

Under 18 Students in Residences Policy

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| 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: | <p>Prolonged Lack of Contact Procedure: https://www.kcl.ac.uk/assets/policyzone/governancelegal/safeguarding-procedure8.pdf</p> <p>Missing Persons Procedure: https://www.kcl.ac.uk/assets/policyzone/governancelegal/safeguarding-procedure11.pdf</p> <p>Student of Concern Procedure: https://www.kcl.ac.uk/assets/policyzone/students/student-of-concern-procedure.pdf</p> <p>Reporting A Safeguarding Concern Procedure: https://www.kcl.ac.uk/assets/policyzone/governancelegal/safeguarding-procedure3.pdf</p> <p>Safeguarding Roles and Responsibilities: https://www.kcl.ac.uk/assets/policyzone/governancelegal/safeguarding-procedure1.pdf</p> |
| Related College Policies: | <ul style="list-style-type: none">- Data Protection Policy- Residences Accommodation Policy- Residences License Agreement- Safeguarding Policy & Procedures- Residences Disciplinary Policy- Duty of Care Statement |

Effective Date: 1st September 2025

Supersedes: 1st September 2024

Next Review: January 2026


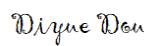

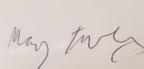
I. Purpose & Scope

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:** KCL Policy Hub
- **Policy Issue Date:** 06/12/2018
- **Version & Date of Last Review:** Version 8.0 – February 2025
- **Effective Date:** 1st September 2025
- **Supersedes:** Previous Version 7.0 – February 2024
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| | NAME | JOB TITLE | SIGNATURE |
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| Reviewer | Diyue Dou | Residences U18 Administrator |  |
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Change History

| Policy Version | Effective Date | Significant Changes |
|----------------|----------------------|--|
| 5.0 | May 2022 | Updated names and titles, updated links, updated clauses. Changes to COVID section to bring more in line with current health and safety guidance. |
| 6.0 | August 2023 | 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. |
| 7.0 | February 2024 | Updated names and titles and grammar, standardised all reference to students as 'U18 students', added in new conduct involvement and escalation, included Resilife 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. |
| 8.0 | February 2025 | Updated names and titles and grammar, added in protocols on contacting under 18 students using WhatsApp/Messages/WeChat, clarified expectations on daily check-in duties and responsibilities on reporting leaving the residences Updated links and forms, updated appendices of U18 SOP. |

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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.

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 18th birthday falls after the start date of the accommodation agreement. The policy ceases to apply once students residing in King's Residences reach their 18th birthday.

The Parental/Guardian co-signature is a requirement for acceptance of the residence's license agreement. Legally, persons under the age of 18 do not have capacity to hold legal estate; however, they may enter contracts for 'necessaries', such as accommodation and education. The term-time address requirement is a key part of their agreement to study at King's for under 18 students. The designated term-time address must be either a King's residence or a residence with their legal guardian in the UK. Failure to comply with this condition or providing inaccurate information about living arrangements may result in disciplinary action or impact the student's enrolment status.

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 at 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.

The Welfare Support Team is responsible for out-of-hours welfare support within residences, providing pastoral care for students, including those under 18. Additionally, a team of Community Facilitators focuses on building a sense of community and organising events. Students under 18 will be allocated single ensuite rooms within suitable residences. The Welfare Support Team will serve as the pastoral lead and 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

1. 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).

2. 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.

3. 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 and must be completed stating the dates from when the student will leave until they return in residences. 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. During term time, if under 18 students need to request absence/holidays that are more than 2 weeks in duration, they need to undertake a meeting with the U18 Administrator and obtain consent from their parent/legal guardian prior to their absence. Failure to do this may involve us contacting their faculty to advise of their absence, and this may result in us contacting parent/legal guardian.

Clarification of Term-Time Address and Prolonged Absences

Under 18 students are required to reside, which by our definition, means under 18s sleep, store belongings, and spend daily time in the assigned room as their primary place of living, during the academic year as per the university safeguarding policies. Prolonged or repeated absences from residences, even if reported through the Holiday and Absence form, are not permitted unless explicitly agreed upon with the Residences Safeguarding Team and the student's parent or legal guardian.

Living outside of the designated residence without following proper procedures and gaining approval from the university constitutes a breach of the terms of the Under 18 Study Agreement and safeguarding policies. If such behaviour is identified, the university may wish to investigate and take further actions. Additionally, failure to maintain an accurate term-time address in line with university Under 18 study agreement could impact a student's enrolment status.

4. 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 and university holiday and closure periods), otherwise the missing persons escalation 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 10 AM 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.

If it is discovered that a student is frequently or permanently absent from their registered residence without proper authorisation, this will be escalated to the appropriate teams for review. Such cases may result in further action being taken, including the possibility of withdrawal from the university.

5. Protocols for Messaging Under-18 Students:

The Residences Safeguarding Team may need to contact under-18 students by WhatsApp/Messages/WeChat in certain circumstances. If a student does not respond to emails, phone calls and Microsoft Teams messages from the Residences Safeguarding Team regarding concerns about their safety and wellbeing, they may be contacted via WhatsApp, text messages or WeChat (a social media platform predominantly used by Chinese students, as many initially arrive in the UK without WhatsApp access due to China's internet firewall policies). For example, if an under-18 student has not completed their daily check-in by 10 am and has not responded to reminder emails, phone calls and Microsoft Teams messages sent by the Residences Safeguarding Team, they will be contacted via WhatsApp or text messages depending on whether they have a UK phone number (for international numbers, WhatsApp is more accessible). Chinese students who do not have WhatsApp or a UK phone number will be contacted via WeChat.

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. 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 prior to ensure they have provided documentation of the U18 student moving to live with a parent/legal guardian in the UK. This can be done by emailing 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. Only when the request is approved, should the under 18 students be able to live out of the residences.

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.

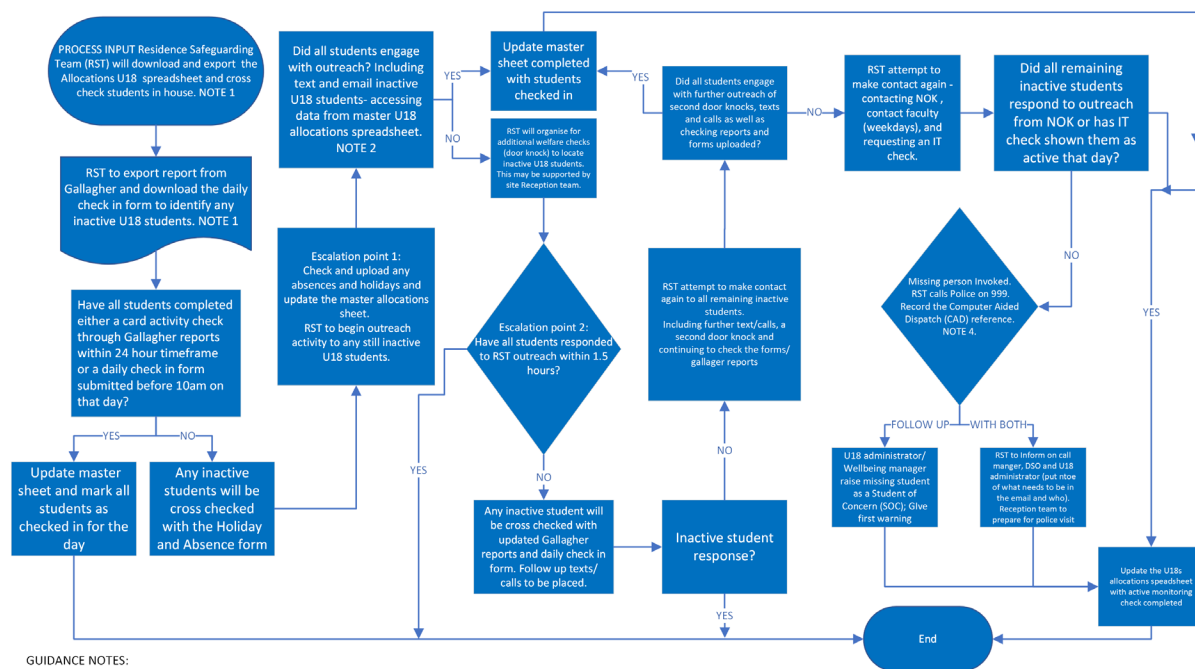
GDPR:

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.



GUIDANCE NOTES:

1. All documents needed for the U18s monitoring are found on Microsoft Teams site in the Resi Wellbeing Team, under the channel Resi Safeguarding in the Files tab.
 2. This text notifies the student that they have not checked in within the last 24 hours. Recommended text content: 'Hi! We notice you have not checked in as per your Under-18s monitoring in Halls. We need to make sure you are ok. Please respond to this text/email or fill in the daily check in form within 2 hours.'
 3. Reasonable checks carried out after 2-hour period include: door knock, Welfare Lead CMD check, check with inactive students flatmates about last time seen/communicated with, student faculty check, deeper Gallagher check, IT check.
 4. If at any time the missing student is found, Police must be made aware, dial 999 and quote the CAD number. A follow up meeting must be set up with the student to discuss the seriousness of not being able to locate them. A persistent offender should get a Written Warning.
- Process Owners: Associate Director for Kings Residence, Residences Wellbeing Manager; Participants: Under 18s administrator, Welfare Manager, Temporary Kings Talent Bank Staff, Reception Team, SOC team, On Call manager