

## Under 18 Students in Residences Policy

**Policy Category:** Estates and Facilities – Kings Residences

**Subject:** Resident U18 Policy

**Approving Authority:** Philip Cox – Associate Director for Kings Residences

**Responsible Officer:** Phil Cox

**Responsible Office:** Kings Residences

**Related Procedures:**

Prolonged Lack of Contact Procedure:  
<https://www.kcl.ac.uk/assets/policyzone/governancelegal/safeguarding-procedure8.pdf>

Missing Persons Procedure:  
<https://www.kcl.ac.uk/assets/policyzone/governancelegal/safeguarding-procedure11.pdf>

Student of Concern Procedure:  
<https://www.kcl.ac.uk/assets/policyzone/students/student-of-concern-procedure.pdf>

Reporting A Safeguarding Concern Procedure:  
<https://www.kcl.ac.uk/assets/policyzone/governancelegal/safeguarding-procedure3.pdf>

Safeguarding Roles and Responsibilities:  
<https://www.kcl.ac.uk/assets/policyzone/governancelegal/safeguarding-procedure1.pdf>

**Related College Policies:**

- [Accommodation Policy](#)
- [Data Protection Policy](#)
- [King's Residences License to Occupy](#)
- [Safeguarding Policy & Procedures](#)
- [Residences Disciplinary Policy](#)

**Effective Date:** 1st September 2024  
**Supersedes:** 1<sup>st</sup> September 2023  
**Next Review:** January 2025

**I. Purpose & Scope**

The purpose of the Under 18 Policy in King’s Residences is to:

- Safeguard the welfare of persons under the age of 18 years old who are resident or guest in its premises.
- Provide guidance on arrangements offered to protect the personal safety and social wellbeing of those under 18 years of age.
- Ensure the relevant legislation is adhered to for the safeguarding of persons under the age of 18 in alignment with the British council recommendations.

**II. Policy**

- **Policy Location:** SharePoint
- **Policy Issue Date:** 06/12/2018
- **Version & Date of Last Review:** Version 7.0 – February 2024
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### Change History

<b>Policy Version</b>	<b>Effective Date</b>	<b>Significant Changes</b>
<b>1.0</b>	<b>30 August 2017</b>	
<b>2.0</b>	<b>6 December 2018</b>	
<b>3.0</b>	<b>3 March 2020</b>	
<b>4.0</b>	<b>9<sup>th</sup> March 2021</b>	
<b>5.0</b>	<b>May 2022</b>	Updated names and titles, updated links, updated clauses. Changes to COVID section to bring more in line with current health and safety guidance.
<b>6.0</b>	<b>August 2023</b>	Updated names and titles and grammar. Updated links to check in forms. Included new protocol appendix, NOK escalation, 23/24 QR codes and SOP. Updated link to U18 disciplinary. Removal of COVID section to align with health and safety guidance.
<b>7.0</b>	<b>February 2024</b>	Updated names and titles and grammar, standardised all reference to students as 'U18 students', added in new conduct involvement and escalation, included resillife U18 event involvement, clarified appropriate NOK outreach, added appendices of U18 SOP. Updated links and forms, included clause on exiting contract prior to turning 18. New format for introduction, policy purposes.

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## **Introduction**

This policy is governed by the [College's Safeguarding Policy](#) and is supported by the current Licensing Agreement for 2024/25. Thus, they should be read together for a fuller understanding of the arrangements and conditions attached to the housing of persons under the age of 18 years in King's Residences. Thus, they should be read together for a fuller understanding of the arrangements and conditions attached to the housing of persons under the age of 18 years in King's Residences.

## **Policy Statement**

King's Residences will not assume parental responsibility for students under 18 who are residing or visiting its residences. Students and visitors under the age of 18 and their families or carers should recognise that King's Residences are homes and places of work comprising of adults. Students residing in King's Residences are expected to demonstrate competence and readiness to live independently and alongside people from diverse backgrounds and ages. In housing students under 18, it is the aim of King's Residences to respect their independence, whilst also extending an enhanced duty of care in accordance with UK law and British Council recommendations, as well as and good safeguarding practice.

## **Application of this Policy**

This policy applies to all students holding a Kings Residences license and are residing in a King's College London managed residence, whose 18<sup>th</sup> birthday falls after the start date of the accommodation agreement. The policy ceases to apply once students residing in King's Residences reach their 18<sup>th</sup> birthday.

Parental/Guardian sign-off is a requirement for acceptance of the online contractual agreement.

Legally, persons under the age of 18 do not have capacity to hold legal estate; however, they may enter into contracts for 'necessaries', such as accommodation and education.

For applicants who will be under 18 when accepting a King's Residence Agreement, the Agreement will be held on trust until the applicant reaches the age of 18. During that time, the resident will enjoy all the rights set out in this Agreement and be subject to all the obligations contained in it. When the resident will reach 18, they will be entitled to terminate the Agreement in accordance with clause 4.1.1. If the resident chooses not to do so, the Agreement will be legally binding upon the resident. King's Residences primarily accommodates persons aged 18 and over, with the following exceptions:

## **Term-Time Accommodation for Full-time Students**

Persons aged 16 or 17 who are enrolled as full-time students of the university may be offered accommodation in King's Residences.

This is to ensure that younger adults are better supported through a wider range of options for safe and secure housing in their transition to adulthood and adult environments. The Allocations Team will offer a place in a suitable King's managed residence, based on the information provided by students in their application as well as rooms availability. The Residence Safeguarding Administrator will work alongside the allocations team to ensure all students under the age of 18 live together and are housed by correlating birthdays to ensure their safety and wellbeing.

## **Welfare Support**

All students at King's Residences have access to the [College's welfare support network](#). Within residences, the Residences Safeguarding team, led by the U18 Administrator, will act as the main point of contact for daily monitoring and support of U18 students. They can be contacted 7 days a week (9:00-17:00) through [Resisafeguarding@kcl.ac.uk](mailto:Resisafeguarding@kcl.ac.uk).

There are teams of live-in [Welfare Leads](#) and Community Facilitators responsible for out-of-hours welfare and community support within residences. Students aged under 18 will be allocated in single rooms with ensuite facilities within suitable residences. Community Facilitators and Welfare Leads are not a professional support service but will act as a pastoral lead and act as an accessible point of contact for under 18 students living in King's Residences.

Student Services provide ongoing support for students who are aged under 18 and the Advice, Wellbeing & Welfare teams act as a first point of contact for any students who require personal or practical support. More information on how to contact your wellbeing advisor can be found through this [article](#) or online at [Student Services online](#).

### **Access to Rooms Occupied by Under 18 Students.**

All staff in King's Residences hold a clear, enhanced DBS certificate. Where possible, staff requiring access to rooms occupied by minors, in the performance of necessary cleaning, works and inspections, will be accompanied by another DBS-checked member of staff.

### **Expectations:**

#### **1. [Residence Events and Activities](#)**

Participation in Residence Life events and activities in their King's residence is open to students aged under 18. King's Residences will take reasonable steps to ensure that UK laws are not broken within its premises such as serving alcohol or showing non-age-restricted films and other media. In the case of resilife events, the residence under 18's administrator will cross reference lists of attendees with the Community Engagement Officer to identify and confirm any Under 18 student participants. Where the events will be serving alcohol, Community Facilitators will ID check and wristband any under 18 students. The events will also have a designated Resident welfare lead present and the staff reserve the right to ask students for proof of age.

#### **2. [King's Residences Discipline Policy](#)**

Students under 18 will be held to the Residence Disciplinary Policy. Under 18's in breach of the accommodation agreement with King's Residences, including policies surrounding controlled substances and age restricted media, will be subject to disciplinary action in accordance with the [Residences Disciplinary Policy](#). King's Residences may also report suspected and substantiated cases of underage drinking and consumption of illegal substances to the central university [Student Conduct and Appeals team](#). Please refer to the Kings Residence Disciplinary Policy (Section 17).

#### **3. [Visitors](#)**

Day and overnight visits by adults to students aged under 18 are normally allowed and will be subject to the same terms and conditions set out in the accommodation agreement. Visits to minors in residences will not be supervised by King's Residences staff. Parents, carers, or legal guardians may, on written request, restrict visitor access to minors in residences. King's Residences will seek to enforce such restriction as is reasonably possible, but may not claim responsibility in cases of unreported visits or illicit entry.

#### 4. Leaving the Residence

Under 18 students are required to inform the Residences Safeguarding Team in writing when they are planning to be away from residences for more than 24 hours. This can be done by uploading a [Holiday and Absence form](#) or emailing [resisafeguarding@kcl.ac.uk](mailto:resisafeguarding@kcl.ac.uk) and must be completed stating the dates from when the student will leave until they return. This applies for all instances of leaving residences including scheduled reading weeks, term breaks or individual trips. It is the parent, carer or legal guardian's responsibility to ensure that under 18 students have a safe place to stay when away from the residence for trips or overnight stays.

#### 5. Card Activity Monitoring

The University has a duty of care to make sure students remain safe. Student wellbeing is important to us, so as part of the safeguarding responsibilities, the Residences Safeguarding Team will be monitoring daily student card activity of our under-18 students within residences.

It is the responsibility of the student to ensure they either; use their card on a reader within residence, submit the [Under 18's online daily check in form](#) or email the Residence Safeguarding Team each day before 10am (including weekends), otherwise the missing persons process will need to be initiated.

It is important that the student card is used at least once every 24 hours (including weekends) on the access card readers within designated U18 residences (Great Dover Street and Stamford Street Apartments). Access card readers are located on most doors or barriers in all buildings throughout Kings College London.

If students wish to remain in their rooms for a period of more than 24 hours or are unable to leave their residence for example, if they are unwell, they may also use the [Under 18's online daily check in form](#). This form must be filled in once a day by 10AM for each day that the student is unable to use their student ID card on an access card reader.

If there is no card activity in period over 24 hours and the student has not used the Daily Check-In Form, the Residences Safeguarding Team will start the Under 18s missing persons protocol, which includes several attempts to contact the student before escalating further. If no contact is made within 2 hours from the start of the process, the student may be reported to the Police as a missing child. More information on the process will be shared with the students closer to the arrival weekend as well as during the induction meeting throughout the academic year.

### **Induction to Residences:**

All Residents must complete an online Health and Safety induction prior to arrival. All students under the age of 18 must attend a Residences Induction during the Welcome Week to get an overview of living in Residences.

In addition, it is also mandatory to attend the Under 18s Induction meeting, organised by The Residences Safeguarding Team. The induction will include an overview and aims of the Residences Safeguarding Team. It will also include the safeguarding responsibilities and monitoring that will be undertaken until students will turn 18 years old.

### **Health and Safety:**

Adhering to the Government and College recommendations, we have adapted some of our processes so that we can provide better support to our students aged under 18 living in residences. The [Under](#)

**18s Online Check In Form** exists to help students who have not used their student ID card on an access reader in the previous 24-hour period. This form must be used by 10AM everyday (including weekends). In addition, students can submit a **Holiday and Absence form** to communicate with the Safeguarding team when they will be out of residences or confined to their room due to illness for example. This will ensure the Residences Safeguarding team are aware of their absence and can provide support if needed.

If in-person induction meetings cannot take place, The Residences Safeguarding Team will regularly communicate with under 18s via email, text, phone calls, digital meetings and events and newsletters. Students aged under 18 must follow all health and safety guidelines in their residences as recommended by the College.

### **Next Of Kin:**

There may be instances where Next of Kin (NOK) is contacted. The Residence Safeguarding Team will outreach in situations surrounding:

- Missing person escalation with late check in: the Residence U18 Administrator will attempt to communicate via calls and text with the given N.O.K of the student to ensure they can account for the under 18 students safety.
- N.O.K general inquiries relating to residences: the Residence U18 Administrator is available to communicate regarding general residence based questions. For example: room concerns, general guidance.
- Change in living arrangements of U18 students: if an under 18 student wishes to move out from the residence before turning 18 years of age - the NOK of the student must communicate with the residence U18 Administrator to ensure they have provided documentation of the U18 student moving to live with a parent/guardian in the UK. This can be done by emailing [resisafeguarding@kcl.ac.uk](mailto:resisafeguarding@kcl.ac.uk) and attaching proof of documentation. Any further queries relating to the Residences Licencing Agreement (for example the financing) need to be directed to the Allocations team at [kingsresidences@kcl.ac.uk](mailto:kingsresidences@kcl.ac.uk).

Further communication with Next of Kin will be escalated to the relevant Student Services teams in instances where the university believe there are concerns about the Under-18s safety and/or welfare. The Student of Concern management group may contact the Next of Kin to discuss these concerns further.

### **Summer Accommodation for Guests under the Age of 18**

During the summer vacation, King's Residences, in partnership with King's Venues, may accommodate children or groups of children aged 14 years or older who are participating in study programmes or organised school trips with the supervision of group leaders, teachers, carers, or family members. The College reserves the right at its sole discretion to refuse any booking made by or on behalf of minors in circumstances where it believes that the minor/s will not be sufficiently accompanied and supervised.

At the time of booking, King's Venues will establish the ages of any summer guests to ensure they are booked into suitable accommodation and will confirm at the time of booking that groups with children have designated responsible adults at a ratio of at least 1 adult for every 10 children.

- Group leaders or co-ordinators will be asked by King's Venues to complete a risk assessment for the accommodation of minors at King's residences.



- Group organisers will be provided with details of their responsibilities in writing at the time of booking, e.g. levels of supervision required at specified times and details of their responsibilities regarding fire safety etc.
- A mixed-sex group of children will be accompanied by a corresponding ratio of male and female staff. Staff/teachers will be responsible for escorting children within college premises and providing any necessary supervision e.g. using baths and showers.
- Separate male and female sleeping, and bathroom facilities will be provided.
- Group leaders will need to organise adequate nighttime supervision arrangements. If children cause noise or disturbance to other guests, Reception will contact the designated nighttime supervisor/s who will enter the bedrooms concerned.
- Unaccompanied Reception and/or Residence staff will not enter bedrooms occupied by children aged under 18, whilst children are present, except in an emergency.
- Visiting groups should be supported by enough staff who are fluent in both English and the mother tongue of any under 18's in their care so that they can translate if necessary.

### **Additional Conditions that Apply to all Students or Guests Under 18 Years of Age in King's Residences:**

#### 1. Visitors & Guests under the Age of 18:

Visitors/guests under the age of 18 may come to the residences to visit individual residents during the day or overnight, in accordance with the visiting privileges set out in the accommodation terms and conditions. Children may also visit a residence as part of a College Open Day. Local security procedures require visitors to be signed in and out. The presence of visiting minors in the premises will be monitored, as far as is possible, by the residence staff for their safeguarding. Minor supervision, however, will be the responsibility of College Open Day co-ordinators or the individual resident accepting the visit.

#### 2. Trespassers:

Children may not trespass into residence grounds or buildings; such unauthorised visitors are covered by the Occupiers' Liability Act. In the event of trespassers who are identified as young persons or children, Residence staff will summon other members of staff and the police to assist.

#### 3. Photographs, videos, websites and cameras:

Photography and filming on college premises and the publication and distribution of images of College facilities may only take place with prior permission from King's College London. King's Residences, other organisations, groups, and individuals should obtain a written consent from the minor and his/her parent, carer or legal guardian before taking and using images of minors in any format. When publishing, the minor's full name must not be attached or associated with his/her image.

### **Risk Assessments**

Risk assessments should be based on the potential hazards in the specific residence, flat and room. The Residence Manager in consultation with relevant Student Services teams will ensure that an assessment of the risks involved in under 18's in the residential premises is undertaken before the period of accommodation agreement commences and updated as soon as new or previously

unforeseen hazards are made known or as new residential activities and considerable changes in the environment occurs.

Risk assessments following the template in the Safeguarding Policy should be carried out to cover the following situations:

- Persons under 18 who are offered accommodation in a college residence without a parent or guardian to accompany them;
- Visiting families with children who are accommodated at residences suitable for children;
- Visitors under the age of 18 who visit individual residents during the day or overnight guests or as part of a College Open Day; and
- Unauthorised children who trespass into Residence grounds/buildings;
- External residence life events.

### **GDPR:**

Although students aged under 18 are regarded as minors under the law, the GDPR protects their right to privacy. King's Residences owe the duty of confidentiality to the minor and not the parents, carers or legal guardians, and will thus correspond with the former in matters pertaining to their accommodation agreement.

King's Residences staff will obtain consent of the minor before releasing information to a parent or other party (unless information release has been pre-agreed by both minor and parent/guardian in a written agreement). The only time we may proceed to disclose information without the consent of the student, is where it is deemed necessary to reduce or avoid harm to the minor and/or to others.

# Appendix 1: U18 Monitoring Protocol

SOP: Standard Operating Procedure: Residence U18 Missing Persons Protocol.

