

CROSSING LINES

REALITIES OF MIGRANT CHILDREN AT EU EXTERNAL BORDERS



Save the Children

Save the Children believes that every child deserves a future. In Europe and around the world, we work every day to give children a healthy start in life, the opportunity to learn and be protected from harm. When crisis strikes and children are most vulnerable, we are always among the first to respond and the last to leave. We ensure children's unique needs are met and their voices are heard. We deliver lasting results for millions of children, including those hardest to reach.

We do whatever it takes for children – every day and in times of crisis – transforming their lives and the future we share.

ACKNOWLEDGEMENTS

This research was carried out by Save the Children's European Migration Advocacy Group, in collaboration with Heartwarmingly consultancy.

Authors (in alphabetical order): Jennifer Allsopp, Anne-Lise Dewulf, Federica Toscano, Lina Vosyliūtė and Helena Wacko

Language Editor: Gail Rego

Design: YESNOW

Photo credits: Pekko Korvuo / Save the Children

Save the Children would like to extend their sincere gratitude to all those who contributed their time, knowledge, and support throughout the research process. Save the Children would also like to acknowledge the contributions of Veronica Boggini, Agapi Chouzouraki, Karolina Czerwińska, Giusy D'Alconzo, Vanessa Hernandez Delgado, Barbara Gonzalez Del Rio Diaz De Alda, Eftyxia Giannopoulou, Olga Jablonska, Celia Limpo Jimenez, Francesca Marconi, Klotildi Prountzou, Tatjana Ristic, Ana Maria Souto Rico, Maria Tsiota, Eveliina Viitanen, Jennifer Zuppiroli, Aikaterini Chrysanthi Zacharo, and the collaboration with Save the Children's local team at the Espacio Seguro in Las Palmas de Gran Canaria, the Greek Council for Refugees and Fundacion Cruz Blanca.

In particular, Save the Children wishes to express heartfelt gratitude to the children who generously shared their experiences of seeking safety in Europe. Their openness, courage, and resilience in telling their stories continue to inspire and guide our work every day. To protect their identities, their names have been changed.

PUBLISHED BY

Save the Children Europe

Rue Marie Thérèse 21

1000 Brussels Belgium

+32 (0)2 512 78 51

www.savethechildren.net

Cover photo: Save the Children

EXECUTIVE SUMMARY

KEY FINDINGS ON MIGRANT CHILDREN AT EU BORDERS: EXPERIENCES, TRENDS, PRACTICES, LEGAL DEVELOPMENTS, AND CONSIDERATIONS

INTRODUCTION AND BACKGROUND

The research focuses on **migrant children arriving at EU external borders**, with particular attention to unaccompanied and separated children, as well as families on the move. It highlights the complexities of the migration landscape across several countries, including **Greece, Finland, Italy, Spain/Canary Islands, and Poland**. This research combines academic literature, civil society reports, and empirical evidence, including interviews with practitioners and **Museum of Self** exercises with children on the move.

In recent years, several EU Member States have invoked security arguments to implement measures to deter irregular migration and enable the use of **exceptional procedures at border crossings**, with far-reaching consequences for children on the move. In 2022, a few EU Member States started talking about **instrumentalisation of migrants**, referring to the proven or perceived use of migration flows as a political tool by foreign governments to threaten Europe's stability. In practice, the framing of migration as a security issue has facilitated the implementation of measures that **disproportionately impact**

children, leaving them exposed to harsh conditions and potentially long-lasting harm.

This approach was used by national authorities to justify broader discretion to extend detention periods, deploy rapid processing techniques, close or reduce border access, ending up prioritising border control over individual rights. The consequences have been particularly **damaging for children**, as they run counter to established principles under the UN Convention on the Rights of the Child (UNCRC) and the European Convention on Human Rights (ECHR), which call for the prioritisation of a **child's best interests** in all actions concerning them. Migrant children, while pursuing their dreams and/or seeking safety in Europe, are frequently subjected to violence, exploitation, and difficult procedures and living conditions upon arrival.

In general, the current trend toward securitisation of borders raises profound legal and ethical questions regarding the treatment of migrant children. International human rights law, as outlined in instruments like the UNCRC and the ECHR, mandates that **the best interests of the child must be a**

primary consideration in all governmental actions. Yet, the prevailing practices often conflict with these obligations. Measures such as prolonged detention, inadequate identification and vulnerability assessment procedures, and asylum processes increasingly designed to obstruct access to protection, along with the externalisation of migration controls to third countries with inadequate child protection frameworks, not only undermine the dignity of the individual but also erode the legal safeguards designed to protect vulnerable populations. These practices highlight a critical disconnect between **security-driven policies and the fundamental rights** that should guide the treatment of all individuals, especially children.

In 2024, the EU concluded the negotiations over the Pact on Migration and Asylum, establishing new procedures and protection standards for children seeking asylum, set to be implemented by June 2026 in all Member States. This report from Save the Children aims to highlight the concerning reality that the new (border) procedures may not lead to the necessary improvements in legislation and practice at EU borders, but risk to consolidate and reinforce (border) practices that are already problematic. Although the new instruments contain some promising language to advance the best interests of the child, the implementation of redesigned procedures might systematically violate child rights both in normal circumstances and when derogations to the already frail protection standards apply.



IMPACT OF ‘EMERGENCY’ MEASURES AND POLICY CHANGES

Emergency laws and crisis-driven migration policies have increasingly overshadowed procedural and material rights, leading to harsher border enforcement across all countries examined in this research. The normalisation of emergency measures has resulted in diminished safeguards for children on the move. For instance, **in Poland**, the securitisation of migration policy has reached new heights, exemplified by the 2024 decision to frame the Polish Belarusian border crisis as a national security emergency. This shift, spearheaded by Prime Minister Donald Tusk, has driven efforts toward suspending asylum rights and further restrictions on humanitarian access, exacerbating vulnerabilities for children trapped in limbo at the border. In a different context, **in the Canary Islands where more than 5000 children are placed**, reception centers initially established as an “emergency response” since 2020 have remained in place. Five centers were closed between 2024

and 2025 by the Specialised Child Rights Prosecutor¹ and testimonies highlight potential abuses by workers of the private contractors managing these facilities. Also, concerns regarding the limited public oversight and inadequate living conditions or legal support have been raised.

The rapid pace of legislative changes in **Finland, Italy, and Greece** has further complicated legal processes, making it difficult for asylum seekers and legal representatives to keep up with evolving policies. The EU Pact on Migration and Asylum will introduce new child-specific safeguards, including multidisciplinary age and vulnerability assessments and the appointment of physical legal guardians. At the same time, its implementation remains fragmented, with some countries, such as **Spain, Greece, and Italy**, likely to selectively apply its provisions, while **Poland** actively resists integration.



1 The Guardian. (2025, May 20). [Gran Canaria centre for unaccompanied migrant children closed after abuse allegations.](#)

IDENTIFICATION AND AGE ASSESSMENT

Age assessment processes for undocumented children in **Spain, Greece, Italy, Finland, and Poland** are marked by significant inconsistencies, racial biases, and procedural flaws. **Child identification methodologies at the border** vary widely, often relying on subjective or inappropriate practices, such as initial visual assessments by police in some islands of the **Canary Islands where no child protection actor is present**. In Spain, migrant age assessments are categorised as **'doubtful' cases**, where there is uncertainty about whether the individual is a child, and **'undoubtful' cases**, where it is evident, beyond doubt, that the person is underage. The initial identifications of children often happen **without trained practitioners being present** and thus lead to subsequent 'doubtful' or sometimes even re-assessment of 'undoubtful' children (as for instance the specific case with **Tenerife Island**). **Expedited screenings** at the border **often result in errors**, such as defaulting birthdates to January 1st, which shortens children's protection periods. Additionally, **flawed record-keeping** and a **lack of consistent oversight** create further challenges for subsequent age assessments.

Research reveals the overreliance on the **medical age assessments**, which are widely criticised for being unreliable for racialised children on the move. In the countries covered **there are limited considerations for their legal appropriateness, margin of error** and ethical implications.

Misclassification of children as adults is a recurring issue, leaving children without protections. For instance, in Greece, a Syrian boy who was interviewed was mistakenly registered as an adult and placed in a Reception and Identification Center alongside adults for nine days, rather than in an area designated for unaccompanied children, illustrating the severe consequences of **procedural errors**. In certain cases (i.e. Canary Islands), this type of error has led to a child being tried by the criminal court for adults, and not by juvenile courts. In Greece, the **IPPOKRATIS** project is involved in these assessments, but delays persist due to the **shortage of medical professionals and interpreters**. Moreover, in Lesbos, Greece, misclassified children are often left unregistered or denied psychosocial assessments required by law. In **Poland**, misclassification of children as adults leads to unlawful detention, often stemming from incomplete or poorly substantiated medical age assessments. These assessments are heavily relied upon,



yet they are often conducted by ill-equipped professionals and in a haphazard manner.

In addition, multi-disciplinary approaches that incorporate the child's testimony or evidence from psychosocial practitioners are rarely considered. Across all countries, **resource shortages and understaffing** compound these issues, highlighting the urgent need for transparent, harmonised and multidisciplinary approaches to ensure fair and effective age assessments that protect children's rights.

KEY TAKEAWAYS:

1. OVER RELIANCE ON VISUAL ASSESSMENTS:

- **Spain & Poland:** Heavy reliance on quick visual assessments by border police, leading to frequent misclassification of children as adults.
- **Greece & Italy:** Legal frameworks exist but are inconsistently applied; some assessments still rely on physical traits (e.g., facial hair, teeth).
- **Finland:** More structured process, but selection for age assessments can be arbitrary and unclear even to children.

2. REJECTION OF OFFICIAL DOCUMENTS:

- **Spain & Poland:** Passports from certain countries are often dismissed, and arbitrary birthdates (e.g., January 1st) are assigned.
- **Greece & Italy:** Official documents are not always accepted, making it harder for children to prove their real age.
- **Finland:** More likely to accept documents, but age assessments remain part of the asylum decision, making appeals difficult.

3. UNRELIABLE AND INVASIVE MEDICAL AGE ASSESSMENTS:

- **Spain, Greece² & Italy:** X-rays and bone density tests used despite scientific inaccuracies and ethical concerns.
- **Poland:** Relies on basic dental exams with no clear methodology, making appeals nearly impossible.
- **Finland and Italy:** Medical exams (teeth & bone checks) are less frequent, moving towards more comprehensive methodologies.

4. WEAK PROCEDURAL SAFEGUARDS:

- **Spain & Poland:** No clear legal mechanisms to challenge incorrect age assessments; authorities have broad discretion.
- **Greece & Italy:** Better legal safeguards, but children often lack proper information or legal representation.
- **Finland:** Age assessments cannot be appealed separately, as they are part of asylum decisions.

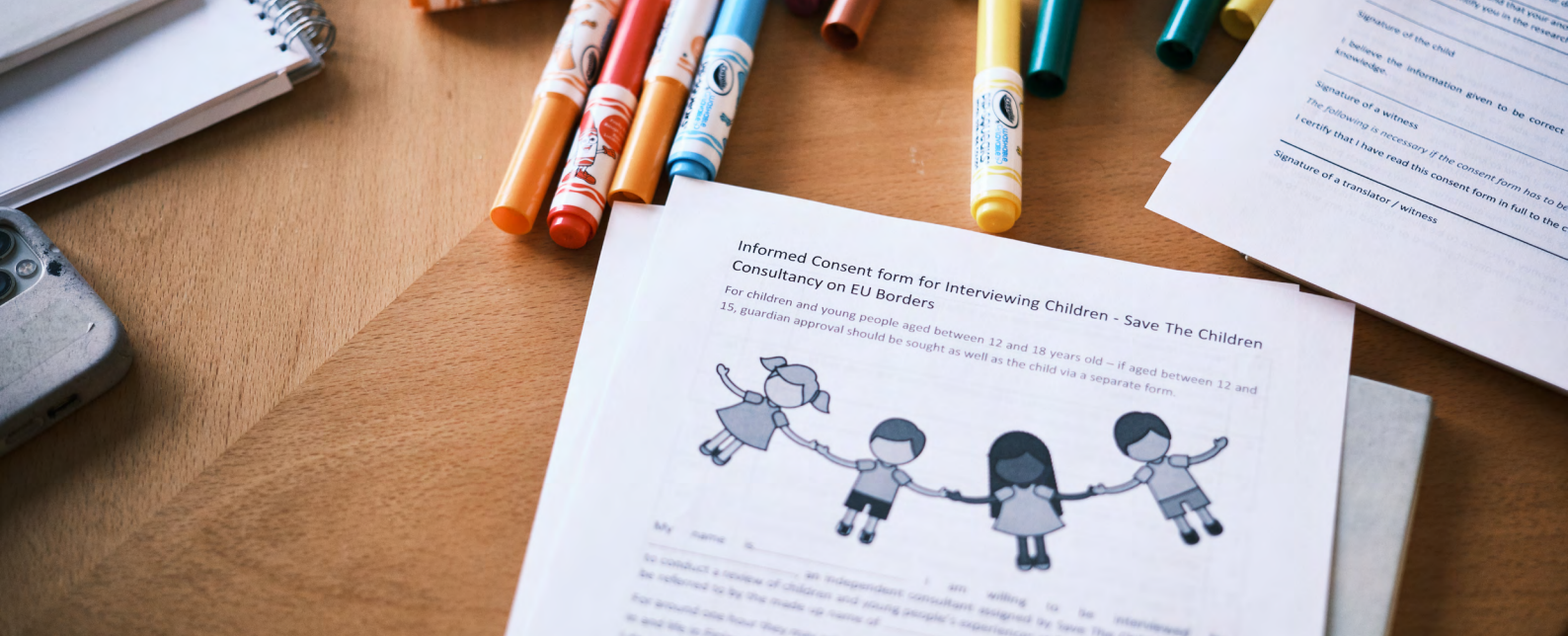
5. DELAYS IN AGE ASSESSMENTS & CHILD PROTECTION:

- **Greece, Spain & Italy:** Long delays in assessments leave children in legal limbo, affecting asylum claims and shelter placements.
- **Poland:** No formal process means children may remain undocumented or misclassified for long periods.
- **Finland:** Delays were previously up to six months, though some improvements have been made.

6. HOUSING IN ADULT FACILITIES & EXPOSURE TO HARM:

- **Spain & Poland:** Misidentified children are often placed in adult facilities, increasing risks of violence, exploitation, and abuse.
- **Greece & Italy:** Legal frameworks for child-specific shelters exist, but overcrowding and misidentification still place children in adult settings.
- **Finland:** Generally better at placing children in appropriate shelters, but inconsistencies in border vulnerability assessments remain.

2 In Greece, usually as last resort, as prescribed by law.



VULNERABILITIES AND PROTECTION NEEDS ASSESSMENT

Migrant children present diverse vulnerabilities that require careful assessment and tailored support, yet country-specific practices often fail to meet these needs. Across all five countries, vulnerability assessments are inconsistent, delayed, or entirely absent, leaving many children unprotected. Mental health, trafficking risks, and child-specific needs are frequently overlooked, especially at border entry points where early identification is critical. Urgent reforms are needed to standardise child-focused assessments, improve cross-agency coordination, and ensure timely identification of at-risk children.

In Greece, unaccompanied children benefit from more structured assessments, including **Best Interest Assessments (BIA)**. However, this program faces staffing shortages and procedural bottlenecks, while vulnerability screenings for accompanied children remain superficial, often neglecting their individual needs. In Lesvos and Kos, Greece, children frequently miss out on thorough assessments, with many vulnerabilities, such as **trafficking or abuse, going undetected** due to **limited resources and rushed procedures**.

In Italy, while initial evaluations by trained professionals aim to identify trauma, exploitation, or health issues, **resource shortages and high caseloads** hinder comprehensive care. Similarly, in Finland, border practices lack transparency,

with concerns that some children are misclassified as adults or denied access to claiming asylum. Many children rely on **support from accommodation centre staff and teachers** rather than guardians, whose roles appear limited. In Spain's Canary Islands, the rushed screening process with no presence of child protection actors often focuses on basic health checks and documentation, with minimal attention to psychosocial or trauma-related needs, leaving many children at risk of misclassification and inadequate care. In Poland, **vulnerability assessments are inconsistent**, with border guards relying on subjective evaluations. Access to healthcare or psychosocial support is often absent, and children face further challenges due to a **lack of trained specialists in reception facilities**.

Amidst these problematic practices, **Greece's National Emergency Response Mechanism (NERM)**³ stands out as a promising practice. By ensuring swift support for identified children and fostering collaboration between government bodies, NGOs, and international organisations, NERM has improved child protection coordination—offering a rare example of proactive and structured emergency response in an otherwise increasingly hostile migration landscape.

3 National Emergency Response Mechanism (NERM) provides essential support for identified children, and acts as a coordinating body, facilitating collaboration among various stakeholders involved in child protection in Greece. See p 61. of the main report for further elaboration on this promising practice.

KEY TAKEAWAYS

1. INCONSISTENT AND INSUFFICIENT ASSESSMENTS

- **Spain & Poland:** Both lack formal vulnerability assessment frameworks, leaving many children without safeguards. Spain's Asylum Act recognises vulnerable groups but does not ensure early identification. In Poland, assessments are mostly absent.
- **Greece & Italy:** Vulnerability screenings are integrated into asylum procedures, but delays and inconsistencies undermine their effectiveness. Greece's Ippokratitis Programme is expanding but remains insufficient.
- **Finland:** Vulnerability assessments are also integrated into asylum procedures, even though there is a lack of systematic procedures for this. Also, with the eastern border being closed, the process at the border remains unclear, with concerns that children may be turned away based on visual assessments.

2. MENTAL HEALTH AND TRAUMA OVERLOOKED

- **Greece, Poland & Spain:** Despite high levels of trauma among migrant children, mental health services are minimal. Language barriers and limited access to psychologists further restrict support.
- **Italy:** Psychological screening exists but is often delayed, particularly for accompanied children.
- **Finland:** No clear evidence of mental health being considered systematically in vulnerability assessments.

3. HUMAN TRAFFICKING RISKS NOT ADEQUATELY ADDRESSED

- **Poland:** Minors suspected of trafficking are sometimes misclassified as adults and placed in closed facilities, increasing their vulnerability.
- **Spain & Italy:** Identification mechanisms at disembarkation points are weak, with screenings often focused on detecting smugglers rather than trafficking victims.

4. LACK OF CHILD-SPECIFIC ASSESSMENTS

- **Greece & Italy:** Accompanied children are typically assessed as part of family units, meaning individual risks may be overlooked. Separate child interviews are rare.
- **Poland & Finland:** No standardised protocol ensures that children are interviewed separately from family members.

5. BUREAUCRATIC DELAYS AND POOR COORDINATION

- **Greece :** Screening backlogs mean asylum claims are processed before thorough vulnerability assessments are completed.
- **Poland:** Lack of agency coordination results in trafficking victims disappearing without follow-up.
- **Italy:** Some progress in referral systems, but implementation remains uneven.
- **Spain:** No national referral system is in place, leading to saturation and overcrowding in the minors protection system at entry points.

GUARDIANSHIP AND LEGAL REPRESENTATION



Guardianship systems for unaccompanied children across the EU face significant challenges due to **resource constraints, insufficient training, and overwhelming caseloads**. This report underscores the urgent need for every unaccompanied child to have access to a trained, **dedicated guardian and effective legal representation**. Guardians play a crucial role in advocating for children's best interests, particularly in sensitive procedures where errors can lead to children being **misclassified as adults and denied essential protections**.

In Greece, particularly on the islands and during periods of increased migration (a situation that has persisted since at least 2023), a significant number of unaccompanied children find themselves without guardians, leaving them in inadequate conditions and unable to move forward in their asylum cases. In Poland, guardianship is often assigned to overburdened lawyers with limited expertise, while in the Canary Islands, the Directorate for Children under the Canarian Government of Social Welfare acts as the legal guardian for all children who lack parental care, but lacks migration-specific knowledge. Spain does not have a physical guardian function at all, further exacerbating the gap in child protection. Despite this, the figure of guardian exists, acknowledging that professionals at reception centers bear

certain responsibilities for the children's wellbeing under their care. Delays in guardianship put children at risk during crucial processes, such as age assessments and residence permit applications, leaving them unprepared to navigate complex legal procedures without proper guidance.

Issues with guardianship – including an insufficient number of appointed guardians, also impact separated children, who face additional risks when placed with relatives before a guardian can assess whether the relationship and environment are truly safe and appropriate, as seen in cases from Greece. The Pact on Migration and Asylum introduces the possibility of guardians overseeing **up to 30 children at a time, raising concerns about capacity and quality**. However, in countries like Spain, where no guardian function currently exists, effective guardianship should be promptly implemented. The effectiveness of guardianship will largely depend on qualification standards, training, and proper assignment, with the EUAA and NGOs potentially playing a key role in capacity-building efforts.

KEY TAKEAWAYS

1. DELAYS AND GAPS IN GUARDIANSHIP ASSIGNMENT

- **Spain & Greece:** Bureaucratic delays mean children may wait months for guardianship. Spain requires a declaration of abandonment (up to three months), while Greece's new system (2022) is still incomplete, leaving gaps at border areas.
- **Italy:** Volunteer-based system suffers from shortages, causing long waits and regional inconsistencies.
- **Poland:** Faster process, but no training or selection criteria, leading to ineffective support.
- **Finland:** Guardians assigned in 1-2 weeks, but their role is largely symbolic—children rely more on accommodation staff.

2. LACK OF QUALIFIED AND INDIVIDUALISED GUARDIANSHIP

- **Spain & Poland:** No individual guardians—Spain relies on institutionalised child protection services; Poland assigns random, untrained lawyers (kurators).
- **Italy:** Individual guardians lack training, limiting quality of care.
- **Finland:** No specialised child protection requirements for guardians.

3. ABSENCE OF GUARDIANS DURING KEY PROCEDURES

- **Greece, Spain & Poland:** Children often face delays in age assessments, asylum interviews, and legal processes due to this absence, leading to misclassification and rights violations.
- **Italy & Finland:** Guardians present for asylum interviews, but effectiveness varies—Italy has regional inconsistencies, Finland's guardianship is largely procedural.

4. OVERBURDENED GUARDIANS AND HIGH CASELOADS

- **Spain & Greece:** Spain does not have a pool of trained guardians, i.e just the Canary Islands alone would need at least 160 individual guardians for more than 5000 children; Greece's target of 180 guardians remains unmet.
- **Italy & Finland:** Italy's system lacks trained volunteers; Finland has no cap on cases per guardian.
- **Poland:** Lawyers as guardians handle excessive caseloads, with some seeing a child's disappearance as a relief.

5. SYSTEMIC BARRIERS: LANGUAGE, BUREAUCRACY, AND STRUCTURAL WEAKNESSES

- **Greece & Poland:** Lack of interpretation services hinders communication between children and guardians.
- **Spain & Italy:** Slow bureaucracy leaves children in legal limbo, while Italy has regional disparities in access to guardianship.
- **Finland:** Quick appointment but no training standards, limiting guardians' effectiveness.

ASYLUM PROCEDURES, ACCESS TO PROTECTION AND RECEPTION CONDITIONS

Migrant children at EU borders face significant obstacles in accessing asylum and appropriate care, with pushbacks, prolonged procedures, and arbitrary detention exacerbating their vulnerability in all countries explored in this research.

Compounding these challenges, many countries continue to detain children in unsuitable facilities instead of providing child-appropriate reception conditions. In **Greece**, unaccompanied children are often placed in 'safe areas' within closed, controlled access centres, where they face de facto detention, sometimes for prolonged periods. However, despite being labelled as "safe," they often do not offer a truly protective environment. Meanwhile, **Finland** demonstrates a more protective approach towards asylum seeking children, with unaccompanied children swiftly transferred to separate shelters specifically for unaccompanied children, offering better care, whilst detention is still foreseen for children in return procedures.

Nonetheless, across Europe, the absence of standardised, age-appropriate reception systems remains a major concern. This report underscores the urgent need for alternatives to detention, such as community-based care, to ensure the safety and well-being of migrant children and calls for a shift towards child-centered asylum policies that guarantee timely legal representation and tailored protection measures.



KEY TAKEAWAYS ON RECEPTION AFTER BORDER CROSSING

1. LEGAL PROTECTIONS VS. REALITY:

While international and EU law prohibit child detention for immigration purposes, restrictive national policies persist. **Spain, Greece, Poland, Finland and Italy** continue to de facto detain children under certain conditions.

2. DETENTION PRACTICES AND ARBITRARY CONFINEMENT:

- **Spain & Greece:** *Children face de facto detention. Spain's CATEs hold children under restrictive conditions, while Greece enforces movement restrictions in CCACs and RICs.*
- **Poland:** *Misclassified children may be placed in closed facilities, with "preventative detention" used against trafficking but often in violation of children's rights.*
- **Italy:** *Identification at borders often results in de facto detention*
- **Finland:** *Unaccompanied children are rarely detained, but proposed laws could expand detention.*

3. RECEPTION CONDITIONS: QUALITY AND OVERSIGHT CHALLENGES:

- **Spain:** *Overcrowded Canary Island minor protection systems present insufficient child protection standards, with some closing due to poor conditions.*
- **Greece:** *Overcrowding in CCACs and RICs, combined with a lack of basic necessities, essential services, and child-friendly spaces, has created an oppressive environment, forcing asylum seeking children, including UAC, to endure unsafe and undignified living conditions.*
- **Italy:** *First reception centers exist but suffer from overcrowding and slow transfers, limiting access to education and psychological care.*
- **Poland:** *Unaccompanied children are placed in ill-equipped orphanages or improvised facilities.*
- **Finland:** *Generally positive conditions, but rising private sector involvement raises concerns over quality.*

4. FAMILY SEPARATION AND ITS IMPACT:

- **Finland:** *Detention policies have led to fathers being separated from families.*
- **Poland & Italy:** *Lack of dedicated facilities in Poland results in poor tracking, while Italy prioritises family unity but struggles with emergency placements.*

5. INCONSISTENT CHILD SAFEGUARDS & LEGAL SUPPORT IN SEMI-CLOSED RECEPTION SYSTEMS:

- *In all countries, semi-closed reception settings as well as legal and procedural gaps leave children without assistance in asylum interviews, age assessments, and deportation proceedings.*
- *In these centres, there is a shortage of child psychologists, interpreters and cultural mediators, which further limit children's access to essential services.*

OVERSIGHT AND MONITORING

Civil society organisations play a crucial role in advocating for the rights of migrant children, but often face challenges in a **hostile political climate**. The report calls for greater collaboration between civil society and governments to ensure that children's rights are fully respected and prioritised in migration policies.



KEY TAKEAWAYS

1. HOSTILE POLITICAL ENVIRONMENT & CRIMINALISATION OF SOLIDARITY

- NGOs in **Greece, Italy, and Poland** face threats, surveillance, and criminalisation, especially at border zones.
- In **Italy**, humanitarian workers involved in sea disembarkations and monitoring are prosecuted for “facilitating irregular migration.”
- **Poland** promotes a “two-tier” asylum narrative, favouring Ukrainian refugees and undermining universal child rights advocacy.

2. LEGAL & OPERATIONAL RESTRICTIONS

- **Greece's 2020 NGO law** imposes vague, discretionary criteria that restrict access to migrant facilities.
- Even, when the access is granted, quality of the legal aid is not guaranteed. In the **Canary Islands**, lawyer-client confidentiality has been compromised.
- Children receive poorer legal aid in **Spain and Greece**.

3. WEAK OVERSIGHT & MONITORING MECHANISMS

- Screening Regulation foresees **Independent Monitoring Mechanism (IMM)**, where civil society along the other human rights actors, such as **National Human Rights Institutions (NHRIs)** and Ombudsman would play a role in monitoring pre-screening procedures at the EU borders.
- **Croatia's IMM** lacks power and independence; no unannounced visits or direct access to victims.
- **Greece's NTA and Fundamental Rights Officer** have not ensured accountability or public reporting.

- In **Spain**, Child Rights Ombudsman, so far, has not played their role in the ‘independent’ monitoring of the children arriving at the EUs borders.
- **Bosnia and Herzegovina** sees continued violent pushbacks at the Croatian border, with no prosecution despite multiple legal complaints.

4. GAPS IN COLLABORATION IN MONITORING AND ADVOCACY

- Collaboration between CSOs, ombudspersons, and international actors remains fragmented and overly dependent on informal networks. Some child rights Ombudsmen showed a lack of willingness to be part of IMM, for instance, in **Spain and Croatia**.
- Cooperation with the border and police authorities in a hostile environment becomes even more difficult. However, interviews indicate how personal and local ties between civil society and statutory actors are **needed and possible**, given that **distinct mandates are respected**.



ADDRESSING THE CURRENT SITUATION OF CHILDREN AT EU EXTERNAL BORDERS: RECOMMENDATIONS FOR ACTION

1. AGE AND VULNERABILITY ASSESSMENTS

- Implement standardised, multidisciplinary age and vulnerability assessments across the EU, following the EUAA's Practical Guidance on Age Assessment.
- Ensure visual assessment is avoided completely and that child protection actors are present during the screening.
- Implement multi-disciplinary age assessment only when necessary, which should include a psychosocial assessment performed by qualified professionals.
- Medical examinations should be avoided. Complete and reliable documentation should be made available and any doubts on self declared ages should be considered only when reasonable.
- Treat the presumed child as a child in all respects while awaiting the outcome of the procedure. If there is still a lack of clarity, the presumption of minority should always be guaranteed.
- Develop and mandate the use of standardised, child-sensitive vulnerability assessment protocols at all EU external borders. These must be accompanied by compulsory, rights-based and gender-based training for border and migration officials, interpreters, and any personnel involved in the screening process. Child protection actors must also always be involved in these processes.
- Guarantee the meaningful participation of children in vulnerability assessments, supported by qualified child protection professionals, legal guardians, and interpreters trained in communicating with children.

2. GUARDIANSHIP SYSTEMS

- Ensure every unaccompanied child is assigned a well-trained, independent guardian from their arrival and ahead of any identification and registration procedures, with oversight from the EUAA to standardise practices across Member States.
- The maximum number of children assigned per guardian should ensure the effectiveness of guardianship in the protection and representation of children's rights and Member States should ensure their independence.
- National child rights ombudspersons should monitor guardianship systems to ensure the best interests of the child are upheld.

3. RECEPTION CONDITIONS AND CHILD-FRIENDLY SPACES

- Detention of children must always be avoided, as it is never in the best interest of the child. Alternatives to detention must be developed for all children.
- Avoid holding children, especially unaccompanied minors, in substandard or emergency border facilities, and swiftly transfer them to child-appropriate, durable reception centers that ensure adequate care, protection, and integration support.
- Avoid retreating to emergency containment and prioritise the development of foster care and small-scale, community-integrated care centers staffed with trained child protection professionals, including cultural mediators, psychologists, and educators.
- Standardise reception conditions at borders and regularly evaluate facilities in border areas, ensuring access to legal, psychosocial, and interpretation services, complaint mechanisms and quality control mechanisms.
- Organise child friendly spaces and safe areas for children at border areas.
- Prioritise humanitarian organisations to manage care facilities, as they possess the knowledge and experience to ensure child-centered care. Standardise conditions that must be met in all facilities.
- Ensure child-safeguarding policies and protocols are in place and applied in all facilities.
- Ensure contingency planning to avoid overcrowding and the lowering of protection standards during emergencies.

4. INFORMATION AND LEGAL SUPPORT

- Ensure that all children arriving at EU external borders receive timely, age-appropriate, and culturally sensitive information about their rights, procedures, and options.
- Ensure timely access to free, independent legal assistance and representation during screening and asylum procedures.
- Expand access to free legal aid for all children, with EU funding to support national legal assistance programs.

5. BORDER MONITORING AND ADVOCACY

- Establish independent, child rights-focused monitoring bodies with a mandate to oversee practices at borders and ensure compliance with EU and international protection standards.
- Guarantee accountability for the violations assessed and address the needed improvements identified by monitoring entities.
- Protect advocacy spaces to enable NGOs to provide critical support and oversight at EU and national levels.
- National governments must prevent pushbacks and ensure compliance with international child protection standards.



*To read the full report,
please scan this QR code.*