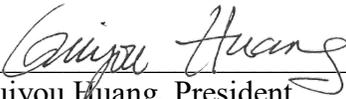


EDINBORO UNIVERSITY OF PENNSYLVANIA

**ON-CAMPUS & ELECTRONIC EMPLOYER RECRUITING
Policy No. G022**

Recommended for Approval by 
Dr. Michael Hannan, Provost and VP for Academic Affairs

Approved by  on 10/14/2020
Dr. Guiyou Huang, President

Review Date: As Required

INTENT

This policy outlines the criteria that must be met and the process that must be followed by employers if they wish to be approved for conducting on-campus recruitment and posting on Edinboro University's online career and internship database.

POLICY

Edinboro University's Center for Career Development and Experiential Learning (CCDEL) provides recruiting opportunities to organizations offering professional career and internship opportunities via on-campus interviews, information tables, job fairs, and online job postings through the University's online job posting database. The CCDEL adheres to recruiting policies established by the National Association of Colleges and Employers (NACE).

The CCDEL serves only as a clearinghouse of information regarding job and internship opportunities. The posting of a position on the CCDEL's website, bulletin board, or online career and internship database should not be interpreted as an endorsement by the University. Students and alumni should personally research openings and agencies prior to accepting an offer or entering into any contractual agreements. Edinboro University is not liable to any person for any claim arising from its activities under this policy.

Edinboro University is not responsible for any representations or guarantees with regard to job postings, nor is it responsible for wages, working conditions, safety, or other work-related issues that may arise after placement with an employer. Students and alumni are responsible for conducting their own due diligence on any organization or its posting prior to forwarding any information to the prospective employer, engaging in any interview, or accepting any position. It is the student/alumni's obligation to seek information and legal representation if they feel they have been discriminated against or mistreated in the workplace or in the interview process.

DEFINITIONS

Third-Party Recruiter is defined as agencies, organizations, or individuals employed by an agency or organization 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.

Multi-level Marketing: According to the Federal Trade Commission (FTC), Multi-Level Marketing (MLM) companies sell their products or services through person-to-person sales that take place from one's home or online. Individuals who join MLM companies are often called "independent distributors," "participants," or "contractors." Most MLM companies claim that those who join can make money by selling the MLM company's products to customers who are not already involved in the MLM, and by recruiting new distributors and earning commissions based on what they buy and their sales to new customers. If you join a MLM company, your recruits, the people they recruit, and so on, become your sales network, or "downline." If the MLM is not a pyramid scheme, it will pay you based on your sales to retail customers, without having to recruit new distributors.

PROCEDURES

A. Employer Eligibility

The CCDEL will provide services for employer organizations that meet the following basic criteria:

- The employer organization must accurately describe the responsibilities and requirements for the opportunities it offers in all publicity.
- All conditions for advertised positions must be clearly publicized in the position description. This includes but is not limited to unpaid internships, and positions that are commission only.
- Employer organizations operate in congruence with the University policy on Equal Opportunity/Affirmative Action and Nondiscrimination. An employer or agency using the services of the CCDEL understands that compliance with all related federal, Commonwealth of Pennsylvania, and local government statutes and regulations is required for initiation or continuation of the CCDEL's services.

B. Third-Party Recruiting

Edinboro University provides recruitment opportunities to third-party agencies and organizations through the CCDEL via on-campus recruiting and job postings on its online career and internship database under these specific guidelines:

1. The Third-Party may not have access to the electronic resume search component of the database.
2. The Third-Party must disclose the name of the employer for which it is recruiting.
3. The Third-Party may not charge applicants.
4. The Third-Party must provide a specific description and all requirements within all job listings, including any position that is "commission only" or sales-based.
5. The Third-Party must act in accordance with NACE Principles for Professional Conduct for Career Services & Employment Professionals (naceweb.org/principles).
6. The Third-Party must comply with the requirements of the Family Educational Rights and Privacy Act (FERPA), and can only release candidate information with written permission from the applicant. Disclosure of candidate information is not permitted unless written permission is given by the applicant, and may be done so only for a specific listed position.

C. Commission Only/Entrepreneurial/Multi-Level Organizations

Employers who post commission-only positions must clearly state that the position is commission-only in the position description. This applies to positions with a paid training period that transitions to commission-only upon completion of training. Commission-only internships are not accepted. All employers who require upfront fees to be paid by candidates for employment or have Multi-level Marketing practices are not permitted to recruit on campus or have access to the online career and internship database.

D. Unpaid Internships

An internship consists of structured learning experiences with clearly defined responsibilities, learning outcomes, supervision and evaluation processes. Credit-bearing internships at Edinboro University are coordinated through the academic departments. For-profit employers offering unpaid internships are encouraged to review the U.S. Department of Labor guidelines at <https://www.dol.gov/whd/regs/compliance/whdfs71.pdf>. Non-profit employers may review unpaid internship guidelines provided by the National Council of Nonprofits <https://www.councilofnonprofits.org/tools-resources/interns-employee-or-volunteer>. Academic credit should not replace compensation for work performed during an internship.

The CCDEL only approves posting of internship opportunities that meet all other guidelines and criteria outlined in this policy.

E. Foreign-Based Firms

Employers that are foreign-based firms with no U.S. locations and third-party recruiters who represent foreign-based firms with no U.S. locations will not be immediately eligible to use the electronic job posting.

The employer may send the website administrator a minimum of two letters of reference from either two career services professionals representing different U.S. colleges or universities with whom the employer has worked on a personal basis, or a letter of reference from a faculty member or administrator from one of the 14 Pennsylvania State System universities with whom the employer has worked.

F. Posting Procedures

General posting procedures in the online career and internship database are listed below. These policies also apply to posting physical advertisements for employment on the Edinboro University campus.

1. No employer may post an advertisement for employment anywhere on campus, including chalk drawings on sidewalks or classrooms and/or physical signs without approval from the CCDEL. Employers that violate this policy may be refused service in the online career and internship database and at campus recruiting events. Employers may not solicit current students to post such advertisements without approval from the CCDEL, even when students are current employees of the employer.
2. Employer representatives must have an email address associated with the employer/organization website domain (no Gmail, Hotmail, Yahoo, etc.) Individual contact names and email addresses should match when appropriate. Third-party recruiters must be part of a recruitment agency.
3. Employers should have a functioning website that clearly relates to the organization that contains information for a potential applicant. Social media websites should not replace a

functioning website. Employers utilizing social media in place of websites may be subject to additional verification before approval.

4. Employers must be identifiable as a place of business. Addresses should not be a PO Box or a contact's personal residence.
5. All postings are screened and approved by a CCDEL staff member. Software is utilized to track foreign or non-matching IP addresses and other indicators of a potentially illegitimate posting. The CCDEL reserves the right to deny postings that elicit a "red flag" response from our software system. Students and alumni are responsible for conducting their own due diligence on any organization or its posting prior to forwarding any information to the prospective employer, engaging in any interview, or accepting any position.

G. Excluded Positions

The following types of positions are not accepted for electronic posting in the online career and internship database or on-campus recruiting:

1. Commission/quota-based campus marketing internships.
2. Positions with an application process that ask students to allow access to their social media profiles or release information associated with their social media profiles.
3. Positions with application or training processes that ask students to refer friends or family members to the employer or provide contact information of friends or family members.
4. In-home/private/independent childcare, nanny, elder-care or tutoring.
5. 1099 independent contractor positions, other than those for full-time degreed employment post-graduation.
6. Positions or programs that charge a fee for participation or require unpaid training as a condition of employment.
7. Employment outside the United States posted by a third-party.

H. Alcohol Policy

The CCDEL adheres to both the NACE guidelines, that state that serving alcohol should not be part of the recruiting process, and the University alcohol policy. All recruiting activity, including information sessions and events both on and off-campus, will be alcohol-free.

I. Right to Refuse Service

Edinboro University is committed to the principles of equal opportunity, respect, and fair treatment for all. Edinboro University students and alumni rely on its relationship with employers to advise and protect them, to the best of its ability, from problematic or unethical practices. Accordingly, the CCDEL reserves the right to reject recruitment requests from any prospective employer whose postings, practices, policies or procedures appear to violate the University's commitment to equal opportunity.

Additional factors that may lead to exclusion from recruitment activities (including access to the online job posting) include: fraud; misrepresentation; breach of confidentiality; complaints by or harassment of Edinboro University students, alumni, or staff; failure to adhere to University policies; violation of federal, state and local laws; reports from other colleges and universities of inappropriate conduct; and requiring personal information (e.g. bank and/or social security numbers) when not part of the hiring process.

The CCDEL reserves the right to investigate complaints by students about employers or jobs posted through the electronic job posting and resume referral database. If it is determined that a complaint is justified, the CCDEL may choose to deny the employer services and report the offending organization to appropriate agencies.

RELATED POLICIES

C006 – Harassment, Intimidation, and Institutional Vandalism
 G004 – Sexual Harassment and Related Unprofessional Conduct
 G005 – Equal Opportunity / Affirmative Action and Non-Discrimination

CONTACT INFORMATION

Contact	Office	Address	Telephone
Executive Director	Center for Career Development & Experiential Learning	Baron-Forness Library Learning Commons	814-732-2781