

**UNIVERSITY OF WISCONSIN-WHITewater**  
**CAREER SERVICES**  
**Guidelines for Recruiting at UW-Whitewater**

Career Services occupies a unique space between students/alumni and employers, and plays a key role to ensure positive connections throughout the recruitment process. In order to ensure the recruiting experience is positive for candidates and employers, UW-Whitewater abides by the National Association of Colleges and Employers (NACE) Principles for Ethical Professional Practice. The NACE Principles are based upon two basic precepts: to maintain a recruitment process that is fair and equitable, and to support informed and responsible decision-making by candidates. The intent of this document is to provide clear and specific guidelines on how Career Services will operationalize these two basic precepts, and provide expectations for employers accessing our services and programs.

**Employers Eligible for Service:**

Career Services provides employers with a number of methods to recruit our students and alumni, including: an online platform to interact with students (Handshake); Career Services social media and other communication channels; on-campus interview program; career fairs; mock interviews; etiquette dinners; class presentations; tabling and information sessions; as well as various sponsorship opportunities. While Career Services typically does not endorse organizations, the inclusion in career programs and events may imply to students that Career Services has vetted the employer and that students/alumni can feel comfortable applying to these organizations. In order for Career Services to protect our students/alumni, Career Services is required to limit access to services based on the following conditions:

- Only organizations that are legal employing entities are eligible for service. Service will not be provided to private individuals or homes.
- Ineligible for service are organizations that fail to comply with Equal Opportunity Policy and the NACE Principles for Ethical Professional Practice (Addendum #1).
- Ineligible for service are multi-level marketing organizations.
- Ineligible for service are employers that require students/alumni to purchase products/services contingent upon their employment.
- Employers that require students to deposit monies for business materials will be allowed service, provided they have a clear refund policy and clearly communicate the terms of employment to students/alumni. The decision to provide service will be determined on a case-by-case basis by Career Services staff.
- Employers must not be hiring to replace current employees on strike.
- Employers in the adult entertainment industry will not be eligible for service.
- Employment professionals may conduct activities through other campus organizations, including student organizations and academic departments. However, it is expected that all activities be conducted in accordance with these Guidelines for Recruiting at UW-Whitewater.
- UW-Whitewater faculty and staff will not prescreen candidates for an employer. These activities place the university and its agents in the role of an employment agency, which the organization is not.
- Career Services staff reserve the right to determine eligibility on a case-by-case basis.
- Career Services reserves the right to deny access to recruiting services to any employer that violates or does not follow these recruiting guidelines.

## **Job and Internship Posting Terms and Conditions**

Listed below are terms, conditions and expectations for employers who use our Handshake platform:

- All job and internship postings must clearly state the employing organization's name, and include complete contact information (phone, email address, physical address, and website address). The employing organization's email address should match the organization's website domain, and no personal email addresses (i.e., yahoo, gmail, etc.) may not be used by the employing organization.
- Full-time professional jobs and internships posted should be career-related and professionally oriented and preferring candidates pursuing or already possessing a university degree.
- Position descriptions must be detailed and appropriate. Staff may ask for clarification or additional information if they believe a description is lacking details. Career Services will not post positions in which the job or internship description is ill-defined, or is subject to suspicion.
- The application process must be clearly stated for students/alumni to review.
- If a position is 100 percent commission based, the position must be a full-time career opportunity and this commission information must be clearly stated and defined in the posting.
- Employing organizations must use respectful language when communicating with staff and students/alumni through Handshake.
- Career Services will not post any internship positions that do not comply with Addendum #2 Internships.

### **On- and Off-Campus Part-Time and "Student Employment" Jobs:**

While attending college many UW-Whitewater students work in jobs that they do not intend to hold upon graduation. These jobs may be on- or off-campus, and are often part-time and/or seasonal. While the primary intent of Handshake is for internships and degree-required professional positions for our graduates, Career Services does allow on-campus and off-campus employers with part-time and seasonal jobs to post on Handshake, provided they meet the following guidelines (In addition to the Job and Internship Posting Terms and Conditions above):

#### **On-Campus Jobs:**

- All on-campus departments and employing units are required to post all student employment opportunities (both Work Study and Regular Pay) on Handshake.
- On-campus employers can request training by emailing [career@uww.edu](mailto:career@uww.edu).

#### **Off-Campus Jobs:**

- Part-time jobs during the school year are limited to southeast/central Wisconsin. Seasonal jobs during the summer and/or breaks may be out of the immediate area.
- Organizations eligible to post on Handshake must be a legal employing entity. We will not post positions for private individuals.

### **Employer Use of Information Tables**

UW-Whitewater offers the use of information tables for organizations to promote to students. Primarily the use of these tables is restricted to University organizations and departments. However, Career Services is allowed to sponsor employers who wish to promote their opportunities to our students at a cost of \$50 per tabling date. The following guidelines will govern the use of these tables by employers:

- The maximum number of times an employer may use an information table is five (5) times per semester. Requests must be made to Career Services, who will reserve the information tables

for the employer, based upon availability. It is best to reserve tables at least two weeks in advance.

- Each employer will receive one 5 foot table and two chairs within a 5' x 4' space.
- Information tables must be staffed during the entire time of use by the employer.
- We will not sponsor organizations for the purpose of selling products or services to our students.
- Employers are responsible to remove all materials at the end each use. There will be no overnight storage of items, and the University is not responsible for the security of items.
- No outside food or beverage may be brought in for distribution. You must use UWW Catering ([catering@uww.edu](mailto:catering@uww.edu)).
- The operation of information tables must be conducted in a manner which will not interfere with hallway traffic, and the behavior of individuals staffing information tables must be appropriate to a public setting. Disruptions to students will not be tolerated. Employers may be interactive but not high pressure with our students.

### **Employer Use of Facilities for Information Sessions and Receptions**

Employers may use meeting rooms at the University to hold information sessions for a cost determined by the room capacity. The following guidelines will govern the use of these rooms by employers:

- Rooms may only be reserved to recruit our students and alumni for internships and jobs. Employers may not use rooms for training or other purposes.
- Requests must be made to Career Services, who will reserve the rooms for the employer, based upon availability. It is best to reserve rooms at least one month in advance.
- Employers are responsible to remove all materials at the end of each use. There will be no overnight storage of items, and the University is not responsible for the security of items.
- No outside food or beverages may be brought in for distribution. You must use UWW Catering ([catering@uww.edu](mailto:catering@uww.edu)). Career Services staff will not make catering arrangements for these events.

### **Employer Use of Bulletin Boards on Campus**

Bulletin boards are not used extensively by students and are therefore not an effective way to promote employment opportunities. However, if an employer wants, Career Services staff will post on general bulletin boards in the University Center. Employers should send ([career@uww.edu](mailto:career@uww.edu)) no more than 5 flyers to Career Services to post.

### **Third-Party Recruiters**

Temporary agencies, staffing services, outsourcing contractors, etc. recruiting to hire for their own organization are considered employers, not third-party recruiters, and will be expected to comply with the NACE Principles for Employment Professionals.

In providing service for third-party recruiters, Career Services requires the following criteria be met:

1. All third-party recruiting organizations that recruit UW-Whitewater students and/or alumni are expected to follow these Guidelines for Recruiting at UW-Whitewater and abide by the UW-Whitewater Non-Discrimination and Equal Opportunity Policy, and the NACE Principles for Ethical and Professional Practice (Addendum #1).
2. In recruitment activities, third-party recruiters must disclose the names of represented employers and position descriptions for eligible jobs upon request by Career Services staff.
3. Candidates must not be charged for service.

4. Recruiting activities are limited to job posting only on Handshake.
5. Student and/or alumni information provided to third-party recruiters is to be used solely for the purpose of the position the candidate has applied to.

### **Questionable Recruitment and Employment Practices**

Career Services strives to protect the welfare of students, therefore we maintain the right to deny access to UW-Whitewater students for recruitment purposes.

Questionable recruitment and employment practices that will be assessed by Career Services include, but are not limited to, the following activities:

- “Any practice that improperly influences and affects job acceptances. Such practices may include undue time pressure for acceptance of employment offers and encouragement of revocation of another employment offer” (NACE Principles for Professional Practice).
- Conducting recruitment activities on campus without the knowledge of Career Services. This may include soliciting students outside of sanctioned recruitment activities and holding employment interviews in common spaces.

Career Services also reserves the right to withhold a job or internship posting if an academic department at UW-Whitewater requests that relations with an employer or internship host be restricted or terminated.

## **Addendum #1**

### **UW-Whitewater Non-Discrimination and Equal Opportunity Policy and NACE Principles for Ethical Professional Practice**

#### **Non-Discrimination and Equal Opportunity Policy**

UW-Whitewater fully supports the principles of inclusion, diversity, and equality in all of the institution's endeavors. UW-Whitewater's definition of diversity is broad, including, but not limited to: race, color, national origin, gender, gender identity or expression, religion, age, disability, veterans status, ancestry, creed, sexual orientation, marital status, arrest record, military service, guard or reserve status, except where, through business necessity a characteristic is proven an essential bonafide occupational requirement.

#### ***NACE Principles for Ethical Professional Practice***

The following NACE Principles for Ethical Professional Practice were developed to offer guidance when it comes to the intent to treat employers and students fairly. They are:

- Principle 1: Practice reasonable, responsible, and transparent behavior.
- Principle 2: Act without bias.
- Principle 3: Ensure equitable access.
- Principle 4: Comply with laws.
- Principle 5: Protect confidentiality.

## Addendum #2

### Internships

#### **NACE Criteria for an Experience to Be Defined as an Internship:**

All internships, whether paid or unpaid, credited or un-credited, shall meet the following criteria:

1. The experience must be an extension of the classroom: a learning experience that provides for applying the knowledge gained in the classroom. It must not be simply to advance the operations of the employer or be the work that a regular employee would routinely perform.
2. The skills or knowledge learned must be transferable to other employment settings.
3. The experience has a defined beginning and end, and a job description with desired qualifications.
4. There are clearly defined learning objectives/goals related to the professional goals of the student's academic coursework.
5. There is supervision by a professional with expertise and educational and/or professional background in the field of the experience.
6. There is routine feedback by the experienced supervisor.
7. There are resources, equipment, and facilities provided by the host employer that support learning objectives/goals

#### **Employer Guidelines for Unpaid Internships**

Since many students focus their search on paid internship positions out of necessity, offering paid internships often results in a larger, more diverse and qualified pool of applicants. Therefore, employing organizations are encouraged to pay interns whenever possible.

However, employers desiring to offer an unpaid internship should be familiar with the U.S. Department of Labor's Fair Labor Standards Act (#71: Internship Programs Under the Fair Labor Standards Act). Act #71 requires "for-profit" employers to pay employees for their work. Interns and students, however, may not be "employees" under the FLSA—in which case the FLSA does not require compensation for their work.

#### **The Test for Unpaid Interns and Students**

Courts have used the "primary beneficiary test" to determine whether an intern or student is, in fact, an employee under the FLSA. In short, this test allows courts to examine the "economic reality" of the intern-employer relationship to determine which party is the "primary beneficiary" of the relationship. Courts have identified the following seven factors as part of the test:

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.

Courts have described the "primary beneficiary test" as a flexible test, and no single factor is determinative. Accordingly, whether an intern or student is an employee under the FLSA necessarily depends on the unique circumstances of each case.

If analysis of these circumstances reveals that an intern or student is actually an employee, then he or she is entitled to both minimum wage and overtime pay under the FLSA. On the other hand, if the analysis confirms that the intern or student is not an employee, then he or she is not entitled to either minimum wage or overtime pay under the FLSA.