



POLICY: 6Hx28:3A-08

Responsible Executive: Executive Vice President, Administrative Services

Policy Contacts: Chief Human Resources Officer

Specific Authority: 1001.64, F.S.

Law Implemented: 1001.64, F.S.; Fair Labor Standards Act

Effective Date: 10-16-2025

Date of Last Policy Review: 10-16-2025

Unpaid Internships and Volunteers

Policy Statement:

- I. Valencia College (“College”) provides unpaid internships and volunteer opportunities for eligible individuals.
 - A. Unpaid Internships: Students enrolled in an internship program or course (generally at an institution of higher education) have an opportunity to engage in an unpaid, practical career-related experience at the College where learning is the primary objective.
 1. Unpaid internships may be made available for eligible College students or eligible students from other higher educational institutions and these internships shall be conducted in alignment with College policies and applicable federal, state, and local laws and regulations.
 - B. Volunteers: Eligible individuals may volunteer their time and services in areas of need at the College. Volunteers are individuals who perform services directly related to the activities of the College for their own benefit, to support the humanitarian, educational, charitable, or public service activities of the College, or to gain experience in specific endeavors.
 1. Volunteers may include but are not limited to members of the public, current employees, and/or students.
 2. There is no employment relationship between the College and the volunteer, and volunteers are not covered by the Fair Labor Standards Act. Volunteers thus perform services freely and without coercion, direct or implied, and without promise, expectation or receipt of any compensation, deferred payment, future employment, or any other tangible benefit.

- II. Unpaid internships and volunteer opportunities are expected to abide by applicable College policies and external regulations that govern their actions including, but not limited to ethical behavior, confidentiality, financial responsibility, drug/alcohol use, health and safety, maintenance of protected health information, non-discrimination/harassment, conflicts of interest, and appropriate use of technology resources.
- III. To the extent that participants in unpaid internships and/or volunteer opportunities at the College may require access to student “education records” in the performance of tasks associated with these roles, the College deems them to be “school officials,” as each of these terms is defined in applicable state and federal laws and regulations.
- IV. The College President or designee(s) shall have the authority to adopt and amend procedures to implement this policy.
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Policy History:

Adopted 10-16-2025; Combines/Repeals 6Hx28: 3A-09

Related Documents/Policies:

[Speaker Agreement](#)

U.S. Department of Labor Fact Sheet #71 “Internship Programs under the Fair Labor Standards Act.”

Unpaid Internship Application (Contact Organizational Development and Human Resources)

Volunteer Application (Contact Organizational Development and Human Resources)

Procedures:

I. Unpaid Internships

A. Unpaid Internship Eligibility Criteria and Conditions of Participation

1. Valencia College supports College students and students from other higher educational institutions by providing unpaid internship opportunities at Valencia College, which are required by the academic program at the institution in which they are currently enrolled (“Home Institution”).
2. In accordance with the United States Department of Labor Wage and Hour Division standards for internship programs under the Fair Labor Standards Act (FLSA), unpaid internships at Valencia College must meet the following criteria, the extent to which:
 - a. There is no employment relationship between the College and the unpaid intern. The unpaid intern and the College clearly understand that there is no expectation of compensation. Therefore, the unpaid intern is:
 - i. not entitled to either minimum wage or overtime pay under the FLSA;

- ii. not covered by or eligible to receive any College health, accident, disability, workers' compensation benefits or other such benefits; and
 - iii. not eligible for unemployment compensation.
- b. The unpaid 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 unpaid internship is tied to the unpaid intern's formal education program by integrated coursework or the receipt of academic credit;
- d. The unpaid internship accommodates the unpaid intern's academic commitments by corresponding to the academic calendar;
- e. The unpaid internship's duration is limited to the period in which the unpaid internship provides the unpaid intern with beneficial learning;
- f. The unpaid internship complements, rather than displaces, the work of paid employees while providing significant educational benefits to the unpaid intern; and
- g. The unpaid intern and the College understand that the unpaid internship is conducted without expectation of or entitlement to a paid job at the College at the conclusion of the unpaid internship.

B. Unpaid Internship Approval Process

1. Valencia College students: Currently enrolled Valencia College students seeking an unpaid internship/training opportunity for academic credit related to their coursework at the College, the student must contact a representative from the Internship and Workforce Services (IWS) Office for additional information about the process, to express interest, to explore internship opportunities, and/or complete the appropriate internship application for review and approval, as appropriate. For campus locations and representatives of the IWS office, see <https://valenciacollege.edu/students/internship/students/internships.php>.
2. Students from other higher educational institutions: College departments interested in engaging unpaid student interns from academic institutions outside of Valencia College must contact a representative from Organizational Development and Human Resources (ODHR) at 407-582-4748 (HR4U) or HR4U@valenciacollege.edu for assistance in establishing the unpaid internship and ensuring the unpaid internship academic plan meets the College's required criteria.
 - a. The department wanting to host an unpaid intern is responsible for collecting all pertinent documentation from the potential student intern on the parameters and length of the unpaid internship program, field of study, learning objectives, and expected outcomes as defined by their Home Institution. The hosting department must request and complete the Unpaid Internship Application, which includes:

- i. Providing details about the internship parameters collected from the potential student intern and their Home Institution;
 - ii. Experience the host department will provide;
 - iii. Start and end date of the internship opportunity; and
 - iv. Signatures of acknowledgement from both the department host contact and potential student intern.
- b. A College employee who is a member of the same family or head of household of an unpaid intern may not:
 - i. recommend or make decisions about the placement of an eligible unpaid student intern at the College; or
 - ii. supervise the student intern directly or indirectly as this may create a perceived or actual conflict of interest.
- c. ODHR shall evaluate the information provided in the application and determine if the unpaid internship experience is permissible under this College policy and procedure criteria. If approved, ODHR will coordinate with the prospective intern to complete a criminal background check. ODHR will notify the department if the unpaid intern is cleared to begin the unpaid internship.

C. Unpaid Internship Responsibilities and Expectations

1. Valencia College departments and external employers approved to receive unpaid interns are responsible for providing appropriate onboarding, training (e.g., FERPA, confidentiality, as appropriate), supervision, direction to the intern, providing comprehensive feedback during and at the conclusion of the unpaid internship, and ensuring the unpaid intern complies with College policies, external employer policies (as applicable), and applicable laws.
2. Unpaid interns may not:
 - a. participate in training with operating heavy equipment or motor vehicles on behalf of the College;
 - b. enter into any contract or agreement on behalf of the College and/or representing themselves as a College employee; or
 - c. participate in any other activity deemed inappropriate by the College in its sole discretion.
3. Current College employees: Exempt and non-exempt College employees may participate in an unpaid internship either with a department other than their employing department or with an external employer. Specifically:
 - a. Exempt employees may participate in an unpaid internship outside of their regular duties if the unpaid internship does not interfere with their primary job

responsibilities.

- b. Non-exempt employees may participate in an unpaid internship within the College outside of their regular duties and regularly scheduled work hours as determined as appropriate by the College and in compliance with applicable laws and regulations.
- c. With supervisor approval, schedule adjustments or accrued vacation or personal leave, as applicable, may be authorized to accommodate an unpaid internship opportunity that may fall within an employee's regular work hours.

Note: Any College employee approved for an unpaid internship is not eligible for wages/salary, workers' compensation, or unemployment compensation from the College or the external employer during the hour(s) they are serving as an unpaid intern.

II. College Volunteers

A. College Volunteer Eligibility Criteria

1. College volunteer opportunities are available, but are not limited to, members of the public, current employees, and/or current students at the College or other educational institutions.
2. Prospective volunteer individuals and activities must meet the following criteria to be approved to engage as a College volunteer:
 - a. The volunteer must be eighteen (18) years of age or older at the time of the volunteer activity.
 - b. The activity(ies) engaged in by a volunteer must constitute a bona fide effort to volunteer for a charitable, humanitarian, or public service purpose or for the benefit of their personal or professional experience.
 - c. The activity(ies) engaged in by a volunteer are voluntary, rendered without compensation (e.g., salary, stipend, gift card) or benefits (e.g., health, unemployment, workers' compensation), and occurring on a part-time basis, periodic basis, or otherwise will be of limited duration.
 - i. The College may reimburse a volunteer for pre-approved actual and reasonable expenses incurred arising from the engagement of volunteer activities following the standard College reimbursement procedures.
3. Volunteer activities must enhance and further support the work of the College. A volunteer must not be utilized in ways that would or could displace or replace a College employee in the performance of their normal duties.

B. College Volunteer Approval Process

1. A department that has identified a prospective College volunteer shall contact Organizational Development and Human Resources (ODHR) at 407-582-4748 (HR4U) or HR4U@valenciacollege.edu to request and complete a Volunteer Application and a release of liability form that will need to be signed by the volunteer and the volunteer supervisor. The Volunteer Application will require the start and end date of the

volunteer opportunity along with a description of the volunteer activity(ies) to be performed.

- a. A College employee who is a member of the same family or household of a College volunteer may not:
 - i. recommend or make decisions about the placement of that volunteer at the College; or
 - ii. supervise that volunteer directly or indirectly as this may create a perceived or actual conflict of interest.
- b. ODHR shall evaluate the information and determine if the volunteer assignment is permissible in accordance with procedures as outlined in this policy. The department shall be notified the outcome of the request. If approved, ODHR will work with the prospective College volunteer to arrange a criminal background check.
- c. All volunteer arrangements require a completed Volunteer Application, release of liability form, and criminal background check on file prior to beginning any volunteer activity(ies). ODHR will notify the department if the volunteer is cleared to begin the volunteer arrangement.
- d. In the event a College volunteer wants to renew or serve a different department in a new activity(ies), the new department is required to seek authorization from ODHR for the new, renewal, or additional placement of the College volunteer.
- e. Activities Not Requiring an Approval Process: Some activities generally do not require a completed volunteer application or criminal background check including, but not limited to:
 - i. Advisory council participation
 - ii. Public/guest speakers (must complete Speaker Agreement through the Contracts and Records Department)
 - iii. Participation in volunteer committees
 - iv. Activities coordinated through Student Development (subject to specific established procedures)
 - v. Tasks and activities performed immediately before, during and immediately after performances, concerts, gallery shows, etc.
 - vi. One-time special events or activities

Note: Departments should contact ODHR at 407-582-4748 (HR4U) or HR4U@valenciacollege.edu for evaluation and guidance on whether any proposed activity(ies) may or may not fall under the criteria listed in this section.

C. College Volunteer Responsibilities and Expectations

1. The College department in which the volunteer is providing their time and services will

be responsible for:

- a. identifying volunteer services/assignments, timeframe of the volunteer opportunity, and all coordination of any required documentation.
 - b. providing appropriate onboarding, training (e.g., FERPA, confidentiality, as appropriate), supervision, direction to the volunteer, and ensuring the volunteer complies with College policies and applicable laws; and
 - c. confirm with ODHR when the volunteer assignment has been completed.
2. Current College Employees: Exempt and non-exempt College employees may volunteer with a College department other than their employing department. Specifically:
- a. Exempt employees may volunteer for activities outside of their regular duties and the volunteer opportunity must not interfere with their primary job responsibilities.
 - b. Non-exempt employees may volunteer for activities outside of their regular duties and regular scheduled work hours.
 - c. With documented supervisor approval, schedule adjustments or accrued vacation or personal leave, as applicable, may be authorized to accommodate a volunteer opportunity that may fall within an employee's regular work hours.
 - d. Volunteer positions are at the discretion of the host supervisor, are not subject to compensation, and can be altered should the volunteer activity disrupt or negatively impact the workplace.
3. College volunteers may not provide the following services while performing in their role as a volunteer:
- a. Operating heavy equipment or College vehicles on behalf of the College;
 - b. Working with or exposure to hazardous materials or potentially infectious agents;
 - c. Entering into any contract or agreement on behalf of the College and/or representing themselves as a College employee; and/or
 - d. Any other activity deemed inappropriate by the College in its sole discretion.

III. The College, or external employer (as applicable), may end an unpaid internship or volunteer's service (as applicable) at any time, at its convenience and in its sole discretion, without exception and without notice. Likewise, the unpaid intern or volunteer (as applicable) may also end their unpaid intern or volunteer arrangement at any time. At separation and as applicable, the unpaid intern or volunteer is required to turn in any College or external employer issued property to their assigned department or IWS Office (as appropriate).

Procedure History:

Adopted 10-16-2025

Related Documents/Procedures:

Date of Last Procedure Review: 10-16-2025

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