Recruiting Policy

Delaware Valley College’s Center for Student Professional Development

1. Employer must provide clear and detailed **Job Description** outlining responsibilities –
   a. Specific responsibilities and duties required
   b. Nature of the position (i.e., project-or task-based)
   c. Preferred qualifications, if appropriate (e.g., class year(s), major(s), minimum GPA, skills, courses, etc.)
   d. Compensation arrangements
   e. Must subscribe to the Equal Employment Opportunity (EEO) laws established by the Federal government and any applicable state and local laws

2. Third-Party Recruiters:

   The CSPD follows professional standards for working with third-party recruiters as set by the National Association of Colleges and Employers (NACE). Below is a detailed explanation of third-party recruiters provided by NACE:

   Third-party recruiters are agencies, organizations, or individuals recruiting candidates for temporary, part-time, or full-time employment opportunities other than for their own needs. This includes entities that refer or recruit for profit or not for profit, and it includes agencies that collect student information to be disclosed to employers for purposes of recruitment and employment (such as staffing agencies, search firms, contract recruiter, online job posting or resume referral services, leasing agencies)

   Delaware Valley College’s CSPD requires third-party recruiters to disclose the information listed below:

   a) Third-party recruiters will disclose to students the name(s) of the client, or clients, that the third-party recruiter is representing and to whom the students’ credentials will be disclosed.

   b) When deemed necessary, third-party recruiters will disclose information upon request to Career Services that would enable Career Services to verify that it is recruiting for a bona fide job opportunity. Information should include contact information for the organization for which the third party is providing recruiting services. Career Services must respect the confidentiality of this information and may not publish it in any manner.

   c) Third-party recruiters will not disclose to any employer, including the client-employer, any student information without obtaining prior written consent from the student. Under no circumstances can student information be disclosed other than for the original recruiting purposes nor can it be sold or provided to other entities. Online job-posting and resume-referral services must prominently display their privacy policies on their web sites, specifying who will have access to student information.

   d) Third-party recruiters attending career fairs will represent employers who have authorized them and will disclose the names of the represented employers to Career Services upon request.
*Please note that third-party recruiters are not eligible to recruit students for internships.*

3. **Commission, Sales, and Financial Industry Positions:**
Due to varying employment, business and compensation models used by employers, Delaware Valley College’s Center for Student Professional Development will exercise discretion in working with those employers that comply with our established policies and practices including policies with regard to commission positions as applicable. Commission based sales, full-time opportunities and paid summer/internship opportunities must comply with the following criteria:

1. Direct Hire (W-2) positions only.
   a. 1099 positions (or freelance positions especially those that would employ students by a private individual (i.e. babysitter, editor of a book, tutor, caretaker, interior designer for your private home, etc.) are eligible for posting via our Campus Portal and must include the following disclaimer in the posting: “This is a 1099 position. Persons paid on a 1099 basis are independent contractors and are self-employed. Independent contractors are required to pay all self-employment taxes (Social Security & Medicare) as well as income tax. Independent contractors generally do not receive any type of employment benefits from the client. For more information please refer to www.irs.gov or talk with a tax professional.”
   b. 1099 independent contractor recruiting is not permitted at Career Fairs nor eligible for On-Campus Interviews.

2. Company must provide training and ongoing mentoring.

3. With the possible exception of obtaining industry licenses, no up-front investment, out-of-pocket, non-refundable fees, purchase of goods, inventories, sales leads required.

4. No part of compensation is dependent on recruiting others.

5. No repayment/reimbursement for training costs, draws-on-commission/cash advances on salary should the DelVal student or alumna/alumnus decide to leave the position for any reason.

4. **Posting Unpaid Internships**
We encourage employers – particularly those in the private sector – to pay interns whenever possible. As many students focus their search on paid positions out of necessity, offering paid internships often results in a larger, more diverse, and more qualified pool of applicants.

Private sector employers should also be familiar with the United States Department of Labor guidelines for legally offering unpaid internships. This [fact sheet](#) produced by the [United States Department of Labor](#) provides general information to help determine whether interns must be paid under the minimum wage and overtime under the Fair Labor Standards Act for the services that they provide to “for-profit” private sector employers.
5. **Prohibited Postings**  
The following postings are prohibited by the Center for Student Professional Development.

a. All positions where students are hired to sell or promote an organization’s products or services to other Delaware Valley College students.
b. All positions from employers, volunteer agencies and third-party recruiting organizations that require students and alumni to pay a fee prior to employment.
c. All positions with organizations that provide financial incentives to staff who recruit new hires for the organization and/or for which the recruiting staff member receives a portion of the new hire’s commission.

6. **Virtual Internships**  
The majority of positions posted at Delaware Valley College are traditional, where student interns work at the same physical location as their supervisor and have a safe and specific work space. If you are interested in posting a virtual internship, you must indicate this in the Job Title (for example, Social Media *Virtual Intern*).

a. The site must use some type of online project management tool, such as Google Docs or Basecamp, so that work is stored in the "cloud" and not on a personal computer.
b. The position includes a regular e-mail report (weekly, at a minimum) where the student provides information such as hours worked, challenges or problems encountered, and results obtained, and asks any questions that he or she may have.
c. The position includes a weekly virtual meeting via tele-presence technology (e.g. Skype - highly preferred); if this meeting is impossible, then phone conversations are expected.
d. For local virtual positions (the site is not far from campus, but you are allowing the student to work from campus), you must meet with the student in a public place regularly throughout the internship.