
POLICY

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Title: Minors in Laboratories

Policy Statement

In keeping with the UVM mission of education and outreach, it is appropriate for persons under the age of eighteen years to occasionally enter research laboratories for educational purposes. Because the Nuclear Regulatory Commission (NRC) restricts the amount of radiation exposure that minors can receive and because there are a wide variety of chemical and biological hazards associated with laboratory work, it is necessary to establish requirements for the appropriate supervision of minors in laboratory areas. These requirements are necessary to protect a child's health and safety and to prevent harm arising from a child's exposure to harmful agents or conditions.

Reason for the Policy

This policy helps maintain a safe workplace and provides guidance to comply with applicable safety regulations. It further clarifies existing radiation safety regulations at UVM and addresses the issue of minors in laboratories who handle or may be exposed to hazardous chemicals, biological materials, or radioactive materials.

Applicability of the Policy

This policy applies to all University of Vermont faculty, staff, students, visiting minors, and their sponsors.

Definitions

Minors: persons under 18 years of age. Note that the definition in this Policy is different than the definition in UVM's [Protection of Minors](#) Policy. This difference is intentional and necessary for compliance purposes.

Short Term: means up to two (2) days. Anything exceeding two days is not a short-term visit.

Procedures

In addition to these Laboratory-specific procedures, UVM personnel who work with minors must comply with UVM's Policy for [Protecting Minors \(pdf\)](#).

A. Age Group Restrictions:

1. Persons below twelve years of age: not allowed in laboratories.

2. Persons between ages twelve and fourteen: not permitted access to a hazardous chemical, biohazard, or radiation handling laboratory except for short-term (see definitions) group visits, such as a high school or middle school tour of a laboratory. Adequate adult supervision must be provided by the organization sponsoring the visit.
3. Persons between fourteen and eighteen: are permitted access to hazardous chemical, biological and radiation handling laboratories for both short-term and extended visits for education-related reasons.

B. Training:

1. Persons under twelve: are not allowed in laboratories.
2. Persons between ages twelve and eighteen: must receive appropriate lab safety training and be directly supervised by the investigator or their designee. If handling pathogens or rDNA, the investigator must add the minor's name to the personnel list in the IBC protocol and provide specific training on the pathogen work. The investigator is responsible for updating any and all applicable protocols to include the minor's name prior to allowing that minor to conduct work on the protocol (IACUC, IRB, IBC, etc.).

Note: If the person is expected to use radioactive materials, they are required to become a certified radiation handler by successfully completing a written examination administered by the Radiation Safety Office (RSO).

C. Notification & Compliance Requirements:

The Department of Risk Management & Safety (RMS) must be notified at least 2 weeks prior to the visit in order to review necessary training or oversight when access is provided to organized groups.

- Researchers working with outside organizations that bring groups of minors must complete the "MOU with outside organizations bringing minors to campus labs."
- Researchers working with individual minors must complete the "Minors in Lab permission form."

The investigator responsible for the laboratory hosting the visit must ensure compliance with all safety policies and regulations. If appropriate, a radiation film badge must be worn. The NRC limits persons under eighteen years of age to 10% of the exposure to those eighteen years of age and older. The investigator is also responsible to ensure that any visitors handling hazardous materials receive all the appropriate on-line, classroom and hands-on lab safety training. The investigator, or designee, must be present in the lab during visits.

D. Areas Affected

1. All laboratories are considered hazardous areas subject to this policy. "Laboratories" are rooms in which hazardous chemicals, radioactive materials, or biological materials are handled or stored.
2. Rooms with unusual hazards, such as machine rooms, electrical rooms, and equipment rooms, are considered "other hazardous areas." These hazards are addressed in the UVM [Protection of Minors Policy](#).
3. Hallways and offices adjacent to laboratories are not considered hazardous, but adult supervision is required for minors to be in those areas because of the potential for emergencies associated with laboratory work.
4. Specific areas requiring adult supervision under this policy include

- Bioresearch Complex
- Colchester Research Facility
- Delehanty
- Given Building
- Health Sciences Research Facility and Firestone Wing
- Hills Building
- Jeffords Hall
- Marsh Life Science Building & Carrigan Wing
- Perkins Hall
- Rowell Building
- RSENR labs at 705 Spear Street, Rubenstein Ecoscience Center and Aiken Building
- Stafford Building
- Discovery Hall
- Terrill Hall
- Votey Building
- Other areas as designated by a lab supervisor and/or Risk Management & Safety

E. **Enforcement**

As with all other policies affecting the use of hazardous materials, enforcement of this policy is the responsibility of the supervisor of the user of the hazardous material. The supervisor must exercise professional judgment to ensure that this policy is appropriately followed. Problems with compliance with the policy should be referred to the Dean of the College responsible for the building, to the Radiation Safety Committee or Institutional BioSafety Committee, or to the Department of Risk Management & Safety. Employees will not be retaliated against for raising compliance concerns to appropriate authorities.

Contacts

Questions concerning the daily operational interpretation of this policy should be directed to the following (in accordance with the policy elaboration and procedures):	
Title(s)/Department(s):	Contact Information:
Risk Management & Safety	(802) 656-3242 Risk Management & Safety
Environmental Health & Safety	Environmental Health & Safety
Radiation Safety Office	Radiation Safety Office

Forms/Flowcharts/Diagrams

- [Minors in Lab permission form](#)
- [MOU with outside organizations bringing minors to campus labs](#)

Related Documents/Policies

- [Laboratory Health and Safety Policy](#)
- [Protecting Minors Policy](#)

Regulatory References/Citations

- None

Training/Education

Training will be provided on an as-needed basis as determined by the Approval Authority or the Responsible Official.

About this Policy

Responsible Official:	Chief Safety and Compliance Officer	Approval Authority:	President
Policy Number:	V. 3.14.2	Effective Date:	August 16, 2016
Revision History:	<ul style="list-style-type: none">• V. 5.19.1/V. 4.1.20.1 effective January 25, 2007• V. 3.14.2 reaffirmed April 27, 2022		

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