

CALIFORNIA INSTITUTE OF TECHNOLOGY

STAFF PERSONNEL MEMORANDA

Subject: Minors	Memo No. 9-1 Pages: 3 Date: March 6, 2017
Approved by: Julia McCallin, Associate Vice President for Human Resources	

(This supersedes Memo No. 9-1, dated June 1, 2016)

1.0 Policy

The California Institute of Technology (Caltech or Institute) is committed to promoting the safety and well-being of minors who are on campus and at JPL, and who are involved in Institute programs and activities. The Institute complies with all applicable federal, state, and local laws and regulations regarding minors, including reporting of child abuse and neglect, and expects all members of the Caltech community to behave appropriately and to follow all applicable laws, regulations and requirements when interacting with minors.

2.0 Definitions

- 2.1 A minor or child is anyone under the age of 18.
- 2.2 A volunteer is an uncompensated individual who performs services directly related to the business of the Institute in order to support the Institute's activities or gain experience in a specific endeavor.
- 2.3 An intern is an individual who is at campus or JPL for educational purposes. An intern may or may not be paid by campus, JPL, or a third party.
- 2.4 A Mandated Reporter is an Institute employee whose duties bring them into contact with minors on a regular basis or who supervises employees whose duties bring them into contact with minors on a regular basis, as to child abuse or neglect occurring on Institute premises (including campus, JPL, or other locations where the Institute does business) or at an official activity of, or program conducted by, the Institute.
- 2.5 Child abuse includes serious endangerment of a child's physical or mental health due to injury by act or omission (neglect), including acts of sexual abuse.

- 2.6 Programs for Minors are any activities at the Institute or sponsored by the Institute which are aimed at minors who are not matriculated Caltech students.

3.0 Requirements Applicable to All Minors

3.1 At JPL, all minors must be approved by the Directorate Business Manager. JPL only allows minors under age 16 to work or intern (minors are not part of the volunteer program at JPL) in exceptional circumstances, as approved by the Directorate Business Manager.

3.2 Under the provisions of State and Federal laws and regulations, as well as Caltech policy, minors may not be employed, intern or volunteer in any hazardous occupations. Because the restrictions can be complex and also vary according to the age of the minor, supervisors must consult with Human Resources regarding each specific minor before the minor may work, volunteer or intern at the Institute.

3.3 Examples of hazardous occupations include positions involving:

1. working in or about an area with explosives;
2. driving motor vehicles;
3. transportation of hazardous materials;
4. operation of power driven wood working machines, circular saws, band saws, guillotine shears, chain saws, reciprocating saws, wood chippers, and abrasive cutting discs;
5. operation of power driven hoisting apparatuses, including for example, operating or assisting to operate certain elevators, cranes, derricks, hoist, riggers, forklifts, or high-lift trucks;
6. operation of power-driven metal forming, punching, and shearing machines;
7. work performed in or about boiler or engine rooms;
8. roofing operations and working on or about a roof;
9. excavation operations;
10. work in connection with maintenance or repair of Institute machines or equipment; and
11. exposure to radioactive substances and to ionizing radiation.

3.4 At campus, minors working, interning or volunteering in laboratories must be approved by the Division Chair or designee in consultation with the supervising Principal Investigator. Minors working in areas with restricted access also must be approved by the supervising Director. Consideration for approval should be on a case-by-case basis taking into account potential hazards associated with the specific research, the types of equipment to be used, and any potential chemical and/or biological exposures.

3.5 At JPL, minors working or interning in laboratories must, as set forth above, be approved by the Directorate Business Manager, in consultation with the Section Manager or Group Supervisor. Consideration for approval should be on a case-by-case basis taking into account potential hazards associated with the specific research, the types of equipment to be used, and any potential chemical and/or biological exposures.

4.0 Employment of Minors and Recordkeeping

4.1. Before an offer of employment is made, the Institute must obtain a work permit from applicants under the age of 18 years who are required to attend high school.

- 4.2 Work permits are retained by Human Resources at campus and by Human Resources or the Education Office at JPL.
- 4.3 There are limitations on the hours and days that minors may work. For example, Minors age 16 and 17 who have completed 7th grade are permitted to work:
- a. no more than four hours per day on any school day;
 - b. no more than eight hours on any non-school day or any day that precedes a non-school day;
 - c. no more than 48 hours in a week whether school is in session or not;
 - d. no more than eight hours per day for days and weeks in which school is not in session;
 - e. They may not work before 5 a.m. on a non-school day, or after 10 p.m. on any day preceding a school or non-school day.

More restrictive limitations are placed on the hours and day that minors who are age 14 and 15 may work. Contact Human Resources at campus or JPL, as applicable.

- 4.3 The supervising organization will be responsible for notifying the supervisor or mentor of any work hour restrictions and any other limitations.
- 4.4 The Institute must keep on file all work permits and make them open at all times for inspection by authorized personnel and agencies for the duration of the employment. All records will be kept in Human Resources, with the exception of work permits for programs managed by the JPL Education Office.

5.0 Volunteers and Interns

- 5.1 Minors may volunteer at campus. Minors at JPL are precluded from participating in the JPL volunteer program; however, they may serve in a volunteer capacity in certain programs managed by the JPL Education Office.
- 5.2 Guidelines and procedures have been established by campus to ensure that the relationship between volunteers and campus is clearly identified and understood by everyone involved. Please see the [Volunteer Guidelines](#) for more information.

6.0 Standards for Interacting with Minors

Every member of the Institute community who interacts with minors involved in Caltech sponsored or approved programs must adhere to proper standards. Please review the [Standards for Interacting with Minors](#).

7.0 Reporting Child Abuse and Neglect & Mandated Reporters

- 7.1 **All Students, Faculty, and Staff.** Every member of the Institute community, who knows of, or reasonably suspects, child abuse or neglect has a personal responsibility to report to Caltech Security or JPL Division of Protective Services immediately.

7.2 **Mandated Reporters.** Mandated Reporters also must report child abuse or neglect immediately or as soon as practicably possible by telephone to the LA County Child Protection Hotline (800) 540-4000 [or from out of state (213) 639-4500] or Pasadena Police Department 911 (for emergencies) or (626) 744-4501 (for non-emergencies), or to another local police department. Mandated Reporters must file a written Suspected Child Abuse Report (SCAR) within 36 hours of receiving information concerning the incident. The SCAR can be completed online at <https://mandreptla.org>. Mandated Reports are required to sign an “Employee Acknowledgement of Mandated Reporter Status.” They will be provided with training on their role, including how to identify child abuse and neglect. For more information, at campus contact Employee and Organizational Development at eod@caltech.edu or at JPL contact Human Resources at (818) 354-7506.

8.0 **Background Checks**

All staff, faculty and students who are Mandated Reporters must have a criminal background check. A conviction for any crime may be considered in the decision whether to exclude an individual from supervising or interacting with minors. At campus, contact Employment and Organizational Development at eod@caltech.edu for more information or at JPL contact Human Resources at (818) 354-7506.

9.0 **Releases**

All Minor employees, interns and volunteers must have a release signed by their parent or legal guardian that includes a medical release for emergency treatment.

10.0 **Campus Programs for Minors**

All campus Programs for Minors must be registered with the Center for Teaching, Learning & Outreach and be approved by the applicable Division Administrator or Administrative Office Department Manager. Please see the [Guidelines for Programs with Minors](#) for more information.

11.0 **Exceptions**

Any exceptions to this policy require approval of the Associate Vice President for Human Resources or designee for campus, or the Director for Human Resources at JPL or designee in consultation with the responsible Directorate(s) for JPL.

Related Policies:

[Violence Prevention](#)
[Caltech Volunteer General Guidelines](#)
[Sexual Violence](#)