Guidance for Minors in Research

There are inherent risks in allowing minors (i.e., individuals who are less than 18 years old) to visit, volunteer, or work in research laboratories. Laboratories may contain biological, chemical, and/or radiological hazards, as well as mechanical and electrical hazards from laboratory equipment. These present risk not only to those performing laboratory work, but also to those who are present within the laboratory while work is ongoing. Research settings are not limited to laboratories. Farm settings have many physical hazards (e.g., operating farm machinery, handling large animals), and at the agricultural research stations these are coupled with risks from exposure to biological agents (e.g., pathogens in large animal models) and chemicals (e.g., pesticides). Field research may also bring minors into contact with allergens or pathogens in wildlife. With minors, all of these risks are greatly amplified because the ability to understand risks and consequences is lower, the effects of accidental exposures can be greater, the skills necessary to handle hazardous materials have not yet been developed, and their response to exposures or other emergencies can be unpredictable.

1. Requirements for minors to enter research areas

Minors are not allowed in high risk areas. Access to some research areas may be prohibited due to reasons of safety, security, or regulatory compliance. In order for a minor to be granted access to a research area:

- **Permission from a parent or legal guardian is required in writing.** For assistance with release/authorization forms, please contact the Office of Risk Management at riskmgmt@bussvc.wisc.edu or 608-262-9082. Minors and their parents/guardians must be provided with information about the identity, associated hazards, recommended precautions, appropriate emergency response, and label information for all hazardous materials with which they are likely to come in contact.

- **A “consent to treat” form signed by a parent or legal guardian is required for a minor that is not a matriculated UW-Madison student to receive medical care through University Health Services.** This form may be required for minors that work or participate in a camp or outreach program on campus. For forms and assistance, please contact Occupational Medicine at EOH@uhs.wisc.edu or 608-265-5610.

- Minors must be supervised at all times by the PI or a trained staff member*. Minors are not allowed to be alone in a research area, and are not permitted to have their own building or room access. The person responsible for supervising the minor(s) must be physically with them while in the research area. A designee can be appointed, but the designee must also be fully trained to supervise minors.

*Please note that although research activities involving one-on-one training is an allowed exception to the UW-Madison “Two Deep” policy, there are additional stipulations: free access to the space must be maintained at all times, no window or door coverings that would restrict or eliminate visibility to the room are allowed, and doors must be left unlocked.
2. **Minors visiting laboratories**

In general, research laboratories are unsuitable for entry by children under the age of 10. Minors between the ages of 10 and 17 may visit laboratories for short-term observation, for example as part of a high school or middle school tour, when prior approval has been obtained in writing from the Department Chair, Institute Director, or equivalent authority. Department chairs/committees, laboratory directors, and PIs should clearly discourage laboratory entry except for scheduled educational activities conducted by an authorized host. Non-laboratory research settings, such as animal facilities, farms, and field research sites, may follow different guidelines; please contact the host department to find out about specific requirements or restrictions. The following apply to all research areas:

- An age-appropriate ratio of responsible adults to minors must be maintained at all times.
- Visitors must be trained how to respond in an emergency (e.g., how to evacuate in the event of a fire in the building).
- Minors and accompanying adults must be provided with and wear appropriate personal protective equipment (PPE) before being allowed into the research area.
- Minor visitors may not participate in any laboratory activities.
- All hazardous materials must be properly stored and or contained during the visit.

3. **Minors participating in research**

Minors between the ages of 14 and 17 who are not matriculated UW-Madison students may only participate in research activities that are part of university-sanctioned educational programs or that have been approved in writing in advance by the Department Chair, Institute Director, or equivalent authority. Minors who are enrolled as students at UW-Madison may volunteer or work in research settings, but there are restrictions on the materials and activities that are allowed. Please note that this guidance is not intended to cover minors that are the *subjects* of research studies; oversight for research with human subjects is provided by the Human Research Protection Program: [https://research.wisc.edu/compliance-policy/human-research-protection-program/](https://research.wisc.edu/compliance-policy/human-research-protection-program/).

A risk assessment that takes into account all biological, chemical, radiological, mechanical, and electrical materials and equipment used in the research environment should be performed before and during activities involving minors. This is to ensure that the appropriate engineering and administrative controls and PPE are in place to prevent injury or exposure. To set up a consultation please call Environment, Health and Safety at 608-265-5000.

Some materials and activities are restricted or prohibited for minors:

3a. **All research settings**
- Minors are not allowed to perform tasks that require respiratory protection.
• Minors are not allowed to perform tasks that involve power-driven equipment such as wood-working machinery, metal-forming, metal-punching, or metal-shearing machines, saws, and hoisting apparatus including an industrial truck, crane, or hoist.

3b. **Biological**

• Biological risks may include recombinant and/or infectious agents. Under Wisconsin state law, minors may not work with infectious agents (i.e., bacteria, mycoplasma, fungi, parasites, or viruses that can cause illness in humans) that are introduced for use, study, or production.

• Minors are absolutely prohibited from entering or working in the following:
  o Any laboratory or research space designated BSL3
  o Any laboratory or research space designated BSL2 with BSL3 practices
  o Any laboratory or research space where select agents are used or stored
  o Any laboratory or research space where the Institutional Biosafety Committee has restricted access.

• If participating in research using biological materials, minors must complete the online Required Biosafety Training at Learn@UW and lab-specific training prior to beginning work. If the activities involve recombinant or biohazardous materials, the minor(s) must be listed in the personnel section of a registered Biosafety Protocol. For questions or assistance with Learn@UW or Bio-ARROW, please contact the Office of Biological Safety at biosafety@fpm.wisc.edu or 608-263-2037.

3c. **Animal**

• Work with or around animals may pose additional risks, including bites, scratches, and exposure to anesthetic gases, allergens, or zoonotic agents. Information about hazards associated with specific animal species can be found at https://ehs.wisc.edu/hazards-by-species/.

• Minors are prohibited from entering or working in the following:
  o Any animal housing or procedure room designated ABSL3
  o Any animal housing or procedure room designated ABSL2 with ABSL3 practices
  o Any animal housing or procedure room where select agents are used or stored
  o Any animal housing or procedure room where an Animal Care and Use Committee has restricted access.

• If participating in research using animals, please contact the Research Animal Resources Center at help@rarc.wisc.edu or 608-262-1238 for information about animal protocol and training requirements. For other animal-related safety concerns, please contact the Animal Research Safety team in the Office of Biological Safety; their contact information for can be found at https://ehs.wisc.edu/animal-research-safety-team/.

3d. **Chemical**
• Restrictions should be placed on the use and quantities of all hazardous chemicals, including corrosives, flammable liquids, carcinogens, and toxic substances. These restrictions must be documented by the PI.
• Minors should never be allowed to handle or work in the vicinity of highly reactive and unstable materials (i.e., substances that have the potential to vigorously polymerize, decompose, condense, or become self-reactive under conditions of shock, pressure, temperature, light, or contact with another material). Examples include explosives, peroxides, water-reactive chemicals, self-reactive chemicals, and pyrophorics.
• Minors should never be allowed to work with highly toxic chemicals that fall into GHS Acute Toxicity Hazard Class 1 and 2: http://www.chemsafetypro.com/Topics/GHS/GHS_hazard_class.html
• Minors should never be allowed to handle or work with International Agency for Research on Cancer (IARC) Group 1 or 2A carcinogens: http://monographs.iarc.fr/ENG/Classification/
• If participating in research in a setting where chemicals are used, minors must complete the Hazard Communication Online Training at Learn@UW and lab-specific training prior to beginning work. For questions or assistance with chemical training or use, please contact the Office of Chemical Safety at chemsafety@fpm.wisc.edu or 608-265-5700.

3e. Radiological
• State law restricts exposure of minors to radioactive substances and ionizing radiation in the workplace. Laboratories in which radioisotopes or sources of ionizing radiation are used should contact the Office of Radiation Safety prior to allowing minors in the lab at radiationsafety@wisc.edu.

4. Helpful contact information

Environment, Health and Safety
608-265-5000 (general)

Office of Biological Safety
biosafety@fpm.wisc.edu
608-263-2037

Animal Research Safety
https://ehs.wisc.edu/animal-research-safety-team/

Office of Chemical Safety
chemsafety@fpm.wisc.edu
608-265-5700.
5. Related policies and regulations

- UW-Madison Children in the Workplace policy: https://kb.wisc.edu/ohr/policies/page.php?id=66887
- Wisconsin Child Labor Law s. 35.93, Wis. Stats., DWD 270.12 “Hazardous occupations prohibited to all minors”: https://docs.legis.wisconsin.gov/code/admin_code/dwd/270_279/270/12
- Wisconsin Employees’ Right to Know Law s. 101.58 to 101.599, Wis. Stats.: https://docs.legis.wisconsin.gov/statutes/statutes/101/i/58

Office of Radiation Safety
radiationsafety@wisc.edu

Office of Risk Management
riskmgmt@bussvc.wisc.edu
608-262-9082

Environmental and Occupational Health/Occupational Medicine
EOH@uhs.wisc.edu
608-265-5610

Research Animal Resources Center
help@rarc.wisc.edu
608-262-1238