Minors in Research Laboratories Policy

Laboratories may contain biological, chemical, and/or radiological hazards, as well as mechanical, electrical, and thermal hazards from laboratory equipment. Laboratory animals may pose additional risks, including bites, scratches, and exposure to allergens or zoonotic agents. These hazards pose risks not only to those performing laboratory work, but also to those who are present within the laboratory while work is ongoing.

1. Requirements for minors to enter research laboratories
   Minors are not allowed in high risk areas. Access to research areas may be prohibited due to reasons of safety, security, or regulatory compliance. Minors must be directly supervised at all times by the principle investigator (PI) or a trained staff member designated by the PI. Minors are not allowed to be alone in a research laboratory, and are not permitted to have their own building or room access.

2. Minors visiting laboratories
   Children under the age of 10 are prohibited from entering laboratories. 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, once program registration requirements have been met. The following apply to all research areas:
   - A minimum age-appropriate ratio of laboratory staff to minor visitors must be maintained at all times:
     - Age 10-13 1:8
     - Age 14-17 1:12
     Trained laboratory staff may contribute to adult:student ratios, but non-laboratory staff (e.g., parents, teachers, chaperones) do not count towards laboratory staff:minor visitor ratios.
   - 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 research activities.
   - All hazardous materials must be properly stored or contained during the visit.

3. Minors participating in laboratory research
   Children under the age of 14 are prohibited from participating in research activities in UW-Madison laboratories. Minors between the ages of 14 and 17 who are not matriculated UW-Madison students may only participate in research activities for which program registration requirements have been met. Minors who are enrolled as students at UW-Madison that volunteer or work in UW-Madison laboratories do not fall under these program registration requirements, but there are still restrictions on the materials and activities that are allowed. Please note that this policy does not cover minors that are the subjects of Institutional Review Board-approved research studies.
A risk assessment that takes into account all biological, chemical, radiological, mechanical, and electrical materials and equipment used in the research environment must be performed before and during activities involving minors. Based on the risk assessment, appropriate engineering and administrative controls and PPE must be in place to prevent injury or exposure. The Environment, Health and Safety (EH&S) Department will provide consultations upon request. Some materials and activities are restricted or prohibited for minors:

3a. **All laboratories**
- 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**
- 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 prohibited from entering or working in the following:
  - Any laboratory or research space designated BSL3
  - Any laboratory or research space designated BSL2 with BSL3 practices, BSL2-enhanced, or BSL2+
  - Any laboratory or research space where select agents are used or stored
  - 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. Questions regarding biological materials should be directed to the Office of Biological Safety, EH&S.

3c. **Animal**
- Minors are prohibited from entering or working in the following:
  - Any animal housing or procedure room designated ABSL3
  - Any animal housing or procedure room designated ABSL2 with ABSL3 practices, ABSL2-enhanced, or ABSL2+
  - Any animal housing or procedure room where select agents are used or stored
  - Any animal housing or procedure room where an Animal Care and Use Committee has restricted access
- Minors are prohibited from working with non-human primate species that are hosts for herpesvirus B (e.g., macaques), or blood, body fluids, or tissues from these species.
• Questions about animal protocol and training requirements should be directed to the Research Animal Resources Center. Animal-related safety concerns should be directed to the Animal Research Safety team in the Office of Biological Safety, EH&S.

3d. **Chemical**

• The PI must place restrictions on the use and quantities of all hazardous chemicals to be used by the minor, including corrosives, flammable liquids, carcinogens, and toxic substances. These restrictions must be documented by the PI.

• Minors are prohibited from handling or working 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 are prohibited from working with:
  o Highly toxic chemicals that fall into GHS Acute Toxicity Hazard Class 1 and 2: [http://www.chemsafetypro.com/Topics/GHS/GHS_hazard_class.html](http://www.chemsafetypro.com/Topics/GHS/GHS_hazard_class.html)
  o International Agency for Research on Cancer (IARC) Group 1 or 2A carcinogens: [http://monographs.iarc.fr/ENG/Classification/](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. Questions regarding chemical use or hazards should be directed to the Office of Chemical Safety, EH&S.

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, EH&S prior to allowing minors in the lab.

4. **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/

Research Animal Resources Center
help@rarc.wisc.edu
608-262-1238
5. Related policies and regulations

- UW-Madison Children in the Workplace policy:
- UW-Madison Minor Protection and Adult Leadership (“Two Deep”) policy:
- 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](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](https://docs.legis.wisconsin.gov/statutes/statutes/101/I/58)