

# EMPLOYER POLICIES – Capital University Career Development

## EMPLOYER AUTHENTICITY AND INTEGRITY

All employers who wish to recruit Capital students and alumni must be deemed legitimate organizations with verifiable business name, physical address, email address, phone number, and website (unless for a private family), and the name of a contact who can be reached at the listed contact information.

We also expect that employers seeking to recruit our students and alumni abide by legal and ethical principles. We encourage all employers to use the [Principles for Ethical Professional Practice](#) (NACE) as a guide.

## JOB POSTING POLICY

All postings must contain accurate information concerning the positions being advertised. We reserve the right to deny the approval of job postings that are proven to be fraudulent or misleading in their description to potential candidates.

We also reserve the right to decline postings that require a financial investment by candidates, or positions that may involve unreasonable risks or postings for positions that conflict with the NACE Principles of Professional Conduct.

The following conditions apply to posting a job or internship on Handshake:

- All organizations must agree to all EEO/Affirmative Action requirements and guidelines
- No fees of any kind will be charged to students or alumni
- Handshake will not be used to solicit business of any kind, including for advertising internship programs for which there is a fee
- No job posting will be allowed by Third Party Recruiters who do not provide the name of the end employer to Career Development.

## COMMISSION, SALES, AND FINANCIAL INDUSTRY POSITIONS

Employers and individuals offering employment/entrepreneurial opportunities must pay a base salary equal to or greater than the federal minimum wage and comply with federal, state, and local regulations, with the following exception:

Due to varying employment, business, and compensation models used by employers, Career 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:

- Direct Hire (W-2) positions only. Those offering 1099 contracts are not eligible to post
- Company must provide training and mentoring
- Company must provide marketing and advertising of product to be sold
- With the possible exception of obtaining industry licenses, no up-front investment, out of pocket, non-refundable fees, purchase of goods, inventories, sales leads can be required.
- No part of compensation is dependent on recruiting others
- No repayment/reimbursement for training costs, draws on commission, cash advances on salary should the Capital student or alumni decide to leave the position for any reason.

## “PYRAMID”, “MULTI-LEVEL MARKETING” EMPLOYERS AND “NETWORK MARKETING” ORGANIZATIONS

Employers and individuals offering employment/entrepreneurial opportunities based on a “pyramid” or “multi-level” type of networking structure, and requiring or encouraging the recruitment of others who recruit others to sell products or services, are not permitted to post positions, recruit on campus or attend job fairs.

Network Marketing Organizations are not considered “employers” by Career Development and are not eligible to participate in any form of recruiting on campus or through our job board.

This includes organizations that engage in the following:

- Sponsoring individuals with the expectation that they will set up their own business for the purpose of selling products or services along with recruiting other individuals to set up their own business.

- Requiring an initial cash or capital investment, account balance or similar fiscal requirement from individuals, with the organization itself serving as an umbrella or parent corporation. The initial investment may include but is not limited to such things as direct payment of a fixed fee, payment to attend an orientation or training session, and/or purchase of a starter kit.
- Compensation in the form of fees from others under their sponsorship in the organization and/or a percentage of sales generated by others.

### THIRD PARTY RECRUITING AGENCIES

Third Party Recruiters are, according to NACE, “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 the purposes of recruitment and employment.” We follow general NACE guidelines in working with third-party agencies.

Employers listing opportunities on our job board must comply with our commitment to nondiscrimination and the National Association of Colleges and Employers (NACE) [Principles for Ethical Professional Practice](#).

We provide direct assistance to third party agencies that meet the following criteria:

- Charge no fees to the candidate
- Reveal the identity of the employer being represented and the nature of the relationship between the agency and the employer, and permit Career Development to verify such information by contacting the employer directly.
- If requested, provide a position description for a valid opening.
- In accordance with the Family Educational Rights and Privacy Act, release candidate information provided by students through the university exclusively and only to the identified employer. Re-disclosure of candidate information is not permitted.

### GUIDELINES FOR UNPAID INTERNSHIPS

Capital University regards experiential learning opportunities as an essential part of education. Career Development is committed to helping students find internships that expand knowledge of their subject area as well as provide essential work experience.

The Department of Labor has set up criteria to ensure that employers do not take advantage of students by offering positions as unpaid internships that have little to do with the students’ education. Unpaid internship postings that do not meet these criteria may be rejected from Handshake.

The Labor Department’s “primary beneficiary” criteria for a legal unpaid internship include:

1. 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, suggests that the intern is an employee—and vice versa.
2. 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.
3. The extent to which the internship is tied to the intern’s formal education program by integrated coursework or the receipt of academic credit.
4. The extent to which the internship accommodates the intern’s academic commitments by corresponding to the academic calendar.
5. The extent to which the internship’s duration is limited to the period in which the internship provides the intern with beneficial learning.
6. 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.
7. 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.

**Additional information is available here:** <https://www.dol.gov/whd/regs/compliance/whdfs71.pdf>