

## **Recruiting Activities Policy**

To ensure the quality of our services, and to minimize risk to Grinnell College students, alumni, and other users of our services, the Center for Careers, Life, and Service (CLS) has outlined this policy to govern all recruiting activities that occur on the Grinnell College campus and that are sponsored by the CLS. The guidelines below are in accordance with, and a supplement to, the [Principles for Professional Ethical Practice](#) established by the National Association of Colleges and Employers (NACE).

### **SECTION I: Definition of Recruiting Activities**

Recruiting activities include, but are not limited to, on-campus: career or internship fairs; interviews; information sessions or meetings; company presentations; information tables; presentations and guest panel discussions; postings for jobs, internships, fellowships, post-graduate service opportunities; and other advertised opportunities communicated to students through bulletin boards, posters, mail announcements, and other campus communication methods.

### **SECTION II: Communication**

Organizations are expected to go through the CLS for their recruiting purposes and refrain from contacting other Grinnell departments, offices, programs, faculty, staff, or students directly. This is to ensure compliance with this policy and centralize communication on-campus.

### **SECTION III: Minimum Requirements**

The Center for Careers, Life, and Service will sponsor recruiting activities that meet the following conditions:

- 1) All organizations seeking to recruit students for any activity or employment position must comply with all federal, state, and local equal employment opportunity regulations (including ADA) and the College's nondiscrimination policy;
- 2) All job postings must supply the position title, description, and qualifications; a company/organization description; and appropriate application instructions. Anonymous postings will not be accepted;
- 3) All organizations recruiting for employment purposes must have a public, formal website and the recruiting contacts must have email addresses directly affiliated with the organization they are representing;
- 4) Postings for internship positions must require or prefer enrollment in a bachelor's degree program;

- 5) All “for-profit” private-sector employers wishing to post an unpaid internship position must review and agree to meet the criteria set forth by the [Department of Labor Fair Labor Standards Act](#):
  - a. The extent to which the intern and the employer clearly understand that there is no expectation of compensation. Any promise of compensation, express or implied, suggest that the intern is an employee—and vice versa.
  - b. The extent to which the internship provides training that would be similar to that which would be given in an educational environment, including the clinical and other hands-on training provided by educational institutions.
  - c. The extent to which the internship is tied to the intern’s formal education program by integrated coursework or the receipt of academic credit.
  - d. The extent to which the internship accommodates the interns’s academic commitments by corresponding to the academic calendar.
  - e. The extent to which the internship’s duration is limited to the period in which the internship provides the intern with beneficial learning.
  - f. The extent to which the intern’s work complements, rather than displaces, the work of paid employees while providing significant educational benefits to the intern.
  - g. The extent to which the intern and the employer understand that the internship is conducted without entitlement to a paid job at the conclusion of the internship.
- 6) Postings for full-time positions must require or prefer a completed bachelor’s degree;
- 7) Posting of part-time employment positions is permitted only for organizations located within the Grinnell city limits;
- 8) Posting of materials or other forms of solicitation for recruiting purposes must be approved by and coordinated by the CLS.

#### **SECTION IV: Excluded Recruiting Practices**

The Center for Careers, Life, and Service will not sponsor recruiting activities for opportunities if:

- 1) The opportunity involves on-campus solicitation including, but not limited to, the posting of materials and/or sale of products or services.
- 2) The organization is sponsoring an individual to establish their own business/organization for the purpose of selling products or services, and/or recruiting other individuals to establish their own business/organization.
- 3) Compensation for the opportunity is exclusively commission or fees/percentage of sales from others under their sponsorship in the organization.
- 4) The job, internship, fellowship or post-graduate opportunity requires an individual to pay a fee—either directly or through the raising of funds—to participate.
- 5) The employer requires an initial payment or investment, account balance, or similar fiscal requirement, with the organization itself serving as an umbrella or parent corporation. The initial investment may include, but is not limited to: requirement to attend unpaid orientation or training sessions; direct payment of a fixed fee; payment to attend orientation or training sessions; and/or the purchase, leasing, or renting of a starter kit, sales kit, or presentation supplies.

- 6) The opportunity negatively affects the academic progress of a student, or encourages a student to discontinue their studies.
- 7) The employer fails, for any reason, to provide necessary information needed to post a job vacancy or internship opportunity (e.g., job description, qualifications, and application instructions).
- 8) Upon request, the employer is unable or unwilling to provide written documentation of registration with a Better Business Bureau.
- 9) Upon request, the employer refuses to provide references to vouch for their organization.

## **SECTION V: Start-ups**

The Center for Careers, Life, and Service has established these criteria for identifying appropriate entrepreneurial employment opportunities for promotion through its services. Start-ups must have progressed sufficiently in their business development process so that they can:

- 1) Provide a company name, business address, website and email address, and identify a principal as the key contact.
- 2) Verify that they are not seeking potential partners or investors.
- 3) Confirm that they have obtained the necessary business licenses and Tax ID's as well as sufficient funding, including identifying their funding model and investors, if requested.
- 4) Offer positions for pay, not just for equity.
- 5) Provide clearly defined organization and position descriptions in Handshake.

Those ventures who cannot meet these guidelines may re-contact the Center for Careers, Life, and Service at a later stage to discuss access to services.

## **SECTION VI: Marijuana and Cannabis Industries**

Grinnell College and the CLS will not allow marijuana or cannabis related organizations to recruit on campus or permit positions involved with the use, production, testing, or distribution of recreational or medical marijuana to be posted in Handshake or any other Grinnell platform. As the use of marijuana is illegal at the federal level and Grinnell College receives federal funds, we must comply with federal law. In addition, the use of marijuana violates the Drug-Free Schools and Communities Act of 1989 and continues to be banned on campus.

## **SECTION VII: Third-Party Agencies**

A third-party agency or recruiter represents a candidate or an employer client, and is not the principal employing organization. This includes, but is not limited to, organizations such as contract recruiters, career development consultants, career-marketing firms, and temporary or contract agencies.

The CLS is interested in providing all possible employment opportunities to our students. We will work with and provide services to selected third party and contract agencies and/or recruiters, who agree to comply with the following policies and procedures:

- 1) If requested by the College, the agency will reveal the identity of the employer being represented and the nature of the relationship between the agency and the employer, and permit career services to verify this information by contacting the client.

- 2) If the Center for Careers, Life, and Service has an existing relationship with the client, we will inform the third-party agency and decline to post the position.
- 3) Provide a position description for valid openings. In accordance with the Family Education Rights and Privacy Act (FERPA), release candidate information only with the written permission of the employment candidate and only to the identified employer.

### **SECTION VIII: Service and Volunteer Recruiting (pre-graduation)**

The recruitment of current Grinnell College students for unpaid service and/or volunteer opportunities is generally restricted to local community partners. If organizations have a need for current volunteers, they should contact the Service & Social Innovation team at 641-269-4940 to have an exploratory conversation.

### **SECTION IX: Reporting of Data**

When requested, a recruiting organization may supply to the Center for Careers, Life, and Service information regarding Grinnell students successfully recruited. This includes students hired to fill full-time, internship, or other related positions for the organization. Information may include, but is not limited to, student name, title, position's division or unit within the organization, geographic location of position, employment start date, or compensation..

### **SECTION X: Campus Solicitation Policy**

External organizations seeking to reserve space on campus to sell products or services, advocate for a cause, solicit support for an issue, or share political materials is not permitted.

### **SECTION XI: Disclaimer**

Grinnell College's Center for Careers, Life, and Service reserves the right, in its sole discretion, to deny any organization or recruiter access to the services offered by the Center for violations of these policies, as well as reasons including but not limited to:

- 1) Any violation of state or federal laws.
- 2) Misrepresentation of employer information or absence of information.
- 3) Complaints by students and alumnae.
- 4) Harassment of Grinnell College students, alumnae, staff or faculty.
- 5) Requiring personal information at the time of application, such as bank and social security numbers.
- 6) Fraud.
- 7) Breach of confidentiality as required by the Family Educational Rights and Privacy Act (FERPA).

### **SECTION XII: Policy Changes & Updates**

Changes and/or updates to this policy will be made without notice.