



GUAM **WATERWORKS** AUTHORITY

YOUTH EMPLOYMENT WORKPLACE POLICY TRAINING

JUNE 27, 2025 | PRESENTED BY: MARYANN AGUILAR

INTRODUCTION

This training reflects **Guam Waterworks Authority's (GWA) guiding principles** and commitment to fostering a **safe, structured, and productive work experience** for minors employed or placed within our workplace. Our approach ensures full compliance with **applicable federal and local child labor laws**, reinforcing ethical employment practices while providing valuable opportunities for youth development.

Through this initiative, GWA remains dedicated to maintaining a **work environment that prioritizes safety, education, and professional growth**, ensuring that all temporary youth employment aligns with established legal standards and best practices.

TRAINING OBJECTIVES

- To obtain and ensure a clear understanding of the procedures and guidelines for the temporary employment of minors within the GWA workplace.
- Understand your responsibilities regarding GWA's Youth Employment Workplace Policy.

This training emphasizes the importance of compliance with the established SOP and aligns with GWA's commitment to adhere to all federal and local statutes as it relates to child labor laws.



DEFINITIONS



EMPLOYEES

All employees who are temporarily employed by GWA through the government of Guam's Youth Employment Program, internship, apprenticeships, or any other work-experience programs in coordination with schools or government department or agency.



GWA VEHICLES

All vehicles whether owned, leased, or rented by GWA.



MINIMUM AGE STANDARDS FOR TEMPORARY EMPLOYMENT OR PLACEMENT

minimum age shall be fourteen (14) years.



MINOR

anyone under the age of eighteen (18) and over the age of thirteen (13).



OUTSIDE HELPER

Any individual, other than a driver, whose work includes riding on a motor vehicle outside the cab for the purpose of assisting in transporting or delivering goods. The law prohibits minors from being an outside helper.



LIMITATIONS



- **ALL** temporary employment or placement of minors in a GWA workplace is **LIMITED TO**:
 - Guam's Youth Employment Program;
 - Internships; and/or
 - Work-experience programs in coordination with their schools or government agencies.
- **ALL** terms and conditions of temporary employment in these programs (number of working hours, working conditions, and types of work to be performed) **MUST COMPLY** with the applicable federal and local child labor laws.
- **NO CHILD UNDER THE AGE OF FOURTEEN (14)** may be temporarily employed or placed for educational or experience training in a GWA workplace.
- **14- AND 15-YEAR-OLDS** may only be employed **FOR OFFICE/ADMIN WORK** that is **NOT** performed on a GWA vehicle or at the actual construction site.*

*According to the USDOL Child Labor Provisions for Nonagricultural Occupations under the FLSA



LIMITATIONS

- **NO** minor **UNDER THE AGE OF (18) YEARS** may be employed in nonagricultural occupations declared **HAZARDOUS OR DETRIMENTAL** to the life, health, morals, safety, or well-being of minors.* Examples of **PROHIBITED** tasks include but are not limited to:
 - Working on **SCAFFOLDING** or **LADDERS**;
 - **DRIVING** an official vehicle and/or being an **OUTSIDE HELPER**;
 - Operating (or assisting in operating) any powered machinery other than office equipment; and
 - **TRENCHING OR EXCAVATION MORE THAN FOUR (4) FEET** or performing any tasks in an active GWA work zone.
- Limited exemptions apply under certain conditions approved and conducted by or under the auspices of a governmental agency. See **SOP Section 6.1.3.1** for details.

*According to the USDOL Child Labor Provisions for Nonagricultural Occupations under the FLSA and 19 GCA Ch. 11 Section §11105



HAZARDOUS OCCUPATIONS PROHIBITED FOR ALL MINORS



1. Manufacturing and storing of explosives.
- 2. Driving a motor vehicle and being an outside helper on a motor vehicle.**
3. Coal mining.
4. Forest fire fighting and fire prevention, timber tract management, forestry services, logging, and saw mill occupations.
5. Power-driven woodworking machines.
6. Exposure to radioactive substances.
- 7. Power-driven hoisting apparatus.**
8. Power-driven metal-forming, punching, and shearing machines.
9. Mining, other than coal mining.
10. Meat and poultry packing or processing (including the use of power-driven meat slicing machines).
11. Power-driven bakery machines.
12. Balers, compactors, and paper-products machines.
13. Manufacturing brick, tile, and related products.
- 14. Power-driven circular saws, band saws, guillotine shears, chain saws, reciprocating saws, wood chippers, and abrasive cutting discs.**
15. Wrecking, demolition, and shipbreaking operations.
16. Roofing operations and all work on or about a roof.
- 17. Excavation operations.**



LIMITATIONS: NON-PERMISSIBLE WORKING HOURS*

14 - & 15 - YEAR OLDS

- May not work during the time the minor is legally required to attend school, **EXCEPT** as provided in school work experience or career exploration programs.
- **SCHOOL DAYS:** Maximum 3 hours/day
- **NON-SCHOOL DAYS:** Maximum 8 hours/day (combined work and school hours shall not exceed 9 hours/day)
- **SCHOOL WEEK:** Maximum 18 hours/week
- **NON-SCHOOL WEEK:** Maximum 40 hours/week
- May not work after 7:00 PM; **EXCEPT** from June 1 through Labor Day, may work until 9:00 PM
- May not start work before 7:00 AM
- May not work for more than four (4) hours continuously without an interval of at least thirty (30) minutes for lunch or a rest period.

16 - & 17 - YEAR OLDS

- May not work during the time the minor is legally required to attend school.
- Maximum 8 hours/day
- Maximum 40 hours/week
- **SCHOOL NIGHTS**:** May not work after 10:00 PM;
- **NON-SCHOOL NIGHTS**:** May work until 12 midnight
- May not start work before 6:00 AM
- May not work for more than four (4) hours continuously without an interval of at least thirty (30) minutes for lunch or a rest period.

*Some exceptions apply in certain conditions (i.e., minor who has graduated from high school, has supporting dependents, etc.). See **SOP Sections 6.1.2.1-6.1.2.2** for details.*



PROCEDURES

1. REQUEST FOR TEMPORARY EMPLOYMENT OR PLACEMENT OF MINORS

- Supervisors, Managers, or Administrators must submit a **Memorandum of Request for Temporary Employment** to HR for compliance review and submission for the GM's approval **prior to placement**.
- HR must work with the requesting officer to ensure that the request includes **all applicable documentation** required as a Host Employer to include but not limited to:
 - A copy of the **Certificate to Employ a Minor** from Guam Department of Labor (GDOL) Wage and Hour Division (for 14- and 15-year-olds only);
 - Proof of age documentation*
 - Work schedule of permissible hours of work; and
 - Description/List of tasks or types of work and office equipment to be used.

CERTIFICATE NO. WHD-CLC- 001 - 23

Certificate TO EMPLOY A MINOR

DEPARTMENT OF LABOR

Name of Minor: **JOE CRUZ**

Date of Issuance: **10 JANUARY 2023** Date of Expiration: **09 JANUARY 2024**

Address: **P.O. BOX 1234 BARRIGADA, GU 96921**

Gender: **MALE** Date of Birth: **15 FEBRUARY 2004** Place of Birth: **TAMUNING, GU**

Documents submitted for proof of age: ☒ Guam ID ☒ U.S. Passport ☒ Birth Certificate

Occupation: **BAGGER** Hourly Rate: **9.25**

Name of Employer: **SUPERMARKET**

Address of Employer: **1234 ST. HAGATNA, GU 96910**

Industry: **RETAIL** Employer's Contact Number: **(671) 472-1234**

MINOR'S SIGNATURE

SIGNATURE OF ISSUING OFFICER

DIRECTOR OF LABOR

ISSUED PURSUANT TO CHILD LABOR LAW, 1984 CHLDA.
TO VERIFY AUTHENTICITY OF THIS CERTIFICATE, CONTACT THE WAGE AND HOUR DIVISION AT:
TEL: (671) 300-4601 / EMAIL: WAGE.QUESTIONS@DOL.GUAM.GOV

ORIGINAL - Employer GREEN - Office Copy PINK/PURPLE - Employer's Copy

*Birth or baptismal certificate, passport or visa, Guam ID or driver's license, or any bona fide documentation indicating age and DOB

PROCEDURES

- 2. HR COMPLIANCE REVIEW:** HR will review all requests for underage temporary employment, *Employer Self-Assessment* forms, and any other pertinent forms to ensure compliance with USDOL Child Labor laws, regulations, and guidance.
 - Assessments of proposed access to and use of facility location(s) work sites/work zones, supplies, office equipment, and adequacy of proposed supervision will be coordinated by HR with the respective supervisor of the temporary employee with the support of the Safety Inspector Supervisor.
- 3. GM REVIEW AND APPROVAL:** All necessary documents for review and approval will be transmitted by HR via DocuSign to obtain the GM's approval.
- 4. SUPERVISION:** Once the GM approves the request and the minor is employed, the Supervisor, Manager, and/or the Administrator will be held responsible for ensuring that the minors under their supervision are in compliance with the applicable restrictions.
 - In addition, minors must be closely supervised to ensure that their morals, safety, health, and compulsory education are not compromised in any way.

PROCEDURES

5. PERMISSION TO LEAVE GWA WORKSITE: Minors must inform their immediate Supervisor, Manager, and/or Administrator:

- The location and duration of any time they are away from the worksite;
- If they are unable to report to work, including cases of tardiness;
- If they will be returning late from lunch.
 - Minors are allowed a maximum of 1 hour for lunch break.
 - Minors who repeatedly return late more than twice a week will be counseled.

Parents/Guardians of the minor must complete the *Permission to Leave GWA Worksite Slip* and submit it to the minor's direct Supervisor, Manager, and/or Administrator at any time their child is to leave their assigned work area during the work day.

PROCEDURES

6. USE OF PERSONAL MOBILE DEVICES DURING WORKING HOURS:

- Minors should not use their personal mobile phones during work hours, except during scheduled breaks, in case of emergencies, or when contacting their ride at the end of their shift.
- Recording or posting photos or videos taken in the workplace to social media is strictly prohibited, unless when required for school assignments or internship documentation/reporting purposes and only with prior consent from a direct Supervisor, Manager, or Administrator.
- These policies are for maintaining a professional work environment and protecting confidentiality standards.
- Supervisors, Managers, and/or Administrators are encouraged to address violations immediately, and preferably in private, unless it is necessary to address the group.

In addition, the following actions will be taken:

- First infraction: Written counseling
- Second infraction: Written reprimand
- Third infraction: Termination

PROCEDURES

7. CONFIDENTIALITY

- Sharing or disclosing any confidential information outside the workplace without authorization is strictly prohibited.
- Minors temporarily employed by GWA must agree to maintain the confidentiality of all sensitive information and comply with all related policies by signing the required *Confidentiality Agreement* prior to starting work.

8. AMERICANS WITH DISABILITIES ACT (ADA) COMPLIANCE

- GWA will provide reasonable accommodations to minors with disabilities to ensure they can fully participate in the youth employment program.
- Minors and/or their parents or guardians should inform GWA of any disability-related needs so that appropriate accommodations can be arranged.



RECORDKEEPING

- **HR is the official repository of all internal and external documents relative to the minor's term(s) of temporary employment or placement at GWA.**
- **Documents authorizing employment of minors or students must be retained for 3 years after last effective date (29 CFR §516.5)**

ESTABLISHING & PROMOTING AWARENESS

▪ EMPLOYEE TRAINING



- HR shall conduct training sessions on child labor laws and this SOP for employees on a voluntary basis, recommended by respective supervisors or managers.
- Supervisory personnel: Required to complete this training every 5 years.
 - Any supervisor assigned to oversee a minor during an active youth employment program must complete refresher training prior to the program's commencement.
- Employees who are hired or promoted into a supervisory position must receive training within 60 days of hire or promotion.
- New hires: Training shall include awareness of GWA's compliance during new hire on-boarding and orientation.

ESTABLISHING & PROMOTING AWARENESS

▪ **EMPLOYEE ORIENTATION FOR MINORS**

- HR shall provide a modified New Hire orientation specifically tailored to the minors temporarily employed by GWA with a focus on:
 - Child Labor laws
 - HR Information
 - Utility 101
 - Facility Tour - The minors are prohibited from bringing their personal mobile devices during the facility tour, as directed by the GM.
- The minors must acknowledge their understanding and compliance with all federal and local child labor laws as well as GWA's Youth Employment Workplace Policy.

▪ **SUPPLIER AND CONTRACTOR AWARENESS**

- The Supply Management Administrator (SMA) shall include a provision referencing DOL citations to resource materials in all solicitations to ensure suppliers and contractors are fully aware of the regulations they must adhere to.
- Suppliers and contractors must acknowledge their understanding and compliance with all federal and local child labor laws through the *Acknowledgment Receipt* form.



ESTABLISHING & PROMOTING AWARENESS

▪ INTERNAL COMMUNICATION

- Informational posters in common areas;
- Articles in Weekly Employee Update; and
- Intranet page dedicated to DOL information.

▪ EXTERNAL COMMUNICATION

- External page on GWA website dedicated to affirming GWA's awareness and activity to ensure compliance with DOL regulations;
- Social media posts on Facebook and Instagram; and
- Partner with GDOL to conduct training/orientation presentation and public outreach messaging for the SYEP.

COMPLIANCE MONITORING & REPORTING

▪ GWA ANONYMOUS REPORTING HOTLINE:

- Managed by the Internal Audit Division, allows anonymous and confidential reporting of concerns.
- Email: hotline@guamwaterworks.org
- GWA Website: www.guamwaterworks.org
- Divisions > Internal Audit > GWA Online HOTLINE Report Form
- In-Person Dropbox: Fraud, Waste & Abuse Reporting Form



To report suspected fraud, waste, or abuse you can call (671) 300-6855, email: hotline@guamwaterworks.org or use our online Hotline form below:

 [GWA Online HOTLINE Report Form](#)

- Locations: Upper Tumon, Julale, and Fadian Offices
- Phone: (671) 300-6855

▪ GDOL WAGE AND HOUR DIVISION:

- For reporting of complaints or suspected violations.
- Email: wage.questions@dol.guam.gov
- Phone: (671) 300-4602 or (671) 475-7024



NON-COMPLIANCE

▪ EMPLOYEES

- Failure to adhere and comply with any of the guidelines, policies, and procedures stated herein may result in progressive or adverse disciplinary action, including but not limited to suspension, demotion, or termination of employment as provided by GWA Personnel Rules and Regulations (PR&R).

▪ SUPERVISORS & MANAGERS

- Failure to report and enforce all the guidelines, policies, and procedures stated herein may result in progressive or adverse disciplinary action, including but not limited to suspension, demotion, or termination of employment as provided by GWA PR&R.

RESOURCES & SUPPORT

▪ HUMAN RESOURCES DIVISION

- **Ms. Zina Pangelinan-Charfauros**
gwahr@guamwaterworks.org



Guam DOL Child
Labor Law
Booklet

▪ INTERNAL AUDIT (IA) DIVISION

- **Ms. Janet Taitano-Arroyo**
hotline@guamwaterworks.org



19 GCA Ch. 11
Child Labor Law

▪ COMMUNICATIONS OUTREACH PROGRAM DIRECTOR

- **Mr. Nicholas Lee**
nrlee@guamwaterworks.org



Child Labor
Provisions under
FLSA (USDOL)

REMEMBER: Read and use the training materials provided, provide feedback or questions
AND let us know if you need **HELP**.





Q&A OPEN DISCUSSION