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Reflection points and resources prepared for the European Guardianship Network on provisions specifically addressing unaccompanied children in a recast of the EU Return instrument, with a particular focus on guardianship, October 2025

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This Paper arises out of an analysis and discussion of the Commission [proposal](#) for a Return Regulation (hereafter “the Proposal”) within the European Guardianship Network (“EGN”). There are several general provisions in the Proposal which apply to all persons falling within its scope, including unaccompanied children. This Paper does not aim to consider all these provisions. Instead, it focuses on the *Proposal’s specific provisions on unaccompanied children*. In particular, EGN discussions considered the provisions of *guardianship*. They also concerned the application of the *best interests principle, potential countries of return, transnational cooperation between EU States, age assessment, legal assistance and appropriate reception conditions*.

The Paper is being published to share important reflection points and resources for EGN members and other stakeholders when considering these issues. It does not define the positions of individual EGN Members.

Overview of Key Reflection Points

- The Proposal requires very significant amendments to provide both legal certainty and procedural safeguards sufficient to ensure respect for the Charter of Fundamental Rights and the UN Convention on the Rights of the Child.
- Unaccompanied children may be in particularly vulnerable situations when they fall within the scope of the Return Proposal.
- **Guardianship** is a key cornerstone in the protection of unaccompanied children and in ensuring that the State can properly engage with children. Guardians should support and assist the child through important procedures. They can assist children to participate, help them trace family and contribute relevant information about their situation, as well as contribute their views, during procedures to establish durable solutions. Guardians can play a vital role in ensuring both their best interests are a primary consideration in decision-making and that the proper measures are in place to ensure safe and secure outcomes for children, when implementing these solutions.
- The Proposal states its aim of improving guardianship for unaccompanied children but it makes scant provision to do so. For guardianship to be effective, provisions must be in place to ensure the appointment of qualified, independent and trained guardians, supported by a guardianship system which ensures adequate support and supervision. This has been recognised in the CEAS reform. Guardianship under the return system should build on the same guardianship system being put in place under the CEAS Reform.
- Essential elements of **best interests procedures** during return procedures must be also established under EU law, to ensure any return decisions (and their implementation) comply with the Charter of Fundamental Rights.
- There should be **no possibility** of sending unaccompanied children to **countries with which they have no substantial connection, and where it is not in their best interests to do so**.
- Any cooperation between EU Member States in relation to unaccompanied children needs to involve **cooperation between guardians in different countries concerned**, with the aim of ensuring that the best interests of the child informs all decisions in their regard, at all stages. As noted in the EC Recommendation on developing and strengthening integrated child protection systems in the best interests of the child,

“Member States should enhance cooperation in child-protection cases with cross-border implications, includingby facilitating and strengthening transnational cooperation between the actors supporting children.”

- Access to procedural safeguards will rely on **appropriate age assessment procedures**, where there are substantiated doubts about the age of a child. It is vital to ensure that EU law ensures that age assessment procedures are carried out by Member States in a way that respects the rights of the child, and improvements made by the Asylum Procedures Regulation should be the starting point in this regard. To apply properly, this must include the possibility to appeal an age assessment decision, with suspensive effect on any return decision in the interim.
- During procedures under the proposal, appropriate reception conditions should be in place for unaccompanied children, with obligations to **undertake individual assessments** of their needs. Detention of unaccompanied children should be prohibited. Provisions aimed at **tracing family and restoring family links**, where this is in their best interests and with the support of guardians, should be included.
- The Return Recast should provide that an unaccompanied minor has a right **to legal counselling, assistance and representation** alongside guardianship from the outset of the decision-making process.

As it stands, the Proposal is unlikely to succeed in contributing European migration management. It will fail to create a common system and will simply generate considerable divergences between Member States. Member States will face considerable legal uncertainties in applying EU law. National courts will face important questions of law, as may the European Court of Justice. Authorities and children will risk being involved in protracted and difficult procedures. Inadequate safeguards for unaccompanied children will violate their rights. The Proposal has the potential to undermine the safety and wellbeing of unaccompanied children and in fact heighten the risk they face, whilst being ineffective in securing successful decision-making.

In contrast, any new EU measures should put in place the proper safeguards and procedures and ensure that the State engages in a lawful way with unaccompanied children. Such a process could create real opportunities to establish comprehensive and sustainable solutions for them, in line with the UN Convention on the Rights of the Child. There is value in working together in Europe towards proper migration management, including finding durable solutions for unaccompanied children. In individual circumstances this might include return where it is in the best interest of the child, and when they are properly supported and assisted by guardians and legal assistance providers. This paper points to ways in which this might be reflected in EU law.

1. About this paper

In light of the Commission [proposal](#) for a Return Regulation (hereafter “the proposal”), and drawing on the European Guardianship Network (“EGN”) Standards on Guardianship, this reflection paper provides EGN Members and other stakeholders with reflection points on return procedures relating to unaccompanied children and guardianship. It focuses in particular on how guardianship should be put in place, as well as the procedures which should be in place to ensure the child’s best interests are a primary consideration in all actions in their regard.

2. Introduction to the EGN

The European Guardianship Network (EGN) brings together member organisations providing guardianship to unaccompanied children across the EU, alongside national authorities responsible for guardianship, and EU agencies and regional organisations involved in strengthening guardianship. For more information, see www.egnetwork.eu. The EGN’s work is guided by our seven standards on guardianship:

1. **Non-discrimination:** Children benefit from equal guardianship services within the state’s territory, irrespective of the place of residence, their age or their immigration status
2. **Responsibility & Accountability:** Children can depend on guardianship systems which have a clear basis, a responsible authority and monitoring and accountability mechanisms in place
3. **Independence & Impartiality:** Children can depend on their guardian being independent and impartial when taking decisions in their best interests
4. **Child-centred Approach:** Children’s rights are respected, protected and fulfilled
5. **Child Participation:** The child’s right to be heard is respected, by informing them in a manner they understand about the scope of guardianship arrangements and available services and support, by enabling them to speak out, complain and influence, and by giving due weight to their viewpoint
6. **Quality:** Children are supported and assisted by qualified, continuously trained and well supported guardians who have sufficient time to respond effectively to their needs
7. **Collaboration and Sustainability:** Children can depend on guardianship systems being an integral part of the national child protection system, being allocated sufficient human and financial resources, being effectively monitored and acting as a link between the child and other agencies or individuals who are responsible for taking action in their regard

3. A preliminary word on terminology

Throughout this note, the EGN uses the general term “guardian” to correspond with the term “representative” (under the Reception Conditions Directive, the Asylum and Migration Management Regulation, the Asylum Procedures Regulation, Screening Regulation and Eurodac Regulation) and guardian (under the Qualifications Regulation and the EU Anti - Trafficking Directive). This follows the use of the term in the Communication on the protection of children in migration, the FRA Handbook on Guardianship for children deprived of parental care and the UN Committee on the Rights of the Child General Comment No 6.

4. Guardianship – high ambition stated, but sparse and ineffective provisions in the proposal

In particular on guardianship, the proposal aims to “*harmonises the rules to provide, on request, free legal assistance and/or representation, in line with the newly adopted Pact rules. Finally, the proposal aligns with the rules in the asylum acquis on age assessment of minors, as well as on appointing a representative to accompany unaccompanied minors in the return process. By providing a link with the asylum process, the proposal ensures appropriate and coherent treatment of minors across the Union’s migration management rules, bringing clarity, simplification and predictability*”.¹

We welcome this goal, which is necessary to comply with fundamental rights obligations to these children. The proposal should build on the guardianship system being put in place and strengthened in EU law on international protection. However, the proposal fails to do so and in fact contains insufficient provisions on guardianship:

A representative or a person trained to safeguard the best interest of the child shall be appointed to represent, assist and act, as applicable, on behalf of an unaccompanied minor in the return process. It shall be ensured that the appointed representative is appropriately trained in child-friendly and age-appropriate communication and that they speak a language that the minor understands.

Notably, the proposal fails to include provisions on the definition and role of the guardian. Nor does it include any of the provisions on managing guardianship which are essential to ensuring quality and effective guardianship. Far from benefiting from the harmonization that took place in the CEAS reform (set out in section 6 below), the proposal generates great uncertainty for national guardianship systems and fails to provide any guarantee of adequate support and assistance to unaccompanied children. Indeed, there is a possibility, under the current language², to have different and potentially weaker guardianship for the unaccompanied children who have not been through international protection procedures. This is not justified by any differences in the needs and rights of these children. Indeed, it would be very inefficient to have two systems of guardianship, depending on the procedural path which the child has followed, although their needs and rights to information, support and assistance are the same.

Instead, the ongoing recast should be used to build on the consensus under the CEAS reform to develop strong and resilient guardianship, which plays a considerable role in ensuring successful outcomes for children. Guardians are important to both the State and children. They help ensure that the State properly engages with children. They help inform and support the child, guide them in understanding the processes (such as age assessment) and help them access legal counselling and assistance. They can assist the child as regards relevant information for best interests procedures. They can play a critical role in ensuring the safety and wellbeing of unaccompanied children who can be at severe risk. Guardians should be an important part of the integrated child protection system, which brings together authorities, services and actors who are responsible for

¹ Explanatory Memorandum to the Return Regulation [Proposal](#), see section on Other Elements

² The proposal also notes: That *person shall be the person designated to act as a representative under Directive (EU) 2024/1346 where the person has been designated in accordance with Article 27 of that Directive.*

protecting children from abuse, exploitation, neglect and violence. (See Annex 1 for our further reflection points and resources on this.)

5. Best interests procedures: overview of essential provisions

- a. The proposal provides that “The best interests of the child shall be a primary consideration for Member States with respect to all procedures.” (Article 18). [Guidance](#) to respect children’s rights on return policies and practice can be consulted here. A more complete provision on the application of this principle should be included, as occurred in the CEAS.

For inspiration, see Article 23, AMMR

1. The best interests of the child shall be a primary consideration for Member States with respect to all procedures provided for in this Regulation. Procedures including minors shall be treated with priority.

..

4. In assessing the best interests of the child, Member States shall closely cooperate with each other and shall, in particular, take due account of the following factors:

- (a) family reunification possibilities;*
- (b) the minor’s well-being and social development in the short, medium and long term, including situations of additional vulnerabilities such as trauma, specific health needs or disability, taking into particular consideration the minor’s ethnic, religious, cultural and linguistic background, and having regard to the need for stability and continuity in the social and educational care;*
- (c) safety and security considerations, in particular where there is a risk of the minor being a victim of any form of violence or exploitation, including trafficking in human beings;*
- (d) the views of the minor, in accordance with his or her age and maturity;*
- (e) where the applicant is an unaccompanied minor, the information provided by the representative in the Member State where the unaccompanied minor is present;*
- (f) any other reasons relevant to the assessment of the best interests of the child*

- b. A return decision shall be issued to an unaccompanied minor only following a best interests procedure which considers the individual circumstances of the child’s situation and their best interests.

A best interests procedure should ensure a comprehensive assessment of the situation of the child. It should involve a general and in-depth assessment of the child’s situation. It should include assessment re trafficking risk (risk that child has been trafficked or is at risk of trafficking on return). See point 46 of the [TQ](#) judgment of the ECJ: As was noted by the Advocate General in point 69 of his Opinion, only by carrying out a general and in-depth assessment of the situation of the unaccompanied minor in question is it possible to determine the ‘best interests of the child’ and to issue a decision which complies with the requirements under Directive 2008/115.

- c. The assessment should be informed by information gathering, including in the host State and the State of origin and by referring to child specific country of origin information. HCCH 1996 Child Protection, and relevant bilateral instruments on child protection, can be used for exchange of information on parental responsibility and child protection.
- d. Return can be considered only in relation a country of origin or country with which a child has substantial connection and has access to, such as a family member, sibling or relative is legally present and in which the child may legally reside.
- e. Unaccompanied minors should not be sent to return hubs. FRA is quite clear on this: *For unaccompanied children, it is virtually impossible to imagine situations where the transfer to a return hub could be in the child's best interests.*³
- f. State shall examine whether return to a family member, an adult sibling or a relative in the country of origin is in their best interests of the child.

- To consider whether recitals to the recast could indicate circumstances that need to be considered carefully in relation to family reunification, such as length of time since child has been with the family, ability of family to take care of child, etc

- g. If the Member State finds that there is no family member, adult sibling or relative in the country of origin, the Member State shall investigate whether there are sustainable and appropriate care and custodial arrangements that can be put in place for the child. (include recitals with guiding considerations for this question)

For inspiration

On the terminology on potential arrangements other than unification with family members, siblings or relatives see Article 8 (6) Qualification Regulation which talks about "Where the applicant is an unaccompanied minor, the determining authority shall take into account the best interests of the minor and, in particular, the availability of sustainable and appropriate care and custodial arrangements"

- h. The child will be heard before any decision is taken.
- i. Any decision to return the child should specify the measures necessary to implementation of return. This should indicate the individual guarantees on proper care and custodial arrangements being in place, including through detailed and reliable information on the specific arrangements in place to which a minor will return. The return decision should state to whom care and custodial responsibilities are being transferred,
- j. Provision for the grant of a residence permit in the host country to ensure continuity and stability for the minor, if return is not in their best interests or possible. There should be a provision in place for an unaccompanied minor if a return decision cannot be issued and/or return is not in the best interests of the child. The current article 6 in the Return Directive

³ FRA. (2025). Planned return hubs in third countries – EU fundamental rights law issues.

leaves it to the discretionary of the EU MS to act on these situations. However, given recent caselaw of the CJEU in particular in *TQ*, we learn that the CJEU is quite clear that unaccompanied minors may not end up in a situation of unclarity.

- k. Return decisions must be fully reasoned in accordance with article 296, second paragraph, TFEU. See also above Article 23 AMMR.
- The return decision must consist of several elements. Inter alia it must mention to which country a person has to return to in light of Article 13 of the Return Directive and Article 47 of the CFR.⁴ The authorities must include reasoning on two central elements in the return decision (i) where a return decision is taken, that this is based on having individual guarantees on proper care and custodial arrangements being in place, including through detailed and reliable information on the specific arrangements in place to which a minor will return and (ii) that such return is in the best interests assessment in relation to the child's circumstances

For inspiration: AMMR Article 23 (5)

Any decision to transfer an unaccompanied minor shall be preceded by an individual assessment of the best interests of the child. The assessment shall be based on the relevant factors listed in paragraph 4 of this Article and the conclusions of the assessment of those factors shall be clearly stated in the transfer decision. The assessment shall be done without delay by appropriately trained staff with the necessary qualifications and expertise to ensure that the best interests of the child are taken into consideration.

For inspiration, consider the judgment of the ECtHR - *Tarakhel v. Switzerland*, Application no. 29217/12. The Court found that in the absence of **detailed** and **reliable** information concerning the **specific** facility in Bologna, where the applicants were to be supposedly accommodated in, the physical reception conditions and the preservation of the family unit, the Court considers that the Swiss authorities do not possess sufficient assurances that, if returned to Italy, the applications would be taken charge of in a manner adapted to the age of the children. It follows from that, were there applicants to be returned to Italy without the Swiss authorities having first obtained **individual guarantees** from the Italian authorities that the applicants would be taken charge of in a manner adapted to the age of the children and that the family would be kept together, there would be a violation of article 3 of the Convention.

The decision will set out the reasons for the decision in language that can be understood by the child; including the outcome of the investigation into the minor's best interests in relation to the destination in the country of origin compared to regularly stay in the Member State.

- l. Any cooperation between EU Member States in relation to the enforcement of Return Orders in relation to unaccompanied children needs to involve **cooperation between guardians in different countries concerned**, with the aim of ensuring that the best interests of the child

⁴ CJEU, 14 May 2020, C-924/19, (*FMS*).

informs all decisions in their regard, at all stages. As noted in the EC Recommendation on developing and strengthening integrated child protection systems in the best interests of the child, “Member States should enhance cooperation in child-protection cases with cross-border implications, includingby facilitating and strengthening transnational cooperation between the actors supporting children.”

6. Other guarantees for unaccompanied children

Age assessment

It is vital to ensure that EU law ensures that age assessment procedures are carried out by Member States in a way that respects the rights of the child, and improvements made by the Asylum Procedures Regulation should be the starting point in this regard. For inspiration see relevant provisions in the APR, with the important caveat that the decision-making authority should include the possibility of an independent juvenile court making determination and provide a possibility immediately to appeal the decision as well as ensuring the suspensive effect of appeal. Age assessment must not be done twice (in the asylum procedure and later on in the return procedure).

Access to services:

Minors are entitled to safe accommodation and all necessary support services during their stay in a EU MS and thus also before they are issued a return decision.

For inspiration: See recital 41 of the RCD.
See also: In its Communication of 12 April 2017 ‘The protection of children in migration’, the Commission underlined that Member States must put in place appropriate safeguards to protect all children in migration present on their territory, including by the adoption of measures to ensure that children are provided with safe and appropriate accommodation as well as necessary support services to secure the child’s best interests and wellbeing, in accordance with the Member States’ obligations arising from national, Union and international law

There should be NO detention of unaccompanied children.

Legal assistance

The Return Recast should provide that an unaccompanied minor has a right to legal counselling, assistance and representation alongside guardianship from the outset of the decision-making process.

For inspiration: see article 33(1, second paragraph APR):

The first subparagraph of this paragraph shall apply without prejudice to unaccompanied minors’ right to legal counselling and to legal assistance and representation in accordance with Articles 15 and 16.

Individual assessments:

Individual assessments of the child 's situation should be undertaken to inform actions taken in their regard, and their access to specialized services and protection

For inspiration see Article 25 RCD

1. In order to effectively implement Article 24, Member States shall, as early as possible after an application for international protection is made, individually assess whether the applicant has special reception needs, using oral translation where necessary. [...]
2. For the purposes of paragraph 1, Member States shall ensure that the staff assessing special reception needs in accordance with this Article:
 - (a) are trained and continue to be trained to detect signs that an applicant has special reception needs and to address those needs when identified;

For inspiration, see also the **procedures for individual assessments contained in the Child Procedural Safeguards Directive, Article 7:**

Article 7

Right to an individual assessment

1. Member States shall ensure that the specific needs of children concerning protection, education, training and social integration are taken into account.
2. The individual assessment shall, in particular, take into account the child's personality and maturity, the child's economic, social and family background, and any specific vulnerabilities that the child may have.
3.
4. ..
5. The individual assessment shall be carried out at the earliest appropriate stage of the proceedings and, subject to paragraph 6, before indictment.
6. ..
7. Individual assessments shall be carried out with the close involvement of the child. They shall be carried out by qualified personnel, following, as far as possible, a multidisciplinary approach and involving, where appropriate, the holder of parental responsibility, or another appropriate adult as referred to in Articles 5 and 15, and/or a specialised professional.
8. ...
9.

Family reunification

- Adapt CEAS provisions to address the role of the guardian in assisting to restore contact with family members and relatives where this is in their best interests

For inspiration see various CEAS provisions on family tracing, including Article 27(10) RCD

Member States shall start tracing the members of the unaccompanied minor's family, where necessary with the assistance of international or other relevant organisations, as soon as possible after an application for international protection is made, whilst protecting the best interests of that unaccompanied minor. Where there is a possible threat to the life or integrity of the minor or the minor's close relatives, in particular if those relatives have remained in the country of origin, care must be taken to ensure that the collection, processing and circulation

of information concerning those persons is undertaken on a confidential basis, so as to avoid jeopardising their safety.

See also Article 25(6) AMMR

6. The Commission is empowered to adopt delegated acts in accordance with Article 78 concerning: (a) the identification of family members, siblings or relatives of unaccompanied minors; (b) the criteria for establishing the existence of proven family links; (c) the criteria for assessing the capacity of a relative to take care of an unaccompanied minor, including where family members, siblings or relatives of the unaccompanied minor are staying in more than one Member State. In exercising its power to adopt delegated acts, the Commission shall not exceed the scope of the best interests of the child as provided for under Article 23(4)

Article .. – definitions

What	Definition	Where to find
Unaccompanied minor	‘unaccompanied minor’ means a minor who arrives on the territory of the Member States unaccompanied by an adult responsible for him or her, whether by law or practice of the Member State concerned, and for as long as that minor is not effectively taken into the care of such an adult, including a minor who is left unaccompanied after he or she has entered the territory of the Member States	Article 2(11) AMMR
Relative	‘relative’ means the applicant’s adult aunt or uncle or grandparent, regardless of whether the applicant was born in or out of wedlock or adopted as defined under national law	Article 2(9) AMMR
Sibling	Though mentioned in AMMR, this was not defined. In light of the article on issuing a return decision it would make sense to talk about an adult sibling.	-
Family member	‘family member’ means, where the applicant is a minor and unmarried, the father, mother or another adult responsible for the applicant, whether by law or by the practice of the State where the adult is present	Article 2 (8-c) AMMR

ANNEX 1: Building a strong and resilient guardianship - additional or alternative elements required, based on the CEAS reform

Definition:

It is important that a clear definition of guardianship/representation be included and that the very general alternative “or a person trained to safeguard the best interest of the child” be deleted. For inspiration, see:

Guardian	<p>‘guardian’ means a natural person or an organisation, including a public body, designated by the competent authorities to assist, represent and act on behalf of an unaccompanied minor, as applicable, in order to ensure that the unaccompanied minor can benefit from the rights and comply with the obligations under this Regulation, while safeguarding his or her best interests and general well-being.</p> <p>Or representative</p> <p>representative’ means a natural person or an organisation, including a public authority, appointed by the competent authorities, with the necessary skills and expertise, including with regard to the treatment and specific needs of minors, to represent, assist and act on behalf of an unaccompanied minor, as applicable, in order to safeguard the best interests and general well-being of that unaccompanied minor and so that the unaccompanied minor can benefit from the rights and comply with the obligations provided for in this Directive;</p>	<p>Article 3(18) Qualification Regulation</p> <p>Article 2(13), RCD</p>
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Role of a guardian, independence and quality

Each Member State where an unaccompanied minor is present shall ensure that he or she is represented and assisted by a representative with respect to the relevant procedures. Provision

should be made concerning the appointment process and deadlines. Explicit provisions should be in place concerning the role of the guardian, their independence, training and resources, as has been done in the CEAS provisions.

For inspiration: Article 23 AMMR Guarantees for minors

...

2. Each Member State where an unaccompanied minor is present shall ensure that he or she is represented and assisted by a representative with respect to the relevant procedures provided for in this Regulation. The representative shall have the resources, qualifications, training, expertise and independence to ensure that the best interests of the child are taken into consideration during the procedures carried out under this Regulation. The representative shall have access to the content of the relevant documents in the applicant's file including the specific information material for unaccompanied minors and shall keep the unaccompanied minor informed about the progress of the procedures under this Regulation.

Where an application is made by a person who claims to be a minor, or in relation to whom there are objective grounds to believe that he or she is a minor, and who is unaccompanied, the competent authorities shall:

- (a) designate as soon as possible and in any event in a timely manner, and for the purpose of assisting the minor in the procedure for determining the Member State responsible, a person with the necessary skills and expertise to provisionally assist the minor in order to safeguard his or her best interests and general well-being which enables the minor to benefit from the rights under this Regulation and, if applicable, act as a representative until a representative has been appointed;
- (b) appoint a representative as soon as possible and no later than fifteen working days from the date on which the application is made.

In the case of a disproportionate number of applications made by unaccompanied minors or in other exceptional situations, the time limit for designating a representative pursuant to the second subparagraph, point (b), may be extended by ten working days.

Where the competent authority concludes that an applicant who claims to be a minor is without any doubt above the age of eighteen years, it shall not be required to designate a representative in accordance with this paragraph.

The duties of the representative or the person referred to in the second subparagraph, point (a), shall cease where the competent authorities, following the age assessment referred to in Article 25(1) of Regulation (EU) 2024/1348, do not assume that the applicant is a minor or consider that the applicant is not a minor, or where the applicant is no longer an unaccompanied minor.

Where an organisation is appointed as a representative, it shall designate a person responsible for carrying out its duties in respect of the minor. The first subparagraph shall apply to that person.

The representative provided for in the first subparagraph may be the same person or organisation as provided for in Article 23 of Regulation (EU) 2024/1348.

3. The Member States shall involve the representative of an unaccompanied minor throughout the entire procedure for determining the Member State responsible under this Regulation. The representative shall assist the unaccompanied minor in providing information relevant to the assessment of the best interests of the child in accordance with paragraph 4, including the exercise of the right to be heard, and shall support his or her engagement with other actors, such as family tracing organisations, where appropriate for that purpose, with due regard to confidentiality obligations towards the minor.

[....]

Provisions on management of guardianship including case load, supervision and support.

As regards Article 23 (10) APR below, EGN notes that what is a proportionate number of children per guardian depends on how guardianship is organised, how individual guardians are resourced, the complexity of individual cases, and what roles guardians play in different procedures. Consequently, States should carefully design a caseload provision, in line with their national guardianship systems, which ensures that the guardian does not have an excessive caseload. It should be noted that a caseload of 30 children per guardian will represent a disproportionate number in some systems.

For inspiration, see article 23(10) APR:

- The competent authorities shall place a natural person acting as representative or a person suitable to provisionally act as a representative in charge of a proportionate and limited number of unaccompanied minors, [...] ~~and under normal circumstances, of no more than 30 unaccompanied minors at the same time,~~ in order to ensure that he or she is able to perform his or her tasks effectively. ~~In the event of a disproportionate number of applications made by unaccompanied minors or in other exceptional situations, the number of unaccompanied minors per representative may be increased up to a maximum of 50 unaccompanied minors.~~ Member States shall ensure that there are administrative or judicial authorities or other entities responsible to supervise, on a regular basis, the proper performance of tasks by the representatives and persons designated under paragraph 2, first subparagraph, point (a), including by reviewing the criminal records of those appointed representatives and designated persons at regular intervals in order to identify potential incompatibilities with their role. Those administrative or judicial authorities or other entities shall review complaints lodged by unaccompanied minors against appointed representatives or persons designated under paragraph 2, first subparagraph, point (a).

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