

# Advisory 21.0: Minors in Laboratories

Requirements for minors entering laboratories and other potentially hazardous locations

Advisory No.	Applies To	Owner	Revision
21.0	UC laboratories, shops, maker spaces and other potentially hazardous locations	Environmental Health & Safety	May 2026 Draft

## 1. Purpose

This advisory establishes requirements for minors entering laboratories and other potentially hazardous locations. It supplements [UC Policy 16.19, Protection of Minors on Campus](#), by addressing laboratory-specific and work-area-specific risks, hazard assessment, training, supervision, documentation and access controls.

## 2. Scope

This advisory applies to all University laboratories, teaching laboratories, research spaces, clinical/research support areas, shops, maker spaces, animal areas, radiation-use areas, laser areas, hazardous material storage or waste accumulation areas, and other University-controlled locations where hazardous substances or physical hazards may be present.

This advisory does not replace requirements established by Human Resources, the Office of General Counsel, the Office of Research, Institutional Review Board (IRB), Institutional Biosafety Committee (IBC), Institutional Animal Care and Use Committee (IACUC), Radiation Safety Office (RSO), program sponsors, or applicable federal and state minor labor laws.

## 3. Definitions

Term	Definition
Minor	For the purposes of this policy, any person less than the age 18, or any person under the age of 21 who is incapable of self-care due to a mental or physical disability; and who is not matriculated or enrolled in a degree seeking program or the equivalent.
Laboratory	A UC space used for teaching, research, testing, analysis, demonstration or preparation where hazardous chemicals, biological agents, radioactive materials, lasers, animals, equipment or other hazards may be present.
Other potentially hazardous location	A non-laboratory UC location with physical, chemical, biological, radiological, mechanical, electrical, thermal, noise, pressure, equipment or material-handling hazards, including shops and maker spaces.
Authorized Adult Supervisor	Any adult, age 18 and older, who supervises, or is otherwise responsible for the direct on-site care, physical custody or control of minors in a Covered Program.
High-hazard activity	An activity or location involving elevated risk such as radiation, Class 3B or Class 4 lasers, BSL-2 enhanced or higher biological hazards, animal work, cryogenics, high voltage, highly hazardous chemicals, compressed gases, pressure systems, machine tools, shop equipment or other hazards identified by EH&S or the responsible unit.

## 4. General Prohibitions

Individuals under 18 years of age are prohibited from entering laboratories or other potentially hazardous locations unless the conditions stipulated in this advisory are satisfied and the entry is specifically authorized by the responsible department, program sponsor or laboratory supervisor.

A minor may only enter a covered space when there is a valid University purpose, the hazards are understood and controlled, the minor can understand safety instructions, required UC Policy 16.19 and program documentation is complete, and direct active supervision is provided for the entire period of access.

## 5. Permitted Access Conditions

### 5.1 Employment or University Volunteer Activities

- The minor must be formally employed by the University or accepted through an approved volunteer process before participating in the activity.
- The responsible unit must comply with applicable Human Resources requirements, UC Policy 16.19, Ohio minor labor requirements, and federal child labor restrictions before assigning work.
- The assignment must be limited to activities that are lawful for the minor to perform and must not include prohibited hazardous occupations or uncontrolled exposures.
- Training, hazard assessment, PPE, documented authorization and direct active supervision must be completed before the minor enters the covered space.

### 5.2 Enrollment in Academic Courses

- Minors enrolled in University courses that include laboratory or field components may participate when the course includes documented safety instruction appropriate to the hazards.
- Instruction and supervision must be provided by University faculty, staff, teaching assistants or other approved personnel familiar with the hazards and controls.
- Course activities must remain within the scope of the approved curriculum and must follow all laboratory-specific safety requirements.

### 5.3 University-Sponsored Programs, Tours or Observational Activities

- The activity must be sponsored or approved by an appropriate University department, program or unit.
- Required UC Policy 16.19 documentation, program registration, approved adult supervision, background checks, training, parental/guardian consent and waivers must be completed as applicable before the minor participates.
- Tours and observational activities must be structured to avoid active hazardous operations, uncontrolled exposures and unsupervised access.
- Site-specific safety orientation and required PPE must be provided before entry.

## 6. Required Review Before Minor Access

Before a minor enters a covered space, the responsible laboratory supervisor, principal investigator, shop manager, program sponsor or department must complete and retain the Appendix B acknowledgement and confirm the following:

- The minor has a valid purpose for entering the space.
- The minor can understand and follow safety instructions.
- The hazards and permitted activities have been reviewed and documented.
- Required training, PPE, emergency procedures and incident reporting procedures have been provided.
- Direct active supervision has been assigned and will be maintained at all times.

- Required approvals have been obtained for high-hazard activities or restricted spaces.
- Any required UC Policy 16.19, HR, program, IRB, IBC, IACUC, RSO or EH&S documentation is complete before access.
- Parental or Guardian Consent is Verified.

## 7. Training Requirements

Training must be appropriate to the activity, age, experience and hazards. Training must be documented and completed before the minor enters the covered space. At minimum, training or orientation must include:

- General laboratory or work-area safety rules.
- Hazard Communication, Chemical Hygiene Plan and laboratory SOP information, when chemicals are present or used.
- Biological safety and Bloodborne Pathogens training when biological materials, human blood, human tissue, human cell lines or other potentially infectious materials may be encountered.
- Radiation safety, laser safety, animal safety, cryogen safety, shop safety, machine safety or other hazard-specific training when applicable.
- Required PPE, hygiene practices, waste handling restrictions, prohibited activities and emergency procedures.
- Incident, injury, near-miss and unsafe condition reporting requirements.

## 8. Supervision Requirements

- Minors must always remain under direct active supervision by the approved adult supervisor while in a covered space.
- The supervisor must be familiar with the space, the activity, the hazards, required PPE, emergency procedures and restrictions that apply to the minor.
- Minors must not work alone, perform after-hours work, enter restricted areas without the supervisor, or be left unattended in a laboratory, shop or other potentially hazardous location.
- A single adult supervisor may not supervise more minors or activities than can be safely controlled.

## 9. High-Hazard and Restricted Activities

The following conditions require written hazard review and approval before minor access. The review must identify whether access is prohibited, limited to observation, or permitted only under specific controls.

- Radiation-producing equipment or radioactive materials: Radiation Safety Office approval is required before access. Minors may not be assigned work that would result in prohibited exposure to radioactive substances or ionizing radiation.
- Class 3B or Class 4 lasers, high voltage equipment, cryogenic systems, pressure systems, highly hazardous chemicals, toxic gases, pyrophorics, explosives or energetic materials: EH&S and the responsible safety program must review and approve the activity before access.
- Biological materials, recombinant or synthetic nucleic acid molecules, human materials, animals or other regulated research materials: IBC, IACUC, IRB, occupational health, biosafety and program approvals must be obtained as applicable before access.
- Shops, maker spaces and equipment areas: minors may not operate or assist with equipment prohibited by federal or state minor labor restrictions. Observation is only permitted when hazards are controlled and direct supervision is maintained.

- Hazardous waste accumulation, remediation, spill response, emergency response, confined spaces, roofs, demolition, excavation, elevated work, forklift/hoist operation, powered industrial equipment and similar high-risk work are not appropriate for minors.

## 10. Strict Prohibitions

- Infants, toddlers, and children who are unable to understand and follow safety training are not permitted in laboratories or other potentially hazardous locations, except as approved patients or authorized research participants with documented consent.
- Minors must not be left unattended or permitted to work alone.
- Minors must not enter spaces with uncontrolled hazards, active emergency conditions, active spills, decontamination activities or hazards that cannot be reduced to an acceptable level through engineering controls, administrative controls, PPE and direct supervision.
- Minors must not perform activities prohibited by applicable federal or state minor labor laws or by UC policy, program-specific requirements, EH&S, RSO, IBC, IACUC, IRB or the responsible department.
- Minors must not use hazardous equipment, hazardous materials or regulated materials outside the scope of the documented hazard assessment, training and approval.

## 11. Documentation and Records

- [Appendix B](#) must be completed before minor access to a covered space and retained by the responsible department or program.
- Documentation must include the minor’s name, dates of participation, location, activity, assigned supervisor, hazards, training, PPE, required approvals and any restrictions. (See Appendix B)
- Program forms required by UC Policy 16.19, parental/guardian consent, waivers, HR records, training records and approval records must be retained according to applicable University record-retention requirements.
- Departments must provide copies of completed records to EH&S, Human Resources, the Office of General Counsel or other University offices upon request.

## 12. Reporting and Emergency Response

- Call 911 for emergencies requiring immediate medical, fire, police or hazardous materials response.
- Report injuries, exposures, incidents, near misses and unsafe conditions through the appropriate University reporting process and notify the responsible supervisor/program sponsor.
- Report suspected abuse, neglect, misconduct or policy violations involving minors according to UC Policy 16.19 and applicable mandatory reporting requirements.
- Suspend the minor’s access until any incident, exposure, uncontrolled hazard or documentation deficiency has been reviewed and corrected.

## 13. Responsibilities

Role	Responsibilities
Laboratory Supervisor / Principal Investigator / Shop Manager	Determine whether minor access is appropriate; complete hazard assessment; verify training, PPE, controls and supervision; complete Appendix B; maintain records; stop access if conditions are unsafe.
Department / Program Sponsor	Ensure UC Policy 16.19 and program requirements are complete; verify approved adult supervisors; maintain consent, training and approval records; coordinate with EH&S and other University offices as needed.

Approved Adult Supervisor	Provide direct active supervision; enforce restrictions, PPE and safe work practices; monitor the minor's activities; initiate emergency and incident reporting if needed.
Minor Participant	Follow all instructions, use required PPE, stay with the assigned supervisor, report concerns immediately and perform only approved activities.
EH&S / RSO / Safety Committees	Provide guidance; review high-hazard or restricted activities; determine additional controls, training or approvals; restrict access when hazards are not adequately controlled.

## 14. Universal Requirement

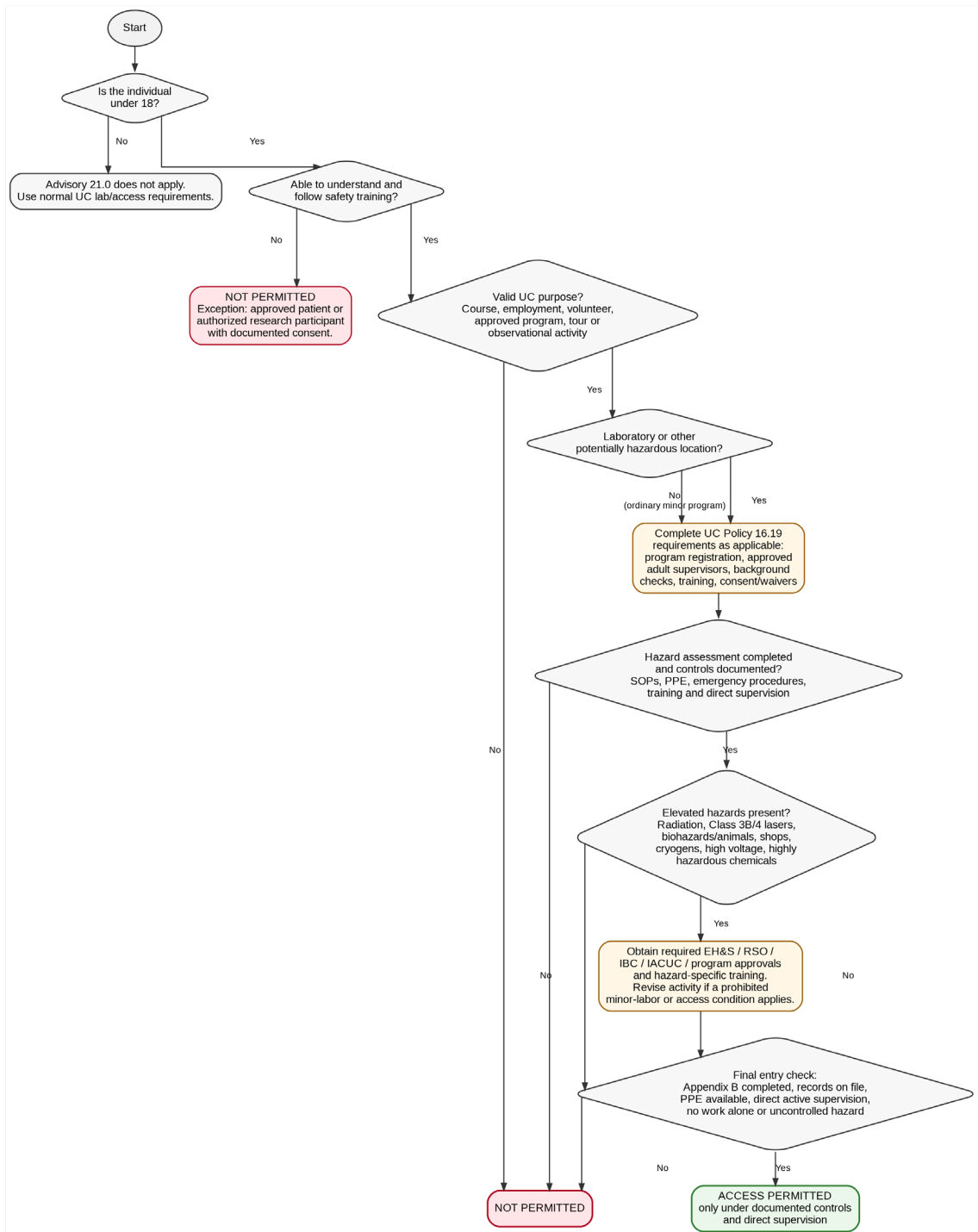
All individuals, regardless of age, must satisfy laboratory-specific and location-specific safety, training, hazard-control and PPE requirements before entering or working in a UC laboratory or other potentially hazardous location.

## 15. References

- University of Cincinnati Policy 16.19, Protection of Minors on Campus.
- 29 CFR 1910.1450, Occupational Exposure to Hazardous Chemicals in Laboratories.
- 29 CFR 1910.1200, Hazard Communication.
- 29 CFR 1910.1030, Bloodborne Pathogens.
- Applicable UC policies, research compliance requirements, IRB, IBC, IACUC, Radiation Safety Office, Laser Safety and EH&S program requirements.

## Appendix A - Minor Access Decision Flowchart

Use this flowchart as a screening aid before allowing a minor to enter a laboratory or other potentially hazardous location. The flowchart does not replace required program review, approvals or written hazard assessment.



## Appendix B - Minors in Laboratories Acknowledgement of Responsibilities

Complete this form before a minor enters a UC laboratory or other potentially hazardous location.

### Minor and Activity Information

Minor's Name	
Date(s) of Participation	
Host Department/Unit	
Program, Class or Activity	
Location Details (Building, Room, Lab Name)	
Basis for Access (course, employment, volunteer, program, tour, observation)	
Brief Description of Approved Activities	
Hazards Present / Applicable Controls	
Required PPE	
Required Approvals Obtained (EH&S, RSO, IBC, IACUC, IRB, HR, Program)	

### Supervisor Certification

I certify that the minor listed above will be informed of the hazards associated with the approved activity, will receive activity-specific safety instruction, and will be directly supervised by an approved adult familiar with the equipment, materials, procedures and hazards in this space. I further certify that the minor will only perform the activities described above; will not be left unattended; and will follow applicable UC Policy 16.19, EH&S, department, program and laboratory-specific requirements.

Adult Supervisor Name	
Title/Role	
Department	
Phone/Email	
Signature	
Date	

### Parent/Guardian Approval

As the legal parent or guardian, I provide my consent for my child to participate in the University of Cincinnati program, class, or activity described above and understand the University has taken action to reduce or eliminate any hazards that may be present in the area.

Parent or Guardian Name	
Parent or Guardian Signature	
Date	

### Required Confirmation Checklist

- UC Policy 16.19 requirements have been reviewed and completed as applicable.
- Parent/guardian consent, program registration, waivers and HR/volunteer documentation are complete as applicable.
- Hazard assessment and activity-specific SOPs/controls have been reviewed.
- Training, PPE, emergency procedures and incident reporting instructions have been provided.
- High-hazard or restricted activity approvals have been obtained or the activity has been revised to eliminate prohibited access.
- The minor will remain under direct active supervision at all times and will not work alone.

Record Retention: Maintain the completed form and supporting documentation with the responsible department or program. Provide copies to EH&S or other University offices upon request.