



Policy on Minors (not Acting as Students/Employees) in Research Laboratories, Clinics, and Animal Facilities

A. OBJECTIVE

This Policy aims to help ensure the safety and security of minors by designating when they will be allowed to perform research in University laboratories, greenhouses, clinic areas, or animal facilities when not acting in a capacity as a University student or employee. This policy address the specific hazards that may be encountered in research environments. The overarching [University of Georgia Policy for Programs and Activities Serving Minors](#) addresses general considerations when minors are involved in University programs.

B. SCOPE

This Policy applies to specific activities by minors only when they are not acting in a capacity as a University student or employee and is an extension of the overarching [University of Georgia Policy for Programs and Activities Serving Minors](#). Hence, this Policy provides guidance and requirements in addition to the [University of Georgia Policy for Programs and Activities Serving Minors](#). All minors must fully comply with this Policy when it applies, and all University employees are responsible for ensuring compliance with this Policy when they are conducting research with minors. The overarching policy requires specific training for all University employees who are working with minors in any capacity.

For minors acting as a University student or employee, the overarching [University of Georgia Policy for Programs and Activities Serving Minors](#) and pertinent University student and employment policies apply. (For example, a 17-year-old University student working on a research project that involves interviewing minors who are not UGA students must comply with the overarching Policy, as does any other UGA student or employee).

The Office of Research Integrity and Safety is the Policy owner with oversight provided by the Research Safety Committee. The Office of Research Safety operationalizes the Policy.

C. DEFINITIONS

1. “Minor” means any unemancipated person who has not attained the age of 18 years.
2. “Research spaces” means all University laboratories, greenhouse, clinic area, and animal facilities.

- a. "Laboratory" means a defined research space where hazardous chemicals, biological agents, equipment, or human-origin biological samples may be present. The Office of Research Safety and Environmental Safety Division inspects these spaces.
- b. "Greenhouse" means a defined research space intended to grow plants where hazardous chemicals, biological agents, or equipment may be present. The Office of Research Safety and Environmental Safety Division inspects the spaces.
- c. "Clinic area" means a defined space devoted to the diagnosis, treatment, and care of human patients on an in-patient, outpatient, or day-care basis.
- d. "Animal facility" means a defined space under the control of University Research Animal Resources where research animals are maintained. The Institutional Animal Care and Use Committee inspects these spaces.

D. POLICY

The following requirements apply to all minors when not acting as a University student or employee.

1. When this Policy applies, minors are prohibited from operating University farm machinery or state vehicles and working without direct supervision in machine shops. Machine shops are spaces where machining tools and cutting tools are used to make parts out of metal, glass, or wood.
2. When this Policy applies, minors are prohibited from accessing to conduct research and from utilizing any equipment in the following University spaces:
 - i. Any laboratory or facility designated as BSL-2+ or higher for recombinant or infectious organisms;
 - ii. Any laboratory or facility where select agents, or explosives are used or stored; and
 - iii. Any University Research Animal Resources housing or procedure area/lab/facility (note that this does not apply to individual Principal Investigator animal research laboratories).
3. When this Policy applies, minors are prohibited from making any use of:
 - i. Radioactive materials or radiation (X-rays) that may result in the exposure of minors to more than 10 percent of the annual dose limits specified for adult workers;
 - ii. Particularly Hazardous Substances as defined by OSHA Laboratory Standard ([29 CFR § 1910.1450](#)); and
 - iii. Pyrophoric substances.
4. When this Policy applies, minors are allowed to participate in human subjects research as subjects or as researchers in compliance with the Human Research Protection Program policy, the Minors in Human Subjects Research policy, and the overarching [University of Georgia Policy for Programs and Activities Serving Minors](#).

5. When this Policy applies, minors are allowed to participate in University programs or science fairs and access and utilize research spaces when specifically invited to do so by the University as part of the program or science fair. In these cases, minors must be made aware of and required to comply with all unit security and access policies and all safety and other directives of the program or science fair and its staff.
6. When this Policy applies, minors are allowed to access research spaces to conduct research, including utilizing any equipment in those spaces, **only** if the following requirements are met in full:
 - i. A University employee desiring to request that a minor be allowed access to specific research spaces under this Policy must initiate the process by filling out this [Minor's Research Access Form](#). Among other things, this Minor's Research Access Form requires:
 - Contact information for the Principal Investigator(PI)/sponsor, the minor, the minor's parent/guardian, the dean or department head, and the person who will oversee the minor in the space;
 - A clear description of the project in which the minor will participate, the specific spaces to which the minor will have access, the activities the minor will conduct in the space, and any hazards the minor may be exposed to, and lab-specific safety training.
 - ii. The PI, the minor, and the minor's parent/legal guardian must sign the Minor's Research Access Form. The Minor's Access Form includes the following elements for signature:
 - Assurance by the PI they will adhere to the Minors Policies, will provide appropriate PPE and supervision, and the laboratory is in compliance with UGA safety programs.
 - Assurance by the minor that they have read and understand the Policy and the lab-specific Chemical Safety Plan provided by the PI.
 - Assurance by the Parent /guardian indicating that they have read the information provided in the Minor's Access Form, understand the risks, and consent to the minor's access to University laboratories/facilities as identified; and
 - Release, waiver, and covenant not to sue for signature by the parent/guardian
 - Photo and media release for signature by the parent/guardian
 - iii. Copies of the completed form are provided to the parent/guardian, maintained in the laboratory or facility by the minor's supervisor, and sent to the Office of Research Safety and, if applicable, the office of the sponsoring program (such as Young Dawgs).
 - iv. Once the Minor's Access Form is fully executed, before the minor may access the requested laboratories/facilities, the minor must:
 - Complete any hazard-specific safety training, and completion must be documented by the person supervising the minor in the space.

- Obtain any required occupational health and safety services from the minor’s primary care physician. It is reasonable to assume that if occupational health services are required for employees in the space, they will be required for the minor participant.
7. While making permitted use of the space, the minor must be provided and wear personal protective equipment specific to the hazard, along with instructions for proper use and disposal.
 8. **The minor must be supervised at all times while in the facility and never left alone. The intensity of the supervision is expected to increase with increased risk.**
 9. Hours of work comply with [Federal Regulation 29 CFR 570.35](#).
 10. The laboratory/facility must maintain full compliance with all applicable University of Georgia safety programs and regulations.

END OF POLICY