Andrews International Security personnel can also assist.

#### **1.4 Annual Review of the Campus Safety Program & Policies**

The Los Angeles Film School will conduct an annual review of our Campus Safety Program and Policies, as well as Clery-related obligations, including the Annual Security Report (ASR) to ensure continuing compliance with the Jeanne Clery Act requirements.

### **2. REPORTING ANNUAL CRIME STATISTICS**

LAFS provides notice of Reporting and Disclosure of Campus Safety Policies and Annual Crime Statistics to current students, faculty and staff.

#### **2.1 Notifying the Campus Community**

Every year, LAFS community members receive a notice of the Campus Crime Statistics Report electronically. The notice always discloses that these annual crime statistics are part of LAFS' Annual Security Report; that it is available on our website at <http://www.lafilm.edu/campus-safety>; and states how community members may request a paper copy of the report.

#### **2.2 Procedure for Gathering and Disclosing of LAFS' Annual Crime Statistics**

A police report must be filed for loss or destruction of LAFS property. Individual victims may choose to file a police report for personal property. We encourage them to do so. If asked, the CSA can assist with police reports for personal property. The CSA will also maintain a listing of all crimes that occur on campus in the Campus Crime Log (Logbook) which must be made available to the public. The Logbook is required to be available at the front desk for inquiring individuals. The Logbook for the most recent sixty (60) day period must be open to public inspection, upon request, during normal business hours. Any portion of the Logbook that is older than sixty (60) days must be made available within two (2) business days of a request. Logbooks must be kept for seven (7) years.

### **3. SAFETY AWARENESS & CRIME PREVENTION**

LAFS takes safety awareness and crime prevention measures very seriously.

#### **3.1 Crime Prevention Measures**

Part of crime prevention is being alert to and aware of your immediate environment. Here are some important ways you can help keep yourself - and the LAFS community - more safe and secure:

- Roll up windows and lock your car.
- Always take and keep your car keys with you.
- At night, travel in well-lighted areas and in pairs if possible. Avoid short cuts and deserted areas.
- Do not leave valuable items in your car, including personal items and school related materials such as laptops.
- Do not park in isolated areas.
- Leave highly valuable items at home.
- Do not leave your personal property unattended.
- Do not carry more cash than necessary.
- Keep your purse, backpack or briefcase close to your body.
- Mark personal items that you bring on campus. This includes marking textbooks and laptops with your name or some other traceable identification.
- Never bring any kind of weapon onto school property.

#### **3.2 Timely Warning Notifications to the Campus Community**

The LAFS Campus Safety Team (CST) releases a Timely Warning Notification (TWN) to alert the campus community of crimes or events that may potentially threaten students, faculty, staff or property. Posting these notices is necessary when a serious crime or a pattern of crimes or threats may put anyone in the campus community at risk. The CST is responsible for alerting the campus community (i.e., students, faculty and staff) of a particular crime or trend of crimes in a manner that is timely and will aid in the prevention of similar crimes. TWNs can be issued for threats to persons or to property. TWNs are posted in visible, accessible areas where such threats occur. LAFS may use posters, emails and on-site digital and video monitors, or other available means to inform the campus community. It is important to note that the CST is not required to issue a TWN for every crime reported but must, at a minimum, follow Clery Act guidelines. When making their decision, the CST may consult with local law enforcement. Whether the CST issues a TWN is determined on a case-by-case basis in conjunction with all the facts surrounding the crime(s), including such factors as:

- **The nature of the crime.** TWNs should focus on those crimes and offenses specifically required for reporting according to the Clery Act (e.g. homicide, sexual assault, robbery, burglary, arson, etc.) and/or seriousness of the crime.
- **The continuing danger to the campus community.** TWNs should be released if the campus community is at risk of becoming victims of similar crimes, so it is important to evaluate whether the crime was a one-time occurrence or the result of a trend of reported crimes.
- **The possible risk of compromising law enforcement efforts.** The CST should consider law enforcement

efforts when issuing a TWN, consulting with public authorities regarding the issuance of further TWNs so as not to compromise an ongoing investigation or other law enforcement efforts.

- **Community safety and awareness.** When issuing a TWN, the CST must include information about the crime that triggered it, excluding victim information. The CST must balance the need to include information about the crime while also protecting the confidentiality of the victim to the maximum extent possible. The CST may, in appropriate situations, include personally identifiable information in a TWN. Although personally identifiable information is generally protected from disclosure under the Family Educational Rights and Privacy Act (FERPA), such information may be released in an emergency. The TWN also assists in providing information that promotes safety and aids in the prevention of similar crimes.

Faculty and staff may contact the Director of Facilities & Security regarding security concerns at 323.769.6868. However, in the event of an emergency, faculty and staff should call 9-1-1 first.

### **3.3 Safety and Access to LAFS Facilities**

During all hours of operation, the LAFS facility is secured by locks on entranceways that require a proximity security card to disengage locks as well as elevators locks, which require proximity security card to engage elevator operation. In addition, the building lobby is manned and monitored by security services personnel. Students, faculty, and staff are issued a proximity card for access through security doors. During business hours, visitors to LAFS facilities will be admitted only through the main entrances.

It is essential that all students, faculty, and staff strive to keep LAFS' facilities secure from unwelcome intruders. Never loan your proximity card to anyone. Never admit anyone into LAFS' facilities who does not have a proximity card for any reason. Should an individual approach you with a request to admit him/her into LAFS' facilities with your proximity card, report the incident to security services personnel immediately.

### **3.4 Campus Maintenance**

The CST ensures campus maintenance issues that may affect safety or enhance criminal activity are resolved. The CST must notify the appropriate facilities manager and request prompt attention to the problem. LAFS facilities management personnel maintain and repair campus facilities. This includes repairs to defective doors and locking mechanisms. Exterior lighting is another important part of our commitment to campus safety.

### **3.5 Safety Programs**

LAFS sponsors at least one safety event and one sexual assault awareness event annually. A common theme of our safety events is developing members' awareness of their responsibility for their own safety and the safety of others. We focus on increasing security alertness and crime prevention education. The annual safety event varies by campus and may include CPR, AED (automated external defibrillator), Crime Prevention Programs, Self-Defense and Protection, and Local Police, Sheriff or Fire Department demonstrations.

### **3.6 Informing New Staff of Safety Reporting Procedures**

In addition to coordinating these safety events, LAFS makes a good-faith effort to inform new and existing personnel of security reporting procedures. Staff members who have regular interaction with the campus community are informed that students may approach them with crime-related incidents that need to be reported quickly to the CST.

### **3.7 Emergency Evacuation Planning**

The CST conducts at least one emergency evacuation drill per year at each building on campus. Faculty and staff are encouraged to be familiar with these procedures. All campus buildings post exit and evacuation diagrams on each floor. LAFS also maintains Emergency Response Guides (ERGs) in classrooms and common areas to provide a hands-on resource for students, faculty and staff to utilize in the event of emergencies involving medical response, evacuation, fire/smoke/explosion, severe weather, hazardous material, earthquake/power outage, intruder, civil disturbance, and bomb threat.

Regularly scheduled drills, exercises, and appropriate follow-through activities, are designed for the assessment and evaluation of emergency plans, and capabilities. Tests may be announced or unannounced. The emergency response and evacuation procedures are publicized and each test includes a description of the exercise, the date, time, and whether it was announced or unannounced. The Emergency Mass Notification (EMN) system is used in conjunction with scheduled exercises to maintain awareness of the system by students, faculty, and staff.

### **3.8 Emergency Evacuation Assistance**

Individuals who require assistance during an emergency must disclose this need to their manager (staff) or the Disability Services Coordinator (DSC) (students) at 323.960.3830. In conjunction with the CST, the DSC develops a personal emergency plan that includes specific notification and evacuation procedures for appropriate students, faculty or staff in the event of an emergency.

#### **4. REPORTING CRIMINAL ACTIVITIES**

In an emergency, dial **9-1-1** for help. We urge you to report all criminal activity, whether on or off campus, to the state or local police. You may report criminal activity to the CSA anonymously or request confidentiality. The CSA will coordinate with the local police department and private security services personnel when compiling the Annual Crime Statistics Report.

##### **4.1 Reporting Emergency Criminal Activities**

In emergencies, **dial 9-1-1 first.**

9-1-1 answers calls 24 hours a day, 7 days a week. The local police, fire or medical departments will respond immediately.

First, call 9-1-1 to report criminal offenses. You may use other emergency-response numbers to reach public emergency response agencies. After calling 9-1-1, report emergency incidents and crimes to a CSA so s/he may also respond.

The Los Angeles Police Department provides the following means for reporting criminal activities:

##### **TEXT-A-TIP**

To provide anonymous tips, text CRIMES (274637) on your cell phone and begin the message with the letters LAPD.

You may submit an anonymous tip anytime, anywhere, 24 hours a day, 7 days a week, by phone 800-222-TIPS (800-222-8477)

##### **ANONYMOUS WEB TIPS**

Battered Women Hotline  
310-392-8381

Child Abuse  
800-540-4000

Narcotics Hotline  
800-662-BUST (2878)

Narcotic Drug Abuse  
800-252-6465

Rape Hotline  
626-793-3385

Runaway Hotline  
800-551-1300

Suicide Hotline  
877-727-4747

Terrorist Threats  
1-877-A-THREAT (284-7328)

##### **4.2 Reporting Criminal Activity to the Campus Security Authority**

The CSA has the official capacity to receive all reports relating to crime at LAFS. The identity of the CSA is listed in Section I and be accessed on line at <http://www.lafilm.edu/campus-safety>.

##### **4.3 Anonymous and Confidential Reporting of Crimes**

LAFS encourages students, faculty and staff to report any suspicious or criminal activities that occur on campus. You may request confidentiality or make crime reports anonymously. Please contact your CSA and request confidentiality or anonymity if necessary.

#### **5. REPORTABLE OFFENSES**

##### **5.1 Reportable Offenses**

The *Clergy Act* requires institutions to disclose four (4) general categories of crime statistics:

- **Criminal Offenses**—Criminal Homicide, including: Murder and Non-Negligent Manslaughter; Negligent Manslaughter; Sex Offenses including: a) Forcible, and b) Non-forcible; Rape, Fondling, Incest and Statutory Rape; Robbery; Aggravated Assault; Burglary; Motor Vehicle Theft; and Arson.
- **Hate Crimes**—Any of the above-mentioned offenses, and any incidents of Larceny-Theft, Simple Assault, Intimidation, or Destruction/Damage/Vandalism of Property that were motivated by bias.\*
- **VAWA Offenses** – Any incidents of Domestic Violence, Dating Violence and Stalking. For Clery Act reporting purposes Sexual Assault is included in the Criminal Offenses category but also constitutes a VAWA offense; and
- **Arrests and Referrals for Disciplinary Action for Weapons** - Carrying, Possessing, Etc. Law Violations, Drug Abuse Violations and Liquor Law Violations.

\*Bias is an expressed negative opinion or attitude toward a group of persons based on their race, gender, gender identity, religion, disability, sexual orientation or ethnicity/national origin. Hate crimes are classified according to the FBI's *Uniform Crime Reporting Hate Crime Data Collection Guidelines* and *Training Guide for Hate Crime Data Collection*.

## 5.2 Crime Definitions

Per the *Clery Act*, institutions must classify crimes based on the Federal Bureau of Investigation's (FBI's) *Uniform Crime Reporting Handbook (UCR)*. For sex offenses only, institutions must use definitions from the FBI's *National Incident-Based Reporting System (NIBRS)* edition of the *UCR*. For the categories of Domestic Violence, Dating Violence and Stalking, institutions must use the definitions provided by the Violence Against Women Act (VAWA) of 1994.

## 5.3 Reportable Locations and Their Definitions

The Clery Act includes the following locations in the annual Campus Crime Survey.

**“Clery Geography:”** For the purposes of collecting statistics on crimes for submission to the Department and inclusion in an institution's annual security report, Clery geography includes:

- Buildings and property that are part of the institution's campus
- The institution's noncampus buildings and property
- Public property within or immediately adjacent to and accessible from the campus

For the purposes of maintaining the crime log required, Clery geography also includes, in addition to the locations above, areas within the patrol jurisdiction of the campus police or the campus security department.

- **“On Campus:”** Any building or property, owned or controlled by an institution within the same reasonably contiguous geographic area and used by the institution in direct support of, or in a manner related to, the institution's educational purposes and any building or property that is within or reasonably contiguous, that is owned by the institution but controlled by another person, is frequently used by students, and supports institutional purposes (such as a food or other retail vendor).
- **“Non-Campus:”** Any building or property owned or controlled by a student organization that is officially recognized by the institution; or any building or property owned or controlled by an institution that is used in direct support of, or in relation to, the institution's educational purposes, is frequently used by students, and is not within the same reasonably contiguous geographic area of the institution.
- **“Public Property:”** All public property, including thoroughfares, streets, sidewalks, and parking facilities, that is within the campus, or immediately adjacent to and accessible from the campus.

The Department of Education includes the following reporting location, if indicated:

- **“Local Crime Statistics:”** *Applicable statistics reported by local and state law enforcement not already included in the Los Angeles Film School's Annual Security Report.*

## 5.4 Unfounded Crimes

The Los Angeles Film School will disclose the total number of “unfounded” crimes in its Annual Security Report. On rare occasions, LAFS may remove a reported crime from its crime statistics. This may only be done when a sworn or commissioned law enforcement personnel has fully investigated the reported crime and, based on the results of this full investigation and evidence, had made a formal determination that the crime report is false or baseless and has been determined unfounded.

## 6. COOPERATION WITH LAW ENFORCEMENT AGENCIES

LAFS values its cooperative relationships with federal, state and local law enforcement agencies. In addition to annual consultations for crime statistics reporting, the Campus Security Team (CST) maintains working relationships with local law enforcement, facilitating timely lines of communication in case the authorities need to respond to an

incident at a campus location. Although LAFS does not contract with local police and law enforcement agencies for security, it contacts the appropriate authorities for annual crime reporting purposes. Law enforcement agencies are contacted in the event of an emergency on campus that requires their involvement.

## **7. NO WEAPONS ON CAMPUS**

No weapons are permitted on campus. The possession of guns, knives, electroshock devices (e.g. Taser) and other forms of weapons by employees, guests and students is prohibited on all premises, including all off-site class areas used for school purposes. Exceptions may be made for students and faculty members who are law enforcement officers required to carry a weapon at all times, even off-duty and in plain clothes. Students and faculty members who are law enforcement officers in plain clothes must contact the Campus Security Authority (CSA) prior to bringing a weapon on campus for further instructions.

### **7.1 Students**

Student requests must include a written verification letter from an authorized supervisor regarding the requirement to carry the weapon, even off-duty and in plain clothes, to the CSA. Verification letters must be provided on department letterhead, signed by an authorized supervisor or agent of the department, and must confirm that the student is in fact a law enforcement officer whose job requires carrying a weapon while off-duty and in plain clothes. The CSA will notify the student once the request is approved or denied. If the CSA denies the request or an individual does not actually need to carry the weapon at all times, the student may instead secure the weapon in his or her vehicle while on campus.

### **7.2 Faculty**

A faculty member who is an active duty law enforcement officer and requests to carry a weapon on campus must submit a written request to the CSA stating his or her name, place of work and the agency's information. The CSA will contact the agency for verification and document the findings. A faculty member who is an inactive law enforcement officer and requests to carry his or her weapon on campus will be denied. The CSA will notify the faculty member once the request to carry weapons on campus has been approved or denied.

## **8. POLICIES & PROGRAMS CONCERNING ALCOHOL & OTHER DRUGS**

### **8.1 Zero-Tolerance policy**

LAFS has adopted a "Zero-Tolerance" policy regarding the unlawful use, sale, possession or distribution of illegal drugs and alcohol. Misconduct violations relating to the Student, Faculty and/or Employee Codes of Conduct are subject to disciplinary sanctions. LAFS has established specific courses of action regarding alcohol and drug abuse, which include:

- Each year, all students, faculty and staff receive notification, to include the location, of the Annual Security Report and Campus Safety Policies that include alcohol and drug prevention information.
- Students, faculty and staff are encouraged to report instances of abuse:
  - Students can report to student advisors or a Campus Security Authority (CSA).
  - Employees can report issues to their immediate supervisors or Human Resources.
- LAFS supports alcohol and drug abuse prevention programs.
- Alcohol related advertising or promotions are not permitted on campus.
- The Student Development Department maintains a list of local treatment facilities.
- Employee benefits offer resources to assist with alcohol and drug addiction related issues.
- The school conducts a biennial review of its program to:
  - Determine its effectiveness and implement changes to the program if they needed.
  - Ensure that its disciplinary sanctions are consistent and enforced.

### **8.2 Alcohol and Other Drugs Prevention and Counseling Services**

The school provides at least two annual safety education events. The first covers topics relevant to the safety of the campus community and its surrounding area. A second event includes sexual assault awareness and prevention. This program may involve how alcohol and other drug use may impact the risk of sexual assault. Please contact the CSA for information on where and when these education events will occur.

### **Student Resources**

Students are encouraged to seek information and help regarding substance abuse through the Student Advising department. Student Advisors will assist students with developing a plan of action that might involve referral to other resources as needed. To protect students' privacy, information obtained regarding a student during participation in any related program is treated as confidential. Students can contact Student Advising by calling (323) 960-3830.

**Employee Resources** LAFS provides an Employee Assistance Program (EAP) as an employee benefit. All employees have access to EAP regardless of if they obtain benefits through the company. This service provides referral services and treatment sessions as needed. Employees enrolled in health care plans can obtain additional

substance abuse benefits, including outpatient and inpatient services. Information about the EAP may be obtained from the Human Resources Department or online at <https://hrhq.plansource.com>.

### National Resources

We encourage anyone dealing with substance abuse issues (not just our employees and students) to also contact national agencies for guidance and assistance in identifying a counseling, treatment, or rehabilitation program. Support is always available with confidentiality and discretion. One need only ask.

- **Al-Anon Family Groups (888)4AL-ANON (425-2666) <http://www.al-anon.alateen.org/>**
- **Alcoholics Anonymous <http://www.aa.org/>**
- **American Council on Alcoholism (800)527-5344 <http://www.aca-usa.com/>**
- **Cocaine Anonymous <https://ca.org/>**
- **Narcotics Anonymous <http://www.na.org/>**
- **National Council on Alcoholism and Drug Dependence, Inc. (800)NCA- Call (622-2255) <https://ncadd.org/>**
- **National Institute on Alcohol Abuse and Alcoholism <http://niaaa.nih.gov/>**
- **National Institute on Drug Abuse (800)662-HELP (662-4357) <https://www.drugabuse.gov/>**
- **The Substance Abuse and Mental Health Services Administration's (SAMHSA) Substance Abuse Treatment Facility Locator <https://findtreatment.samhsa.gov/locator>**

### 8.3 Health Risks of Alcohol and Other Drugs

The health consequences of drugs and alcohol depend on the frequency, duration, and the intensity of use and can include both physical and psychological effects. Overdose is a risk for all drugs. It can result in coma, convulsions, psychosis or death. Combinations of certain drugs, such as alcohol and barbiturates, can be lethal. The purity and strength of doses of illegal drugs are uncertain.

Continued use of substances can lead to tolerance (requiring more and more of a drug to get the same effect), dependence (physical or psychological need), or withdrawal (painful, difficult and dangerous symptoms when stopping the use of drugs).

Long-term use of drugs can lead to malnutrition, organ damage, and psychological problems. The risk of AIDS and other diseases increases if drugs are injected.

The consumption of alcohol or drugs when pregnant may cause abnormalities in babies.

### Physical and Psychological Dependence and Effects of Specific Drugs

DRUGS	PHYSICAL DEPENDENCE	PSYCHOLOGICAL DEPENDENCE	POSSIBLE EFFECTS
Opium, Morphine, Heroin, Hydro morphine, Merperdine/Pethidine	High	High	Euphoria, drowsiness, depression, constricted pupils, nausea
Codeine	Moderate	Moderate	
Methadone	High	High-Low	
	High-Low	High-Low	
Chloral Hydrate/Other Depressants	Moderate	Moderate	Slurred speech, disorientation, drunken behavior without odor of alcohol
Barbiturates	High-Mod	High-Mod	
Benzodiazepines	Low	Low	
Methaqualone, Glutethimide	High	High	
Cocaine/Crack, Amphetamines, Phenmatrazine, Methylphenidate, Other Stimulants	Possible	High	Increased alertness, excitation, Increased pulse rate and blood pressure, insomnia, loss of appetite
LSD, Mescaline, Peyote, Other Hallucinogens	None	Unknown	Illusions and hallucinations, poor perception of time and distance
Phencyclidine	Unknown	High	
Phencyclidine Analogues	Unknown	Unknown	



Marijuana, Hashish, Hashish Oil Tetrahydrocannabinis	Unknown	Moderate	Euphoria, relaxed inhibitions, increased appetite, disoriented behaviors.
Anabolic Steroids	Unknown	Unknown	Kidney and liver damage, heart failure
Alcohol	Moderate	High	Reduced coordination and alertness, large doses can cause unconsciousness, hypothermia, respiratory arrest, death.
Inhalants	Unknown	High	Nausea, damage to organs
Nicotine	High	High	Cancer
Caffeine	Unknown	High	Nausea, diarrhea, trebling

#### 8.4 Standards of Conduct

LAFS' Student Code of Conduct clearly state that the unlawful manufacture, sale, delivery, unauthorized possession, or use of any illicit drug is prohibited on property owned or otherwise controlled by the school. LAFS enforces a "Zero Tolerance" policy regarding underage drinking. If any individual is apprehended for violating any alcohol or other drug related law while at a LAFS location or activity, LAFS will fully cooperate with federal and state law enforcement agencies.

#### 8.5 Sanctions LAFS Will Impose for Alcohol or Other Drugs Violations

LAFS abides by local, state and federal sanctions regarding unlawful possession of drugs and the unlawful consumption of alcohol. Any member of the LAFS community found consuming or selling alcohol and other drugs on school property is subject to disciplinary action up to and including dismissal from the school, depending on the seriousness of the situation.

#### 8.6 Federal Laws and Legal Sanctions

Local, state and federal laws establish severe penalties for unlawful possession or distribution of illicit drugs and alcohol. These sanctions, upon conviction, may range from a fine, probation, or lengthy imprisonment. In the case of possession and distribution of illegal drugs, these sanctions could include the seizure and summary forfeiture of property, including vehicles. It is especially important to know that recent federal laws have increased the penalties for illegally distributing drugs, to include life imprisonment and fines in excess of \$1,000,000. Here are some examples of Federal Drug Trafficking Penalties (<http://www.justice.gov/dea/agency/penalties.htm>):

DRUG/SCHEDULE	QUANTITY	PENALTIES	QUANTITY	PENALTIES
Cocaine (Schedule II)	500 - 4999 gms mixture	<b>First Offense:</b> Not less than 5 yrs, and not more than 40 yrs. If death or serious injury, not less than 20 or more than life. Fine of not more than \$2 million if an individual, \$5 million if not an individual  <b>Second Offense:</b> Not less than 10 yrs, and not more than life. If death or serious injury, life imprisonment. Fine of not more than \$4 million if an individual, \$10 million if not an individual.	5 kgs or more mixture	<b>First Offense:</b> Not less than 10 yrs, and not more than life. If death or serious injury, not less than 20 or more than life. Fine of not more than \$4 million if an individual, \$10 million if not an individual.  <b>Second Offense:</b> Not less than 20 yrs, and not more than life. If death or serious injury, life imprisonment. Fine of not more than \$8 million if an individual, \$20 million if not an individual.  <b>2 or More Prior Offenses:</b> Life imprisonment.
Cocaine Base (Schedule II)	5-49 gms mixture		50 gms or more mixture	
Fentanyl (Schedule II)	40 - 399 gms mixture		400 gms or more mixture	
Fentanyl Analogue (Schedule I)	10 - 99 gms mixture		100 gms or more mixture	
Heroin (Schedule I)	100 - 999 gms mixture		1 kg or more mixture	
LSD (Schedule I)	1 - 9 gms mixture		10 gms or more mixture	
Methamphetamine (Schedule II)	5 - 49 gms pure or 50 - 499 gms mixture		50 gms or more pure or 500 gms or more mixture	
PCP (Schedule II)	10 - 99 gms pure or 100 - 999 gms mixture	100 gm or more pure or 1 kg or more mixture		
DRUG/SCHEDULE	QUANTITY	PENALTIES		
Other Schedule I & II drugs (and any drug	Any amount	<b>First Offense:</b> Not more that 20 yrs. If death or serious injury, not less than 20 yrs, or more than Life. Fine \$1 million if an individual, \$5 million if not an		

product containing Gamma Hydroxybutyric Acid)		individual. <b>Second Offense:</b> Not more than 30 yrs. If death or serious injury, not less than life. Fine \$2 million if an individual, \$10 million if not an individual
Flunitrazepam (Schedule IV)	1 gm or more	
Other Schedule III drugs	Any amount	<b>First Offense:</b> Not more than 5 years. Fine not more than \$250,000 if an individual, \$1 million if not an individual. <b>Second Offense:</b> Not more than 10 yrs. Fine not more than \$500,000 if an individual, \$2 million if not an individual
Flunitrazepam (Schedule IV)	30 to 999 mgs	
All other Schedule IV drugs	Any amount	<b>First Offense:</b> Not more than 3 years. Fine not more than \$250,000 if an individual, \$1 million if not an individual. <b>Second Offense:</b> Not more than 6 yrs. Fine not more than \$500,000 if an individual, \$2 million if not an individual.
Flunitrazepam (Schedule IV)	Less than 30 mgs	

#### FEDERAL DRUG TRAFFICKING PENALTIES – Marijuana

DRUG	QUANTITY	1st OFFENSE	2nd OFFENSE*
Marijuana	1,000 kg or more mixture; or 1,000 or more plants	<ul style="list-style-type: none"> <li>• Not less than 10 years, not more than life</li> <li>• If death or serious injury, not less than 20 years, not more than life</li> <li>• Fine not more than \$4 million if an individual, \$10 million if other than an individual</li> </ul>	<ul style="list-style-type: none"> <li>• Not less than 20 years, not more than life</li> <li>• If death or serious injury, mandatory life</li> <li>• Fine not more than \$8 million if an individual, \$20 million if other than an individual</li> </ul>
Marijuana	100 kg to 999 kg mixture; or 100 to 999 plants	<ul style="list-style-type: none"> <li>• Not less than 5 years, not more than 40 years</li> <li>• If death or serious injury, not less than 20 years, not more than life</li> <li>• Fine not more than \$2 million if an individual, \$5 million if other than an individual</li> </ul>	<ul style="list-style-type: none"> <li>• Not less than 10 years, not more than life</li> <li>• If death or serious injury, mandatory life</li> <li>• Fine not more than \$4 million if an individual, \$10 million if other than an individual</li> </ul>
Marijuana	more than 10 kgs hashish; 50 to 99 kg mixture more than 1 kg of hashish oil; 50 to 99 plants	<ul style="list-style-type: none"> <li>• Not more than 20 years</li> <li>• If death or serious injury, not less than 20 years, not more than life</li> <li>• Fine \$1 million if an individual, \$5 million if other than an individual</li> </ul>	<ul style="list-style-type: none"> <li>• Not more than 30 years</li> <li>• If death or serious injury, mandatory life</li> <li>• Fine \$2 million if an individual, \$10 million if other than individual</li> </ul>
Marijuana	1 to 49 plants; less than 50 kg mixture	<ul style="list-style-type: none"> <li>• Not more than 5 years</li> <li>• Fine not more than \$250,000, \$1 million other than individual</li> </ul>	<ul style="list-style-type: none"> <li>• Not more than 10 years</li> <li>• Fine \$500,000 if an individual, \$2 million if other than individual</li> </ul>
Hashish	10 kg or less		
Hashish Oil	1 kg or less		

### 9. SEXUAL VIOLENCE AND SEXUAL HARASSMENT POLICIES, PROCEDURES AND RESOURCES, TITLE IX, VAWA & CLERY ACT

It is the policy of LAFS to provide a work and study environment free of sexual harassment. All students, faculty, and staff should be aware that LAFS strongly disapproves of any conduct that constitutes sexual harassment and will take disciplinary measures to ensure compliance. All complaints will be investigated and appropriate action taken.

#### 9.1 EDUCATION AND TRAINING

LAFS is part of a national effort to provide education, prevention, and response to the issues of sexual assault, intimate partner violence, and stalking. Addressing these issues is a part of the school's commitment to providing students with a healthy and safe learning environment. A key component of this safe learning environment is an atmosphere free of violence, coercion, and fear. As part of this effort, all members of the LAFS' community — students, staff and faculty — are required to complete an online sexual violence prevention and intervention training program. Information regarding the online training program may be found in Addendum A.

Topics covered in the programs include:

- Definitions of different forms of sexual violence
- Social norms, including the attitudes and beliefs that can normalize violence

- Responding to sexual violence using methods that acknowledge the impact of violence and trauma on survivors' lives
- Local resources, including confidential support for survivors of sexual violence and appropriate services for those accused of sexual violence
- Rights and options about reporting sexual violence

Students: All incoming students are required to take the education and training program within the first six weeks of their program.

Faculty and Supervisors: Faculty and supervisors are required to complete two hours of sexual harassment prevention training every two years, and new faculty and supervisors are required to take training within the first six weeks of hire.

Staff who are not supervisors: All new employees must receive training within the first six weeks of hire.

## **9.2 REPORTING, INVESTIGATION AND DISCIPLINARY PROCEDURES**

The Los Angeles Film School values civility, dignity, diversity, education, honesty, and safety and is firmly committed to maintaining a campus environment free from all forms of sex discrimination, sexual harassment, and sexual assault. Sexual Misconduct and Relationship Violence, defined more specifically below, are inconsistent with these values, violate institutional policy, will not be tolerated and are expressly prohibited. Similarly, retaliation for having brought forward a concern or allegation or for participating in an investigation of a report of Sexual Misconduct or Relationship Violence is also expressly prohibited and is grounds for disciplinary action.

This policy provides information regarding how an individual – whether a student, faculty member, or staff member – can make a report of Sexual Misconduct or Relationship Violence impacting a student and how the school will proceed once it is made aware of any such report. For faculty and staff members who believe they are the victim of sexual misconduct, please follow the policies in the Employee Policy Manual.

### **Preliminary Issues & Definitions**

This Policy prohibits “Sexual Misconduct” and “Relationship Violence,” broad categories encompassing the conduct defined below. Sexual Misconduct and Relationship Violence can be committed by anyone, including third parties, and can occur between people of the same sex or different sexes and regardless of one’s biological sex or transgendered sex. This policy applies to Sexual Misconduct and Relationship Violence that is committed against a student when that Sexual Misconduct or Relationship Violence occurs: (i) on campus; (ii) off-campus if in connection with a School-sponsored program or activity; or (iii) off-campus if allegedly perpetrated by a fellow student, faculty member, staff member, or third party when the victim/reporting student reasonably believes that the off-campus conduct has created a hostile educational environment.

What is “Sexual Misconduct”? Sexual Misconduct includes:

- Sexual Assault: Having or attempting to have sexual intercourse, cunnilingus, or fellatio without Consent (as defined below). Sexual intercourse is defined as anal or vaginal penetration by a penis, tongue, finger, or inanimate object.
- Non-Consensual Sexual Contact: Any intentional sexual touching with any body part or object by any person upon any person without Consent.
- Sexual Exploitation: An act attempted or committed through the abuse or exploitation of another person’s sexuality. Examples include, but are not limited to, prostituting another student; inducing a student into sexual intercourse, sexual contact, or other sexual activity by implicit or explicit threat of exposure of personal information or academic consequences; nonconsensual video or audio-taping of sexual activity; allowing others to observe a personal consensual sexual act without the knowledge or Consent of all involved parties; and knowingly transmitting or exposing another person to a sexually transmitted infection without the person’s knowledge.
- Indecent Exposure: the exposure of the private or intimate parts of the body in a lewd manner in public or in private premises when the accused may be readily observed.
- Sexual Harassment: unwelcome sexual advances, requests for sexual favors, and other physical or verbal conduct of a sexual nature when it meets any of the following: (a) Submission to such conduct is made either explicitly or implicitly a term or condition of an individual’s academic status; or (b) Submission to or rejection of such conduct by an individual is used as the basis for academic decisions affecting such individual; or (c) Such conduct has the purpose or effect of unreasonably interfering with an individual’s work or academic performance or creating an intimidating, hostile, or offensive environment for working, learning, or living on campus.

What is “Relationship Violence”? Relationship Violence includes:

- Domestic Violence: Violence, including but not limited to sexual or physical abuse or the threat of such abuse, committed by a current or former spouse or intimate partner or any other person from whom the student is protected under federal or applicable state law.
- Dating Violence: Violence, including but not limited to sexual or physical abuse or the threat of such abuse, committed by a person who is or has been in a social relationship of a romantic or intimate nature with the alleged victim. The existence of such a relationship is generally determined based on a consideration of the length and type of relationship and the frequency of interaction.
- Stalking: A course of conduct directed at a specific person that would cause a reasonable person to fear for their own safety or the safety of others or suffer substantial emotional distress. A course of conduct means two or more acts in which a person directly, indirectly or through third parties, by any action, method, device or means, follows, monitors, observes, surveils, threatens, or communicates to or about a person or interferes with a person's property.

The following also constitute violations of this Policy:

- Complicity: Assisting, facilitating, or encouraging the commission of a violation of this Policy.
- Retaliation: Acts or attempted acts for the purpose of interfering with any report, investigation, or proceeding under this Policy, or as retribution or revenge against anyone who has reported Sexual Misconduct or Relationship Violence or who has participated (or is expected to participate) in any manner in an investigation, or proceeding under this Policy.
- Prohibited retaliatory acts include, but are not limited to, intimidation, threats, coercion, or discrimination.

To be clear, retaliation against a Complainant for reporting an incident or against any witness who participates in an investigation is strictly prohibited.

Who are "Complainants" and "Respondents"?

The Los Angeles Film School is not a court of law. We also do not engage in victim-blaming or rushes to judgment. Therefore, without judgment, we refer to anyone who reports that s/he has experienced Sexual Misconduct as a "Complainant" and to anyone who reportedly has engaged in Sexual Misconduct as a "Respondent."

### **Defining Consent**

In many cases of Sexual Misconduct, the central issue is consent or the ability to give consent. Consent is a voluntary agreement to engage in sexual activity. Consent to engage in sexual activity must exist from beginning to end of each instance of sexual activity. Past Consent does not imply future Consent, and Consent to engage in one form of sexual activity does not imply Consent to engage in a different form of sexual activity. Consent is demonstrated through mutually understandable words and/or actions that clearly indicate a willingness to engage in a specific sexual activity. Consent must be knowing and voluntary. To give Consent, a person must be awake, of legal age, and have the capacity to reasonably understand the nature of her/his actions. Individuals who are physically or mentally incapacitated cannot give Consent. Silence, without actions evidencing permission, does not demonstrate Consent. Where force, threats, or coercion is alleged, the absence of resistance does not demonstrate Consent. Force, threats, or coercion invalidates Consent. The responsibility of obtaining Consent rests with the person initiating sexual activity. Use of alcohol or drugs does not diminish one's responsibility to obtain Consent or negate one's intent.

Consent to engage in sexual activity may be withdrawn by either person at any time. Once withdrawal of Consent has been clearly expressed, the sexual activity must cease. Incapacitation is the inability, temporarily or permanently, to give Consent, because the individual is mentally and/or physically helpless due to drug or alcohol consumption, either voluntarily or involuntarily, due to an intellectual or other disability that prevents the student from having the capacity to give Consent, or the individual is unconscious, asleep or otherwise unaware that the sexual activity is occurring. In addition, an individual is incapacitated if he or she demonstrates that they are unaware of where they are, how they got there, or why or how they became engaged in a sexual interaction. Where alcohol is involved, incapacitation is a state beyond drunkenness or intoxication. Some indicators that an individual is incapacitated may include, but are not limited to, vomiting, unresponsiveness, inability to communicate coherently, inability to dress/undress without assistance, inability to walk without assistance, slurred speech, loss of coordination, lack of awareness of circumstances or surroundings, or inability to perform other physical or cognitive tasks without assistance.

### **Title IX Coordinator**

The Title IX Coordinator is responsible for, among other things, coordinating the campus's efforts to comply with and carry out the campus's responsibilities under Title IX of the Education Amendments of 1972, including compliance with this policy. The Title IX Coordinator will help to coordinate any investigations under this Policy.

The Title IX Coordinator for the school is:

Dana Franklin  
6353 Sunset Blvd.  
Hollywood, CA 90028  
(323) 769-6827 (dfranklin@lafilm.edu)

## **Reporting & Confidentiality**

We encourage victims of Sexual Misconduct & Relationship Violence to talk to somebody about what happened – so they can get the support they need, and so the School can respond appropriately. Different employees on campus have different abilities to maintain confidentiality:

Employees and contractors are required to report all the details of an incident to the Title IX Coordinator. A report to these employees (called “responsible employees”) constitutes a report to the School and generally obligates the School to investigate the incident and take appropriate steps to address the situation. The following campus employees (or categories of employees) are examples of responsible employees: the Title IX Coordinator, all Deputy Title IX Coordinators, President, V.P. of Education, Student Advisors, Security Staff (including contract security personnel), all full-time and part-time Faculty, and Human Resources.

The School will seek to protect the privacy and confidentiality of the individuals involved in any report of alleged Sexual Misconduct or Relationship Violence to the extent possible and allowed by law. The Title IX Coordinator will evaluate any request for confidentiality in the context of the School’s responsibility to provide a safe and nondiscriminatory environment to all members of its community. The School will complete any publicly available record-keeping, including Clery Act reporting and disclosure, without the inclusion of identifying information about the alleged victim. It will also maintain as confidential any interim measures or remedies provided to the alleged victim to the extent that maintaining confidentiality will not impair its ability to provide the interim measures or remedies.

In addition to internal reporting, the School strongly encourages anyone who believes they have experienced a sexual assault (or any other crime) to make a report to local law enforcement, Hollywood Community Police Station at (213) 972-2971. Below are the steps involved in making a police report.

- Contact the police department in the city where the crime occurred. Talk to a police officer as soon as possible after the crime took place so your memory of the incident and individuals involved is fresh.
- Know that you can file a police report at the police station or ask for an officer to come to your home. Answer the police officer’s questions as accurately and thoroughly as possible. Be prepared to give your contact information in case police have follow-up questions
- Receive a case number for your police report. Refer to the number when you want an update on your case and if you’d like a copy of the police report.
- Understand that there is no fee to file a police report. However, there may be a fee to get a copy of the police report.

Collection and preservation of evidence relating to the reported sexual assault is essential for law enforcement investigations, so prompt reporting of the incident to law enforcement is especially critical. Designated staff will, upon request, assist an individual in making a report to law enforcement as necessary and appropriate.

Although we strongly encourage complainants to report to local law enforcement, such a report is not a prerequisite to the School’s review and investigation of any complaint covered by this Policy. The School will honor a Complainant’s request not to report the matter to local law enforcement UNLESS we have a reasonable basis to believe that the safety and security of the campus community is at risk. In this event, the School will endeavor to notify a Complainant or Reporter of the institution’s intent to report the matter to law enforcement in advance of any such report.

The School does not limit the time frame for reporting under this Policy, although a delay in reporting may impact the School’s ability to take certain actions.

Other Code of Conduct Violations: The School encourages students who have been the victim of Sexual Misconduct or Relationship Violence to come forward. Students should not be discouraged from reporting such incidents because they fear discipline for their own violations of the Student Code of Conduct. Therefore, the School has discretion not to pursue other violations of the Student Code of Conduct that occurred in the context of the reported incident of Sexual Misconduct or Relationship Violence.

## **Response Procedure**

Students are encouraged to report any incident of Sexual Misconduct or Relationship Violence to the Title IX Coordinator, V.P. of Education or Student Advisors. If a report is made verbally, the School will request a written statement by the student. Upon receipt of a report, the School will generally proceed as described below.

1. Investigation Commencement: The School will provide a timely and thorough investigation. Barring exigent circumstances, cases of Sexual Misconduct and Relationship Violence will generally be resolved within a 60-day period once the incident has been reported. An extension of time may be necessary if witnesses are unavailable or uncooperative or due to other extenuating circumstances beyond the control of the investigator.

2. Initial Response: Once the School is put on notice of possible Sexual Misconduct and Relationship Violence, the Complainant will be offered appropriate confidential support, accommodations, and other resources and will be notified of applicable policies and procedures. Obligated accommodations include the ability to alter academic schedules, to withdraw from/retake a class without penalty, and to access academic support. The Respondent also will be offered appropriate resources and notified of applicable policies and procedures.

3. Interim Intervention: Pending a final determination, the Title IX Coordinator will take appropriate interim measures. These measures may include, but are not limited to, the imposition of a no-contact order and/or employment, academic modifications, and may limit a student or organization's access to certain School facilities or activities pending resolution of the matter. The School may impose an Interim Suspension on the Respondent pending the resolution of an alleged violation when the School determines, in its sole discretion, that it is necessary in order to protect the safety and well-being of members of the campus community.

4. Decision to Proceed to Investigation: If the Complainant is willing to participate in the review and investigation process, the School will proceed as described below in Section III (E). If the Complainant requests a confidential investigation, the School will seek to protect the privacy and confidentiality of the Complainant to the extent possible and allowed by law. The Title IX Coordinator will evaluate any request for confidentiality in the context of the School's responsibility to provide a safe and nondiscriminatory environment to all members of its community. If a confidential investigation is requested and agreed to, the School will investigate without revealing the name of the Complainant in any interview or email and will not ask questions that inadvertently or reasonably could reveal the identity of the Complainant. If the Complainant asks that the report of sexual misconduct not be pursued, the School will consider the interests of the Complainant, the campus community, law enforcement, and/or other appropriate interests under the circumstances. The School, in consultation with the Title IX Coordinator, will make a final decision on whether and to what extent it will conduct an investigation, and notify the Complainant promptly.

5. Investigation Procedure: The Title IX Coordinator does not function as advocates for either Complainants or Respondents. The Title IX Coordinator can, however, identify advocacy and support resources for either Complainants or Respondents. The Respondent will receive written notice of the report and the nature of the alleged misconduct. He/She will be advised in writing of the investigation process and opportunity to provide any relevant evidence. The Investigation will generally be conducted by the Title IX Coordinator if the Respondent is a student. If the Respondent is a faculty or staff member, Human Resources will also participate in the investigation. The Title IX Coordinator will separately interview both Complainant and Respondent. Both parties will be able to provide evidence and suggest other witnesses to be interviewed. The Title IX Coordinator will interview other relevant witnesses and review any other available relevant evidence. Both the Complainant and Respondent can have another individual present during their own respective interviews. If the Complainant or Respondent elects, they may have an attorney present during their own interview, but said attorney may not advocate during the interview.

#### 6. Determinations

- For cases where the Respondent is a student: The Title IX Coordinator (or designee) will present all evidence to a Determination Panel. The Title IX Coordinator will be appropriately trained regarding handling and considering sexual misconduct and relationship violence cases. The Title IX Coordinator will weigh the evidence presented and decide whether additional evidence is necessary for consideration. Ultimately, the Title IX Coordinator will make a determination of whether a violation of the Sexual Misconduct & Relationship Violence Policy or any other policy has occurred. The School reserves the right to convene a Determination Panel to review the evidence and make the determination in appropriate circumstances.
- For cases where the Respondent is a Faculty or Staff Member: Human Resources will present all evidence to a Determination Panel. The Determination Panel shall be comprised of three individuals, who have no relation to the Complainant or Respondent. The Determination Panel will weigh the evidence presented and make a determination whether a violation of the Sexual Misconduct & Relationship Violence Policy or any other policy has occurred.

7. Standard of Proof: In all cases under the Sexual Misconduct policy, the Title IX Coordinator (or designee) or the Determination Panel will determine if a violation of policy has occurred by the preponderance of evidence standard. Thus, they will determine whether it is more likely than not that a violation has occurred.

8. Potential Sanctions: If a violation of policy has been found, the Title IX Coordinator or the Determination Panel will impose appropriate sanctions, including but not limited to coaching, training, probation,

suspension, or expulsion in the case of students or coaching, training, written warning, demotion, or termination in the case of employees.

9. Outcome Notifications: Both the Complainant and Respondent will be notified in writing of the outcome of the investigation and of the sanctions imposed, if any.

10. Appeals: If the Complainant or Respondent is a student, he or she may appeal the outcome determination by written appeal to the Vice President of Education of the school within 15 days of notification of the outcome. An appeal may be made based only on one or more of the following reasons:

- New and significant evidence appeared that could not have been discovered by a properly diligent charged student or complainant before or during the original investigation and that could have changed the outcome.
- The Finding is Arbitrary and Capricious: Reading all evidence in the favor of the non-appealing party, the finding was not supported by reasonable grounds or adequate consideration of the circumstances. In deciding appeals, the President is allowed to make all logical inferences in benefit of the non-appealing party.
- Disproportionate Sanctions: The sanctions were disproportionate to the findings.

The appeal shall consist of a written statement requesting review of the conduct decision or sanction and explaining in detail the basis for the appeal. The Vice President of Education, or designated representative, will notify the non-appealing party of the request for an appeal. Within five working days of receipt of the notice, the non-appealing party may submit a written statement to be included in the case file. The appeal may proceed without the non-appealing party's written statement if it is not submitted within the designated time limit. The Vice President of Education will endeavor to make a determination of the appeal within 15 business days of receipt. The Vice President's decision is final.

### 9.3 Sexual Offender Registration

The Campus Sex Crimes Act (CSCPA) of 2000 is a federal law that provides for the tracking of convicted sex offenders enrolled at, or employed by, institutions of higher education. The CSCPA is an amendment to the Jacob Wetterling Crimes Against Children and Sexual Violent Offender Act. The federal law requires state law enforcement agencies to provide local educational institutions with a list of registered sex offenders who have indicated they are enrolled, employed or carrying on a vocation at local educational institutions.

LAFS is required to inform the campus community of all registered sex offenders enrolled or employed by LAFS and has a policy that a list of any registered sex offenders enrolled at or employed by LAFS will be made available for inspection through Student Development.

In addition, a database of all registered sex offenders in California can be accessed at The Megan's Law California website located at <http://meganslaw.ca.gov/>.

The CSCPA further amends the Family Education Rights and Privacy Act of 1974 (FERPA) to clarify that nothing in the act can prohibit an educational institution from disclosing information provided to the institution concerning registered sex offenders.

This statement is provided in compliance with the Campus Sex Crimes Prevention Act of 2000.

## 10. EMERGENCY NOTIFICATION PROCEDURES

LAFS maintains emergency management policies, procedures and systems to protect lives and property, and to continue necessary critical functions and essential services. An **emergency** is defined as a situation that poses an immediate threat to the health or safety of someone in the LAFS community or that significantly disrupts LAFS programs and activities.

Under the Clery Act, every institution is required to immediately notify the campus community upon confirmation of a significant emergency or dangerous situation occurring on the campus that involves an immediate threat to the health or safety of the students or employees. The following are examples of significant emergencies and dangerous situations, that upon confirmation, would trigger an immediate emergency notification from the Campus Safety Team (CST):

- Fire
- Flood
- Viral or bacterial outbreak and other serious illness
- Extreme weather conditions
- Earthquake

- Gas leak
- Civil unrest or rioting
- Bomb threat, armed intruder, terrorist incident, explosion
- Nearby chemical or hazardous water spill

The Emergency Mass Notification (EMN) process includes emergency escalation procedures, mass notifications, and supporting systems. In an emergency, dangerous or otherwise high-risk situation on campus, these processes enable LAFS to contact or send notices, alerts or warnings “without delay” to students, faculty and staff, including those students enrolled at LAFS and receiving Title IV funds.

### **10.1 Policy**

Review of emergency events and the related issuance of EMNs is the responsibility of the LAFS Campus Safety Team (CST). These notices and warnings are issued when the CST confirms that there is a significant emergency or a dangerous situation involving an immediate threat to the health or safety of members of the LAFS campus community. One such method of emergency communication is the Timely Warning Notification (TWN) discussed in Section III.

### **10.2 Reporting Issues to the Campus Safety Team**

Individuals should immediately call emergency **9-1-1** for police assistance if they believe the situation warrants it. In addition to **9-1-1** reports, incidents that may warrant contacting the Campus Security Authority (CSA) are those posing a serious or continuous health or safety threat to the school community such as dangerous or otherwise high-risk situations on the LAFS campus.

- LAFS students should contact any member of the CSA. Individual CSA contact information can be found in Section I of this document.
- Other contacts include the security desk(s) or Security Team members, where available.
- Students, staff and faculty on campus may contact the Director of Facilities & Security directly at 323.769.6868 or via email at [securityoffice@lafilm.edu](mailto:securityoffice@lafilm.edu).

Security personnel must immediately report any issues they receive to the CST for immediate review. The CST maintains a record of all EMNs.

### **10.3 Notifications and Warnings**

As soon as the CST receives notice of a significant emergency or dangerous situation involving an immediate threat to the health or safety of students, faculty and/or staff, it will immediately perform the following functions:

- Confirm that there is a significant emergency or dangerous situation;
- Determine which campus community segments should receive notifications; and
- Initiate the EMN system.

The CST is responsible for reviewing issues on a case-by-case basis, considering factors such as:

- the nature of the situation,
- the continuing danger to the campus community,
- the notification’s content,
- the possible risk of compromising law enforcement efforts, and
- those incidents that, in the judgment of CST, warrant an EMN.

Notices sent as part of the EMN policy and procedures may include the following information:

- date and time of the notification and incident,
- the reason for the notification,
- the risk, threat, or emergency facing the campus community,
- the locations that may be affected (which could include targets),
- appropriate procedures, which may include:
  - evacuation,
  - lockdown or shelter in place,
- safety suggestions,
- location closing information,
- procedures to help to contain or protect against the problem,
- contact information for related questions or issues,
- resources such as telephone numbers, website and other sources for information regarding the incident, additional details and directives to preserve safety and security, maps or other useful attachments.

The CST will use their discretion to determine what information should be disclosed and whether the notice should be delayed or limited to certain segments of the LAFS community. The CST will make these determinations based on



the nature of the issue, instructions from public safety officials, considering whether its release could compromise efforts to contain the emergency or the safety of the community.

All warnings, notifications and related communications must be approved by the CST. For the duration of the emergency, follow-up information will be provided to the LAFS community as warranted. At the conclusion of an incident and when authorized by CST, an "all clear" message will be sent to all recipients of previous alert messages. The CST will be responsible for maintaining copies and tracking all EMNs.

#### **10.4 Notification Methods**

The CST may activate all or individual elements of the EMN system. Depending on the nature of the incident, EMNs may be distributed by any of the following means by individuals authorized by the CST:

- **Technology alerts**
  - Text messaging
  - Recorded messages to phones or similar devices
  - E-mail notifications
- **Visual alerts**
  - Posting electronic alerts on organizational home pages, message boards, websites and other sites where information will be likely to reach the LAFS community
  - Posting on entry doors, bulletin boards, or other accessible areas affected by the situation
- **Person to person directives**
  - Door-to-door notifications
  - Direct phone calls
  - Phone trees

#### **10.5 Maintenance of Emergency Contact Information**

Students, faculty and staff are responsible for having current and accurate information on file with LAFS to ensure they receive notifications from the EMN. Note that LAFS does not assume responsibility for incorrect contact information on file which may cause a notification not to be sent due to technical malfunctions, human or technical error, lost, delayed or garbled data or transmissions, omission, interruption, deletion, defect or failures of any telephone or computer line or network, costs, computer equipment, software or any other factors which may cause a lost notification. Persons with disabilities and their managers, faculty or Disability Services Coordinator are responsible for working together to ensure that a person nearby is assigned to provide assistance.

The IMT Team is responsible for maintaining the EMN system, including software updates as needed and on a regular basis.

#### **Related Links**

U.S. Department of Homeland Security (<http://www.dhs.gov>)  
National Weather Service (<http://www.nws.noaa.gov>)  
American Red Cross (<http://www.redcross.org>)  
Federal Emergency Management Agency (<http://www.fema.gov>)

### **11. MONITORING AND ENFORCEMENT**

If any individual does not comply with this policy or if LAFS determines that any actions were inappropriate or inconsistent with the law, or any LAFS policy, standard, or guideline, LAFS may take action against a student, faculty, or staff. This can include termination and appropriate actions as described in the student, faculty and employee handbooks or similar governing guides. If LAFS determines individuals are or have been engaged in criminal activity, LAFS may refer this matter to law enforcement and provide any related documentation to assist in prosecution.

#### **Citations**

Higher Education and Opportunity Act of 2008-Public Law 110-315  
Right to Know and Campus Security Act-20 U.S.C. § 1092(f) et seq  
34 C.F.R. §668.46

*The Jeanne Clery Disclosure of Campus Security Policy and Campus Crime Statistics Act or Clery Act is a federal statute codified at 20 U.S.C. § 1092(f), with implementing regulations in the U.S. Code of Federal Regulations at 34 C.F.R. 668.46. The Clery Act is a federal statute that requires colleges and universities that receive federal financial aid funding to compile crime statistics from their campuses and provide safety information. Compliance is enforced by the United States Department of Education, which can impose civil penalties, up to \$27,500 per violation, against institutions for each infraction and can suspend institutions from participating in federal student financial aid programs.*