**Policy Statement**

Harvard is committed to fostering a safe environment for minors and preventing minors’ exposure to hazardous materials, laboratory pathogens, injurious incidents, and other inherent dangers that may be present in University laboratories. This policy establishes University-wide requirements regarding the presence of minors in University laboratories. All laboratories are also expected to comply with Harvard’s [Policy for the Safety and Protection of Minors](#).

**Definitions**

For the purposes of this policy, a **Minor** is a person under 18 years of age. This policy does not apply to minors who are enrolled at Harvard as students in a degree-granting program.

A **Laboratory** is a research or clinical setting where scientific research or instruction is conducted. This includes research and teaching laboratories and their associated support and core facilities where hazardous chemicals, radiation, or biological materials are handled or stored as well as machine shops, electrical rooms, field sites, museum collections, conservation laboratories or any other research or clinical environments with unusual hazards. For purposes of this policy, a laboratory does not include dry or computational laboratories, or any other laboratories where no hazardous chemicals, radiation, or biological materials are handled or stored.

**Applicability**

This policy applies to minors who are visitors, volunteers, employees, interns, individuals participating in “shadowing” or other outreach programs, and contractors. Other entities/individuals covered by this policy include:

- All Schools, departments and other units of the University
- All members of the University community:
  - Faculty, including senior, junior and visiting faculty
  - Other salaried and non-salaried academic appointees, including post-doctoral fellows, research fellows, and teaching assistants.
  - Staff, including salaried exempt workers and hourly non-exempt workers
  - Students
  - Volunteers
- Non-Harvard organizations that operate programs for minors in Harvard facilities, covered by virtue of their facilities use agreements with the University
- Contractors, including independent contractors, external consultants, workers hired through an outside employment agency, and workers employed on campus through service vendors.
Minors Under 13: Minors under the age of 13 may not be present in a laboratory, unless they are touring or visiting a laboratory pursuant to the requirements below.

Touring/Visiting a Lab: Minors may enter a Harvard laboratory as part of a PI-authorized and supervised tour/visit. The PI or primary supervisor of the laboratory will be responsible for proper supervision and for providing any appropriate personal protective equipment for visitors. Laboratory tours may only be conducted at times when all hazardous materials are properly stored and are not being used for experiments. Minors participating in tours or visits must be supervised at all times while on the premises, and may not participate in any laboratory activities.

Harvard Academic Programs: Minors age 14-17 are allowed in a laboratory setting when they are participating in a Harvard academic program, provided that:
- They are at all times under the direct supervision of a qualified adult designated for this responsibility
- They have received general lab safety training from EH&S and been trained in the specific hazards to which they may be exposed in the laboratory.
- They agree to strictly adhere to the laboratory-specific requirements concerning Personal Protective Equipment (“PPE”)
- They have written consent from their parent or guardian.

Working and Interning in a Lab: Minors age 16-17 are permitted to work in Harvard laboratories as employees or interns (note that unpaid interns must meet the test for intern/trainee status under the Fair Labor Standards Act; see guidance on the OGC website), provided that:
- They are at all times under the direct supervision of a qualified adult designated for this responsibility
- They have received general lab safety training from EH&S and been trained in the specific hazards to which they may be exposed in the laboratory.
- They agree to strictly adhere to the laboratory-specific requirements concerning Personal Protective Equipment (“PPE”)
- They have written consent from their parent or guardian.

Supervision Required: Minors may not, under any circumstances, be alone in a University laboratory, even if they are only conducting computational work. The PI or primary supervisor and/or the alternate must closely supervise the minor, i.e., work with or near him/her in the laboratory.

Ionizing and Non-ionizing Radiation: Minors may not work with, or be permitted in, a University laboratory that contains radioactive materials, except if the minor is a Harvard student and has prior approval from the University’s Radiation Protection Office.

Biological Hazards: Minors may not work with, or in the immediate vicinity of infectious agents. In particular, minors must be isolated from the following biological hazards:

- Biosafety Level (BL2) or Biosafety Level (BL3) pathogens
- Primary human and non-human primate materials
- Biological Select Agents or Toxins
- Risk Group 2 recombinant materials and viral vectors
**Chemicals:** Minors may not access, handle or work with restricted chemicals, pyrophorics, controlled substances, select carcinogens, reproductive toxins, highly reactive, highly flammable, or highly toxic chemicals. This includes packaging or shipping such materials or cleaning up spills of such materials. The University’s EH&S Department has compiled a list of common carcinogens, reproductive toxins, biotoxins, and acutely toxic substances at: [http://www.ehs.harvard.edu/node/7532](http://www.ehs.harvard.edu/node/7532)

**Lasers:** Minors may not work with Class 3b or 4 lasers that require registration with the Radiation Safety Officer.

**Animals:** Minors may not access, handle or work with or in close proximity to vertebrate research animals.

**Major Physical Hazards:** Under Massachusetts law, minors may not engage in work involving major physical hazards. Examples of equipment presenting major physical hazards include: lathes, electric saws, high powered tools, etc.; areas with potentially hazardous noise (e.g. where one has to shout to be heard); electrical hazards such as electrophoresis equipment, high voltage equipment, etc.

**Respirators:** Minors may not work in an area requiring the use of respirators.

**Exceptions:** In considering whether an exception to this policy is warranted, local departments should consult with Harvard’s Youth Protection Office and the Office of the Vice Provost for Research. These offices will consult with Harvard’s Environmental Health and Safety Office and the Office of General Counsel as necessary. Relevant information to consider includes: the specific laboratory environment; the minor’s previous lab course work and/or related experience; the safety training the minor will receive; the ability of the lab to provide close supervision; and the purpose of the proposed lab experience.

**CONTACTS / REFERENCES**

Environmental Health & Safety [http://ehs.harvard.edu/contact]

Youth Protection Office [http://youthprotection.harvard.edu]

Policy for the Safety and Protection of Minors

Office of the General Counsel: [http://ogc.harvard.edu]

Summary of Massachusetts Laws Regarding Minors’ Work Hours