



# Practical guidance: Youth involvement for Habitat volunteers

# Practical guidance: Youth involvement for Habitat volunteers

The following guidance applies to all Habitat project sites, even if the work is not taking place on a traditional Habitat work site (for example, Habitat-led work at a school, church or other venue).



# 18 or older

## Legal or HFHI policy standard

No restrictions under federal labor laws. Must comply with general safety standards, Habitat policy, and insurance requirements.

## Practical implications

- Please visit the following websites for additional safety information:
  - [my.habitat.org/kc/home/construction-safety](https://my.habitat.org/kc/home/construction-safety)
  - [hfhaffiliateinsurance.com](https://hfhaffiliateinsurance.com)
  - [OSHA.gov](https://OSHA.gov)
  - [osha.gov/youngworkers/employers.html](https://osha.gov/youngworkers/employers.html)
- Affiliates should always provide proper training, personal protective equipment and supervision to staff members and volunteers.
- Affiliates are strongly discouraged from conducting any remediation work on hazardous conditions. Instead, use state-certified, qualified and insured specialty contractors for any such remediation activities. However, remediation of pollutants or hazardous conditions other than asbestos can be done by properly trained volunteers 18 and older, subject to applicable federal and state laws, including licensing and training requirements.
- No volunteer should be on a site with asbestos or where asbestos is suspected.
- Note that Habitat affiliates are likely to encounter hazardous conditions when performing repairs or rehab work on existing homes, and when doing any disaster response or recovery work. See the [Repairs AOM](#) for more information, including limitations on insurance coverage.

# 18 or older



# 16-17 years old

## 16-17 years old

### Legal or HFHI policy standard

- General safety standards, plus:
  - Cannot work from a height over 6 feet (HFHI Policy 21).
  - Cannot engage in blitz builds (HFHI Policy 21).
- “Roofing operations, on or about a roof” — defined as “all work performed upon or in close proximity to a roof, including painting ... or performed in connection with the installation of roofs or all jobs on the ground related to roofing operations such as roofing laborer, roofing helper, materials handler and tending a tar heater.”

### Cannot engage in the following activities that are found to be “particularly hazardous” (29 CFR 570.50 et seq.):

- Operating, setting up, adjusting, cleaning or repairing power-driven tools or machines — defined as “all fixed or portable machines or tools driven by power.”
- Operating circular saws, band saws, chain saws, wood chippers or cutting discs.
- Wrecking or demolition. This is defined as “all work, including cleanup and salvage work, performed at the site of the total or partial demolishing or dismantling of a building, chimney or other structure.”
- Excavation operations — excavating, working in or backfilling trenches, except working in or manually excavating or backfilling trenches that are not deeper than 4 feet.
- Driving a motor vehicle. A 17-year-old can, under limited circumstances, drive a motor vehicle when incidental and occasional (570.52), but affiliates should be aware of insurance limitations for drivers younger than 18.



## Practical implications

### May engage in these activities

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- Using nonpowered tools, such as hammers, screwdrivers, handsaws, caulk guns and staplers.
  - Using paintbrushes and paint rollers (as long as they are working below heights of 6 feet).
  - Installing insulated concrete forms, or ICFs.
  - Operating power-driven machinery such as lawn mowers, trimmers, cutters, weed eaters, edgers.
  - Being present on an active construction site, as long as they are not engaging in prohibited activities.
  - Loading and unloading materials onto or from motor vehicles or conveyors (except for power tools).
  - Removing materials (carpet, flooring, tile) so long as proper protective gear is worn.
  - All activities listed below for workers younger than 16.
- When engaging youth volunteers, the following youth-to-adult ratios are strongly recommended:
    - 10:1 (exterior).
    - 5:1 (interior).

The student learner exception allows 16- and 17-year-olds to engage in activities that are otherwise hazardous (and traditionally only allowed for those workers 18 and older) if they meet certain criteria, including enrollment in a school vocational program and a written agreement among the school, parents, and the Habitat affiliate outlining the scope of volunteer work, hours of volunteer work and how the minors' work will be supervised. Affiliates should note that this "student learner" exception applies only to 16- and 17-year-olds and only if all conditions are met. It does not apply to 14- and 15-year-olds.

### May NOT engage in these activities

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- Using power tools — defined as "any tool with a motor, as well as air-powered or pneumatic."
  - Battery-operated tools that have a motor are considered power tools.
  - Power tools include (but are not limited to) cordless drills, chain saws, circular saws, nail guns, and generally any tool that is designed to cut or create a hole in materials.
- Any remediation work on any hazardous condition (e.g., lead, asbestos, mold, etc.)
- Any blitz build events — defined as: events, outside the ordinary course of affiliate business, where multiple adjacent job sites are simultaneously active.
- Excavating, digging or otherwise working in trenches or holes that are deeper than 4 feet.
- Working on a roof or handling roofing material of any kind.
- Working above 6 feet.
- Wrecking or demolition activities.
- Driving a vehicle.

## Apprentice and student learner exception

### Exception: Apprentices and Student Learners (570.50(b) and (c))

16- and 17-year-olds can engage in activities that are otherwise hazardous if the following criteria are met:

- If the worker is an apprentice and:
  1. He or she is employed in a craft recognized as an apprenticeable trade.
  2. Hazardous activities are incidental to training.
  3. Work on the site is under the direct and close supervision of an adult.
  4. There is a written apprenticeship agreement.
- If the worker is a student learner and (more common):
  - He or she is enrolled in a vocational program at school.
  - Volunteering and engaging in the hazardous activities are incidental to the skills he or she is learning at school.
  - Work will be for short periods and under the direct and close supervision of a qualified and experienced person.
  - There is a written agreement among the school, the Habitat affiliate, a parent, and the student, outlining the scope of the volunteer work, how it will be supervised and when it will occur.

# 14-15 years old

## 14-15 years old

### Legal or HFHI policy standard

- General safety standards, plus:
  - Restrictions for 16- and 17-year-olds.
  - Cannot be on an active construction site [HFHI Policy 21].

#### Cannot engage in [29 CFR 570.33]:

- Operating, tending, setting up, adjusting, cleaning or repairing power-driven machinery, including but not limited to lawn mowers, trimmers, cutters, weed-eaters, edgers.
- Operating motor vehicles.
- Outside window washing that involves working from window sills or work that requires the use of ladders, scaffolds or their substitutes.
- Loading and unloading of goods or property onto or from motor vehicles or conveyors, except as permitted in the exception below.
- Activities during school hours.

#### But can engage in [570.34]:

- Loading and unloading personal non-power-driven hand tools (rakes, hand clippers, shovels), personal protective equipment, and personal items that the minor will use as part of his or her work at the site. Loading and unloading of trash, items for sale, cones or signage is not permitted.
- Office and clerical work, including the operation of office machines.
- Price marking and tagging by hand or machine, assembling orders, packing, and shelving.
- Cleanup work, including the use of vacuum cleaners and floor waxers and the maintenance of grounds (but not the use of power-driven mowers, cutters, trimmers or edgers prohibited above).



## Practical implications

### May engage in these activities

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**Fourteen- and 15-year-olds can engage in the following activities so long as such activities do not involve power tools (as defined above), work above 6 feet, or being on an active construction site – and there is proper supervision.**

- Using nonpowered tools, such as hammers, screwdrivers and handsaws.
- Landscaping.
- Painting (internal and external).
- Making a sign for the work site.
- Providing snacks or lunches.
- Doing small craft projects like building birdhouses, benches, flower boxes or picnic tables.
- Assembling a shed.
- Assembling planter or herb boxes.
- Decorating tool containers or boxes.
- Planting a garden for homeowners.
- Office and clerical work.

- Using vacuum cleaners and doing other cleanup work not involving power-driven machinery.
- All activities listed for those under 14.
- When engaging youth volunteers, the following youth-to-adult ratios are strongly recommended:
  - o 10:1 (exterior).
  - o 5:1 (interior).

The work-study program exception 570.36 does NOT change the types of activities 14- and 15-year-olds can do. Rather, if certain criteria are met, this exception allows 14- and 15-year-olds to engage in activities during the school day. Habitat affiliates should reference the activities above that are suitable for 14- and 15-year-olds.

### May **NOT** engage in these activities

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**In addition to all restrictions for 16- and 17-year-olds, 14- and 15-year-olds cannot:**

- Be present on an active construction site, which is defined as a site where power tools (as defined in the section for 16- and 17-year-olds) are being used and work is being done 6 feet or higher from the ground. An active construction site becomes inactive when the certified competent safety person declares it as such (including full stop of the power tools work and safe storage of the tools).

- Operate power-driven machinery such as lawn mowers, trimmers, cutters, weed eaters and edgers.
- Work from windowsills, ladders or scaffolding, whether inside or outside.
- Load or unload materials onto or from motor vehicles or conveyors, except as mentioned in the exceptions. This includes no loading, unloading or organizing of construction materials, tools, trash, cones or signage.

## Apprentice and student learner exception

### Exception: “work-study program” 570.36

- If all the criteria of this exception are met, then 14- and 15-year-olds can engage in activities during the school day and for more than three hours per day. It does NOT change the types of activities 14- and 15-year-olds can do.

### Criteria:

- Student must be enrolled in a school program authorized by a school that provides education on workplace safety.
- A teacher-coordinator must be identified who supervises the program and makes regular visits to the sites to ensure safety and compliance.
- There must be a written agreement among the teacher, Habitat, the student and a parent outlining the duties of the student, the number of hours, and the ways in which all safety and FLSA standards will be met.

# Under 14 years old

## Under 14 years old

### Legal or HFHI policy standard

Students younger than 14 should volunteer for your affiliate only if your affiliate has a policy in place that specifies volunteer activities for children younger than 14, and if the activities are performed under appropriate supervision in designated safe areas that are away from potential hazards.

### Practical implications

#### May engage in these activities

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- Making a recipe scrapbook for a new homeowner.
- Making volunteer cards and candy bags.
- Putting together a welcome basket for a new homeowner.
- Making decorative photo frames for homeowners or volunteers.
- Putting together a photo album for homeowners.
- Decorating light switch covers.
- Holding a two-by-four-signing fundraiser.
- Decorating flower pots.
- Holding a trick-or-treat for change event.
- Holding a rake-a-thon fundraiser.
- Holding a gingerbread house building contest.
- Holding a Lego build contest.

#### May *NOT* engage in these activities

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In addition to all the restrictions for 16- and 17-year-olds and 14- and 15-year-olds, volunteers younger than 14 must be properly supervised and engage only in age-appropriate activities subject to the Habitat affiliate's written policy.

Other activities for youth 14 and younger can be found at [habitat.org/volunteer/near-you/youth-programs/resources](https://www.habitat.org/volunteer/near-you/youth-programs/resources).







## Additional information

For further details, see Policy 21 of the U.S. Affiliation Agreement and the related Legal Advisory. In short, your affiliate must be aware of child labor laws that have been enacted by the federal government through the Fair Labor Standards Act (FLSA) (29 CFR Part 570) and each state, along with safety standards issued by the U.S. Department of Labor's Occupational Safety and Health Administration (OSHA). Although the laws reference paid employees, affiliates must also apply these standards to all youth volunteers. Courts would likely apply these standards when determining an affiliate's proper standard of care in engaging youth volunteers. In addition, affiliates should provide a safe volunteer environment for all young volunteers, including age-appropriate activities and adequate supervision and training.

For more information or specific questions, please contact [volunteer@habitat.org](mailto:volunteer@habitat.org).



# every hand

can make a difference



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