

Policies Regarding Employer Recruitment Practices

Employers who recruit at Northern Virginia Community College (NOVA) must comply with all Federal, State and Local legislation and College policies, including, but not limited to, the following policies that are in place to ensure NOVA students and alumni are treated fairly and are recruited for viable positions.

[NACE Principals for Ethical Professional Practice](#)

[Equal Opportunity and Nondiscrimination](#)

[Family Educational Rights and Privacy Act \(FERPA\)](#)

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NACE Principals for Ethical Professional Practice

As a member school of the National Association of Colleges and Employers (NACE), our career services team adheres to the [\(NACE\) Principles for Ethical Professional Practice](#) and expects employers to as well.

Equal Opportunity and Nondiscrimination

Northern Virginia Community College is committed to a policy of [nondiscrimination in employment and educational opportunity](#). This policy specifically prohibits discrimination on the basis of race, sex (including pregnancy), color, national origin, religion, sexual orientation, gender identity or expression, age, political affiliation, family medical history or genetic information, or against otherwise qualified persons with disabilities in educational and employment opportunities, programs and activities. The policy permits appropriate employment preferences for veterans and specifically prohibits discrimination against veterans. Harassment of an individual or group on the basis of any of these factors has no place in a learning or work environment and is prohibited.

NOVA's Career Services will not advertise positions or sponsor organizations that restrict consideration to specific populations based on race, color, religion, sex, or national origin. NOVA's Career Services will advertise opportunities that prefer specific populations if they will also consider other students or have opportunities open to all interested students.

Family Educational Rights and Privacy Act (FERPA)

Employers must comply with the legal obligations of recruiters, and maintaining the confidentiality of student data as outlined in the [Family Educational Rights and Privacy Act \(FERPA\)](#). Employers who receive student resumes and educational information may use it only for the original purpose for which disclosure was granted. Thus, employers may not transmit (or re-disclose) student information to any other employer or third party, nor to others within the employing organization for any purpose other than employment purposes. If an organization improperly re-discloses student records, federal law prohibits that party from obtaining student records for a period of at least five years.

The Fair Labor Standards Act

Particularly if your company or organization has legal questions regarding whether or not an internship position should be paid, we suggest consulting the U.S. Department of Labor issued [Fact Sheet #71: Internship Programs under the Fair Labor Standards Act](#). This fact sheet provides general information to help determine whether interns and students working for "for-profit" employers are entitled to minimum wages and overtime pay under the Fair Labor Standards Act (FLSA).

Anti-discrimination provision of the Immigration and Nationality Act

Employers must abide by the Department of Justice's Immigration and Nationality Act prohibiting unfair immigration-related employment practices ([8 U.S.C. § 1324b\(a\)\(1\)\(B\)](#)). We highly recommend reviewing the guidelines from the Department of Justice for [Best Practices for Recruiting and Hiring Workers](#).

Career Connection Accounts

Employers that wish to fill full-time or part-time positions or internships are eligible to create an account and post their opportunities in NOVA's [Career Connection](#). To create a NOVA Career Connection account, all employers are required to provide a company website, a company email address, and a business address. We will not approve employers without a functioning company website, that use a non-business email address (*@gmail.com, @yahoo.com, @hotmail.com, etc.*), or that use a residential business address, including but not limited to houses, apartments, condos, or PO boxes. NOVA Career Services reserves the right to share employer information listed in NOVA's Career Connection database with NOVA career counselors and other NOVA employees focused on student employment. NOVA acts only as an intermediary between employers and candidates searching for employment opportunities and does not vet or screen candidates on behalf of employers.

NOVA's Career Services will not approve employers for recruitment activities if:

- The organization is unable or unwilling to provide business contact information in Career Connection with contact name, business address, phone number, website and business email address (*non-business email addresses such as @gmail.com, @yahoo.com, @hotmail.com, etc. are not accepted*)
- The organization is unable or unwilling to provide written documentation of business registration with the state's governing agency (State Corporation Commission, Secretary of State, Division of Corporations, IRS tax exemption, etc.)

Job Postings

NOVA Career Services does not support the following types of employment:

- Positions that require an initial payment or investment with the organization including, but not limited to, an application fee; the requirement to attend unpaid orientation or training sessions; direct payment of a fixed fee; payment to attend orientation or training sessions; and/or purchase, rent, or place a deposit on a starter kit, sales kit, samples, or presentation supplies
- Positions that involve on-campus solicitation, posting of materials, or sale of products and services
- Positions (or employers) producing, testing, distributing, or otherwise promoting products related to the cannabis industry, in order to comply with both state and federal law
- Commission-only employment
- Independent contractor positions
- Pyramid or multi-level employers
- Door-to-door sales positions
- Personal services (Babysitting, in-home tutor, dog walker, etc.)
- Volunteer positions

Internships

Internships offered by for-profit companies must be paid, offering an hourly wage or stipend. Non-profit organizations or government agencies may offer unpaid internships.

Internship opportunities are posted in Career Connection. Students may participate in internships for academic credit or do so independently for the experience. Employers hosting students earning credit will complete a Coordinated Internship Agreement packet. Internships for credit will coincide with the academic term (Fall, Spring and Summer). Deadlines vary as they are tied to the student getting approvals for the internship program and registering for classes in accordance with the academic calendar each term. It is the student's responsibility to work with faculty and their department to get the course approved for credit and get themselves registered for credit. Non-credit internships may be more flexible in terms of start and end dates, but should also be for a limited time in duration and provide direct mentoring and supervision. Non-credit internships do not require an agreement with the College.

Third Party Recruiters

Third Party Recruiters are defined as organizations, including temporary employment agencies, which recruit candidates for temporary, part time, or full-time employment opportunities for other organizations rather than for their own organization's internal hiring needs. Third Party Recruiters shall agree in writing to the terms of a Third Party Recruiter Agreement, as provided by NOVA. Agencies will follow EEO standards in their recruiting activities. Third-party recruiters who charge a fee to candidates will not be allowed to participate in any NOVA career activities. Agencies will also disclose to students the name of the client that the third party recruiter is representing and to whom the student's credentials will be disclosed. Short term employment opportunities must be intended to exceed a duration of thirty days to be posted on NOVA's online career database.

Start-ups

Start-ups must have progressed sufficiently in their business development process so that they can provide a company name, valid business address, and functioning website/email address. Start-ups must be able to present the necessary business licenses if requested.

Internationally-Based Companies

Companies with no U.S. locations and third party recruiters (in addition to the above requirements) who represent such companies must provide NOVA's Career Services two reference letters from two different career services professionals representing regionally accredited U.S. colleges or universities before they will be granted access to NOVA students and alumni. All postings must contain English translation, including the company's website.

Violation of Recruitment Policies

NOVA's Career Services reserves the right to deny recruiting privileges to any organization for any reason. Failure to adhere to our recruitment policies or to provide the requested business information will result in immediate suspension of recruitment activities, including removal of any active job postings within Career Connection. NOVA's Career Services reserves the right to investigate any student, alumni, staff or faculty complaint(s) about employers recruiting at NOVA. If NOVA determines that the complaint is justified, that employer will lose their access to NOVA students and alumni. NOVA may also report the organization to appropriate agencies. NOVA will provide written notification to the employer if an investigation is being conducted.

*NOTE: These policies are subject to change and will be updated as needed without further notice from time to time at the sole discretion of the College. Notice of amendments will be posted to the College's website.