



## Minors in Laboratories Or Other Potentially Hazardous Areas Policy

*Volume: Office of Administration*

*Responsible Office: Environmental Health & Safety*

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### Policy Statement

Persons under 18 years of age are prohibited from entering laboratory areas or other areas where potentially hazardous materials or conditions may be present (e.g., laboratories) except when:

1. Such entry is part of an escorted scheduled tour or,
2. Such entry has been pre-authorized in writing by the Department Chair on a per visit basis and approved by the Associate Vice President (AVP), EH&S or,
3. Such entry is by a student enrolled at GHSU or,
4. Such entry is part of an institutionally sponsored educational program such as the SEEP program or,
5. Such entry is approved by the AVP, Environmental Health and Safety Division in accordance with this policy.

### Reason For Policy

All accepted Occupational Health and Safety exposure and risk assessments are based on the risks to healthy human adults and do not account for differential effects on immature bodies/systems. Because of their biological, social, and maturational characteristics, minors have unique and substantial risks for work-related injuries and illnesses which must be assessed and addressed prior to permitting a minor to enter laboratory areas or other areas where potentially hazardous materials or conditions may be present. The presence of minors must also comply with all Federal and State regulations and Institutional Policies and Procedures.

### Entities Affected By This Policy

This policy affects all units, divisions and subsidiaries of Georgia Health Sciences University who wish to allow minors to enter laboratories or any other GHSU area in which potentially hazardous materials or conditions may be present.

### Who Should Read This Policy

All GHSU faculty and administrative personnel who are considering allowing persons under the age of 18 to enter any laboratory or other GHSU area in which potentially hazardous materials or conditions may be present.

### Contacts

Contact	Phone	e-mail/URL
Associate Vice President, Environmental Health and Safety	706-721-9826	<a href="http://www.georgiahealth.edu/services/ehs/">http://www.georgiahealth.edu/services/ehs/</a>

### Printable Version of This Policy

<http://www.mcg.edu/Policies/4002.html>

**Related GHSU Policies:**

Institutional Biosafety Committee

<http://policy.georgiahealth.edu/2010/09/22/institutional-biosafety-committee/>

Accident Injury Reporting

<http://policy.georgiahealth.edu/2010/08/24/accident-injury-reporting-policy/>

Workers' Compensation/ On-The-Job Injuries

<http://policy.georgiahealth.edu/2010/09/22/workers%E2%80%99-compensationon-the-job-injuries-policy/>

**Related Documents**

Biological Safety Guide:

<http://www.georgiahealth.edu/services/ehs/biosafe/PDFs/bioguidejun08.pdf>

Chemical Safety Guide:

<http://www.georgiahealth.edu/services/ehs/chemsafe/ChemSafGuide4-13-11.pdf>

Radiation Safety Guide:

<http://www.georgiahealth.edu/services/ehs/radsafe/rmanual1/documents/RSG.pdf>

**Definitions**

These definitions apply to these terms as they are used in this policy:

**ABSL-2** Animal Biosafety Level 2

**Biological Agent** An infectious or potentially infectious biological material

**CRRRI** Chesapeake Research Review, Inc.

**CDC** Center for Disease Control

**BMBL** Biosafety in Microbiological and Biomedical Laboratories, a CDC document

**NIH** National Institutes of Health

**Chemical Agent** A potentially harmful chemical

**EH&S** Environmental Health and Safety Division

**HAC** Human Assurance Committee

**IBC** Institutional Biosafety Committee

**IRB** Institutional Review Board

**IACUC** Institutional Animal Care and Use Committee

**LAS** Lab animal services

**OHRP** Office of Human Research Protections

**OSHA** Occupational Safety and Health Administration

**PI** Principal Investigator

**Minor** A person, 16 or 17 years of age

**NIOSH** National Institute for Occupational Health and Safety

**SEEP** Student Educational Enrichment Program

**SOP** Standard Operating Procedure

**Toxin** A poisonous substance produced by living cells or organisms.

**WHO** World Health Organization

## Overview

Any laboratory could be considered a potentially hazardous area, whether these hazards are presented by biological materials, chemicals, or radioactive substances. Few studies exist which adequately characterize potential differential health consequences of exposure of minors to these hazards.

For this reason, the GHSU Radiation Safety Guide, Biological Safety Guide, and the Chemical Safety Guide all prohibit persons under the age of 18 from entering laboratory areas or other areas where hazardous materials or conditions may be present. Exceptions to such entry are when:

1. Such entry is part of an escorted, scheduled tour or,
2. Such entry has been pre-authorized in writing by the Department Chair on a per visit basis and approved by the AVP, EH&S or,
3. Such entry is by a student enrolled at GHSU or,
4. Such entry is part of an institutionally sponsored educational program such as the SEEP program or,
5. Such entry is approved by the AVP, Environmental Health and Safety Division in accordance with this policy.

While GHSU recognizes that volunteering or working within a laboratory can provide a valuable learning experience, minors under the age of 18 years are restricted from being in laboratories unless special provisions are made and followed to address the following concerns:

v Federal law explicitly prohibits any minor under the age of 18 from working in areas where exposure to radiation may occur or where explosive materials may be stored or used. These prohibitions limit the GHSU laboratories in which a minor will be permitted to enter. In addition, because of the increased risk of illness or injury, GHSU has determined that minors will not be permitted in any non-human primate or ABSL-2 areas or in BSL-3 laboratories. Minors also will not be permitted to transport or ship hazardous materials outside of the laboratory.

v Risk communication and the comprehension of those risks and mitigation methods are important safety measures within the biomedical laboratory. Comprehension of these risks may require a certain level of educational background and maturity to understand. For this reason, only minors 16 years of age or older with an educational background to comprehend basic biological and chemical concepts sufficient to understand the safety issues should be permitted within the laboratory.

v The signed consent form to allow minors to enter laboratories requires that the parent or guardian be fully informed of the risks faced by their child in these areas. For this reason, the consent process must detail the risks to which the minor may be exposed and steps that will be taken to minimize these risks.

v Because of a minor's lesser degree of maturity, knowledge, and familiarity with a potentially hazardous laboratory environment, constant and direct supervision of the minor in a laboratory is required to ensure the minor's safety. This means activities engaged in by the minor within the laboratory must be closely monitored. This requires physical proximity (*i.e.* within the line of sight of the supervisor) and attentiveness of the supervisor.

v An evaluation and risk assessment by a qualified medical professional is important for those whose health status may differ from the "healthy human adult" standard—such as a minor (as described in the CDC/NIH BMBL, NIH Guidelines, OSHA and GA State Dept. of Labor standards).

v Health care provisions must be made for the minor in case of incident, exposure, or illness which may result from participating in laboratory activities.

### Process

1. The PI must complete an *Application for Authorization of a Minor to Work or Volunteer in a Laboratory or Other Hazardous Area* and submit the form to EH&S for review and approval. This form will document adherence to the following issues:
  1. Minors under the age of 16 years will not be permitted into the laboratory.
  2. Minors will not be permitted in areas which may result in exposure to radioactive substances or ionizing radiation.
  3. Minors will not be permitted in areas in which explosives or articles containing explosive components are present or stored.
  4. Minors will require a signed health letter of clearance from a licensed health care provider indicating any health concerns which would present an additional risk to the minor while working in a research laboratory with biohazardous or chemical agents.
  5. Minors will not be permitted in any laboratory area not documented by the PI on the *Application for Authorization of a Minor to Work or Volunteer in a Laboratory or Other Hazardous Area*.
  6. Minors will not be permitted in laboratories unless direct (i.e. line of sight) supervision is maintained as detailed in the Application.
  7. The minor will adhere to the same safety standards as all other laboratory members, including completion of all required training modules.
1. The PI must adhere to all GHSU Safety or Compliance Committee (IBC, IRB, ICC, IACUC, HAC) policies and procedures, including the submission and approval by the respective committees or their designees of protocol amendments to add the minor to their protocols.
2. The PI must receive a signed *Consent For Minor's Presence In Laboratory* form (*Consent Form*) from the parent/guardian of the minor and submit a copy to EH&S. Informed consent of the parent(s) or guardian(s) of the minor who will work or volunteer in the laboratory will document the risks and mitigation actions to reduce those risks.
  1. The PI or supervisor will discuss with the parent/guardian the hazards present within the laboratory that the minor may be working with.
  2. The PI or supervisor must describe the safety procedures that are present to minimize their minor's exposure risks. These include a discussion and documentation of any precautionary and emergency medical provisions that must be provided to the minor.
  3. The PI/Supervisor will give the parents/guardians and minor sufficient time to read the *Consent Form*, a copy of the PI's *Application for Authorization of a Minor to Work or Volunteer in a Laboratory or Other Hazardous Area*, the *Potential Hazard and Risk Information Sheet*, and related institutional or laboratory SOPs to ensure that the parents'/guardians' and minor's questions have been answered before they sign the *Consent Form*.
  4. After the parents/guardians and minor read and sign the *Consent Form*, the *Consent Form* should be attached to the *Application for Authorization of a Minor to Volunteer in a Laboratory or Other Hazardous Area* and sent to the AVP, EH&S for review and approval.
  5. The parents/guardians and minor must be given a copy of the *Consent Form*, the *Potential Hazard and Risk Information Sheet*, and the *Application for Authorization of a Minor to work in a Laboratory or Other Hazardous Area*. The original signed *Consent Form* should be kept in a secure location in the principal investigator's/supervisor's area.
  6. Parents/guardians and minor must be re-consented when there is a change in the risk—including different materials, operations, or locations which would increase the risks to the minor.
1. The minor must complete all safety training requirements required of any new laboratory staff prior to initiation of work within the laboratory.

Failure to comply with any provision detailed on the *Application for Authorization of a Minor to Work or Volunteer in a Laboratory or Other Hazardous Area*, Institutional Policies, or governmental regulations will result in termination of authorization for the minor to enter the laboratory.

### Responsibilities

The responsibilities that each party has in connection with the Minors in Laboratories or Other Potentially Hazardous Areas Policy, are:

Principal Investigators (PI) or Supervisors who wish to authorize a minor to work in a laboratory or other potentially hazardous area

- 1) Submit a completed *Application for Authorization of a Minor to Work or Volunteer in a Laboratory or Other Hazardous Area* to EH&S for review and approval to include:
  - a) A signed *Consent For Minor's Presence In Laboratory* form as described in the policy.
  - b) A Potential Hazard and Risk Information Sheet.
  - c) Verification of approval of amendments for the addition of the minor to the protocol from the applicable Compliance Committees (IBC, ICC, IACUC, HAC).
  - d)

	Certification that the minor has taken all required training.e) A signed Volunteer Agreement Form, if applicable.
Designated direct supervisor of the minor in the laboratory or hazardous area (PI or their designee)	1) Provide direct line of sight supervision of the minor when the minor is in the laboratory.2) Provide training on the specific biological, chemical, and equipment hazards within the laboratory.3) Provide training on the proper use of eyewash stations and safety showers.4) Ensure that the required personal protective equipment as identified on the <i>Application for Authorization of a Minor to Work or Volunteer in a Laboratory or Other Hazardous Area</i> is worn by the minor at all times when in the laboratory.
Minors who enter Laboratory or other potentially hazardous areas	1) Follow all instructions of your direct supervisor and Principal Investigator.2) Wear all required personal protective equipment.
Environmental Health and Safety (EH&S) Division	1) Verify that the <i>Application for Authorization of a Minor to Work or Volunteer in a Laboratory or Other Hazardous Area</i> is complete and that all associated information, approvals, training, and waivers are in place.2) Resolve any safety issues with the PI, or if the issues cannot be resolved with the PI, bring the issue before the respective safety committee for their recommendation.3) Provide didactic training.

## Forms

Application for Authorization of a Minor to Volunteer in a Laboratory or Other Hazardous Area.

<http://www.georgiahealth.edu/services/ehs/Forms/minorsinlabform.doc>

Parental Consent For Minor's Presence in Laboratories

<http://www.georgiahealth.edu/services/ehs/Forms/parentalconsentformreviewedbylegal.doc>

GHSU Potential Hazard and Risk Information Sheet

<http://www.georgiahealth.edu/services/ehs/Forms/potentialhazardtable.pdf>

GHSU Volunteer Agreement

<http://www.georgiahealth.edu/services/ehs/Forms/volunteeragreement.doc>

Biological Safety Protocol (BSP) Application Forms:

<http://www.georgiahealth.edu/research/ibc/apps.html>

Chemical Safety Protocol Application Forms:

Use of high hazard chemicals in laboratories

<http://www.georgiahealth.edu/services/ehs/chemsafe/PDF%20files/hihazapplch.pdf>

Animal Use Protocol (AUP) Application Forms:

<http://www.georgiahealth.edu/research/iacuc/aupforms.html>

Institutional Review Board (IRB) Application Forms:

<http://www.georgiahealth.edu/research/ohrp/irb/>

GHSU Human Assurance (HAC) Application Forms:

<http://www.georgiahealth.edu/research/iacuc/aupforms.html>

Chesapeake Research Review Inc. (CCRI) Application Forms:

[http://www.cirbi.net/CIRBI/Rooms/DisplayPages/LayoutInitial?Container=com.webbridge.entity.Entity\[OID\[AC482809EC03C442A46F2C8EEC4D75D3\]\]](http://www.cirbi.net/CIRBI/Rooms/DisplayPages/LayoutInitial?Container=com.webbridge.entity.Entity[OID[AC482809EC03C442A46F2C8EEC4D75D3]])

## Appendices

### GHSU Compliance Committees or Offices:

GHSU Institutional Biosafety Committee Web page:

<http://www.georgiahealth.edu/research/ibc/>

GHSU Institutional Animal Care and Use Committee (IACUC) web page:

<http://www.georgiahealth.edu/research/iacuc/>

GHSU Office of Human Research Protection (OHRP) web page:

<http://www.georgiahealth.edu/research/ohrp/>

### GHSU Offices:

#### Division of Environmental Health and Safety:

<http://www.georgiahealth.edu/services/ehs/>

Biological Safety Guide:

<http://www.georgiahealth.edu/services/ehs/biosafe/PDFs/bioguidejun08.pdf>

Chemical Safety Guide:

<http://www.georgiahealth.edu/services/ehs/chemsafe/ChemSafGuide4-13-11.pdf>

Radiation Safety Guide:

<http://www.georgiahealth.edu/services/ehs/radsafe/rmanual1/rindex.htm>

### For Animal Care and Use Issues:

Division of Laboratory Animal Services (LAS)

<http://www.georgiahealth.edu/research/animal/>

Institutional Animal Care and Use Committee (IACUC) Office

<http://www.georgiahealth.edu/research/iacuc/>

**For Human Research Issues:**

Office of Human Research Protection (OHRP)

<http://www.georgiahealth.edu/research/ohrp/>

**External Agencies**

**U.S. Department of Labor (USDOL) Occupational Safety and Health Administration (OSHA)**

Fair Labor Standards Act (FLSA) Title 29, Chapter V Code of Federal Regulations, Part 570 Child Labor Regulations, Order and Statements of Interpretation

[http://www.dol.gov/dol/allcfr/ESA/Title\\_29/Part\\_570/toc.htm](http://www.dol.gov/dol/allcfr/ESA/Title_29/Part_570/toc.htm)

Youth and Labor:

<http://www.dol.gov/dol/topic/youthlabor/agerequirements.htm>

Hazardous Jobs:

<http://www.dol.gov/dol/topic/youthlabor/hazardousjobs.htm>

**Georgia State Department of Labor Hazardous Occupations**

[http://www.dol.state.ga.us/em/cl\\_hazardous\\_occupations.htm](http://www.dol.state.ga.us/em/cl_hazardous_occupations.htm)

**Center for Disease Control (CDC), National Institute of Occupational Safety and Health (NIOSH)**

NIOSH Safety and Health Topic: Young Worker Safety and Health:

<http://www.cdc.gov/niosh/topics/youth/>

Recommendations to the U.S. Department of Labor for Changes to Hazardous Orders

<http://www.cdc.gov/niosh/docs/NIOSHRecsDOLHaz/default.html>

**CDC/NIH Biosafety in Microbiological and Biomedical Laboratories (BMBL)**

<http://www.cdc.gov/od/ohs/biosfty/bmb15/bmb15toc.htm>

**Occupational Safety and Health Administration (OSHA) Bloodborne Pathogens Standard**

[http://www.osha.gov/pls/oshaweb/owadisp.show\\_document?p\\_table=STANDARDS&p\\_id=10051](http://www.osha.gov/pls/oshaweb/owadisp.show_document?p_table=STANDARDS&p_id=10051)

**Official Code of Georgia (OCGA) Bloodborne Pathogens Standard (O.C.G.A. § 31-12-13)**

<http://www.lexis-nexis.com/hottopics/gacode/>

**National Institutes of Health (NIH) Grants Policy Statement**

[http://grants.nih.gov/grants/policy/nihgps\\_2003/index.htm](http://grants.nih.gov/grants/policy/nihgps_2003/index.htm)

**National Institutes of Health (NIH) Guidelines for Research with Recombinant DNA Materials**

[http://www4.od.nih.gov/oba/rac/guidelines\\_02/NIH\\_Gdlnes\\_Ink\\_2002z.pdf](http://www4.od.nih.gov/oba/rac/guidelines_02/NIH_Gdlnes_Ink_2002z.pdf)

**World Health Organization (WHO) Biosafety Guidelines**

<http://www.who.int/csr/resources/publications/biosafety/en/Biosafety7.pdf>

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