PROGUARD

Piloting a Tool for Self-Assessment and Strengthening National Guardianship Systems in Europe: Lessons Learned and Recommendations for the Future

The ProGuard partners[1] involved in the development of the PAS are convinced that the PAS has significant potential to support the enhancement of guardianship systems for unaccompanied and separated children in migration across Europe.

This paper reviews the development and piloting of the PAS for the purpose of sharing lessons learned. It also makes concrete recommendations for the future use and continued development of the PAS.

Rebecca O'Donnell (Child Circle)

Laure Vierset (Missing Children Europe)

Liedewij de Ruijter de Wildt (Nidos)

September 2019

---

[1] The Danish Red Cross decided not to take part in the PAS.

Contents

Introduction

Within Europe, there is an increasing awareness and focus on the need for robust national systems of guardianship of unaccompanied and separated children from third countries.

There is also an increasing awareness of the need to improve cross border cooperation on cases of children of interest to more than one country (e.g. in Dublin transfer cases, or in cases of trafficking), with the involvement of guardians/guardianship authorities.

At EU level, guardianship has been the focus of attention and resources, in the ongoing legislative reform of the common European asylum system (in which proposals have been made for reinforced provisions), through the recent important guidance on guardianship from the Fundamental Rights Agency and the Commission, and the work of European Asylum Support Office in capacity building initiatives. The EU has funded the development of an European Guardianship Network as well as a range of projects in the area. The Council of Europe is also developing recommendations on guardianship.

Against this background, the ProGuard project aimed to contribute to improve guardianship across Europe, including through the development and piloting of a "pilot accreditation system" for guardianship systems. The ProGuard application referred to *a pilot accreditation system, including a number of criteria against which guardians and guardianship systems could be evaluated, will be piloted in the countries participating in the project, as a test. ... The standards of the Pilot Accreditation System will be logically derived from toolkit and recommendations but will also connect to the Child's Rights Convention and the 10 principles for child protection.*

I.   Development of the PAS

Within the project partnership, Missing Children Europe, Nidos and Child Circle were tasked with the development of the PAS. They consulted with the partners at various points in its development, as well as with stakeholders broadly during the stakeholders' meeting in March 2019.

This section recalls the key stages of the development of the PAS and describes key building blocks of the PAS.

1.   Purpose of the PAS - the starting point

The first question for the ProGuard partners was: what should be the scope and purpose of the PAS?

The PAS was conceived as a tool to address the guardianship *system.* This goes to a key aim of ProGuard: namely to contribute to the development of enhanced guardianship systems in Europe.

During discussions, the partners agreed on developing a tool for use by the national guardianship systems through which national systems will be able *to assess themselves how the system fulfils common and transparently defined general European standards*.

As to terminology used in the application - a pilot accreditation system - the partners were conscious that one common understanding of the term accreditation is the process in which certification of competency, authority, or credibility is presented. Organizations that issue credentials or certify third parties against official standards are themselves formally accredited as accreditation bodies. However, ProGuard was not intended to establish/identify an European accreditation body to judge whether national guardianship systems meet particular standards. Partners agreed that the project's intent is

to create a tool that each national system can use for its own purposes to assess and further develop its own guardianship system. This point was also emphasised in observations of several stakeholders consulted in the development of the standards. For this reason, and to avoid any doubt, it was subsequently agreed that the tool developed by ProGuard should be called a *pilot assessment system* for national guardianship systems. We will refer to it as a pilot assessment system (PAS) here.

The question of whether a tool like the PAS may ultimately evolve into a regional accreditation system by a regional body, could be reviewed in the future, should that become useful to Member States, appropriate and possible.

> **THE PURPOSE OF THE PAS: Member States and national actors can themselves use the PAS to assess their national guardianship system's strengths and weaknesses and reflect on opportunities for progress. Importantly, having such a tool also provides a common framework for Member States and national actors to identify, describe and share information on features of their guardianship system with each other. Its use should make it easier for Member States and national actors to share experience and good practice and to identify common tools and guidance and indeed to work together across borders.**

2.   What are the key foundations of the standards for the PAS?

When developing the PAS, the next central question to address was: what standards should be used to assess the very different models of guardianship across EU Member States and how?

As background, EU law provides a number of general provisions concerning the role of the guardian, but it is for Member States to determine exactly how guardianship responsibilities are organised.

There are very different models of guardianship in different States, depending on how reception and care for unaccompanied and separated children are organized in those countries, the roles of the different actors involved and how many unaccompanied children typically are received by a State.

For example, we see that some countries are just beginning to develop their formal systems of guardianship for unaccompanied children (e.g. Italy and Greece) whereas some countries have more mature systems (e.g. Netherlands and Denmark). Some countries base themselves primarily on their local guardianship system for all children (e.g. the Orphan's Court in Latvia) whereas others have special arrangements focussing on unaccompanied children outside their countries of origin. Some countries have the same system nationwide (Netherlands, Denmark), whereas others (such as Germany, Italy) have local variations. Some countries have significant experience dealing with guardianship for unaccompanied and separated children, in some countries smaller numbers of such children have been involved (Latvia and Croatia). Some countries have guardianship institutions (Netherlands), others are coordinated by NGOs (Danish Red Cross). Some countries have volunteer guardians (Italy), others have professional guardians, whereas some systems are hybrid models of volunteers and guardians.

In some systems, guardians play a central role in fulfilling the parental responsibility a State owes to a child who is deprived or parental care and takes decisions, as a parent might, on care plans and arrangements (e.g. the Netherlands). In other countries, the guardian's role primarily concerns supporting and assisting the child and acting as a link to other actors involved in discharging key responsibilities towards these children (e.g. Denmark). In most if not all countries, the guardian complements the child's legal capacity if it is limited, and thus can ensure applications for status determination are made as appropriate. In some countries, the guardian's role primarily focuses on

supporting the child in engaging with the procedural questions that face them; in other countries, the guardian's role also concerns ensuring the child has support and assistance in relation to their reception and care. In all countries, the role of the guardian is distinct from those actors who provide legal counsel and representation, where this is available.

> **THE PAS IS FOUNDED ON COMMON PRINCIPLES FOR GUARDIANSHIP AND DOES NOT IMPOSE A UNIFORM MODEL** Consequently, the PAS does not aim to prescribe a uniform guardianship *model* on countries. Instead, the PAS aims to identify *the common principles* each of these different national models, in their different ways, can aspire to fulfil.

Consensus has been growing on common standards which guardianship systems in Europe should fulfil, guided by EU law (the CEAS and EU Trafficking Directive), and through review of national experience and good practice. The recent [handbook](#) from the Fundamental Rights Agency, borne out of regional consultation with Member States and stakeholders, identified the fundamental principles of guardianship. The [Commission principles for integrated child protection systems](#) contains ten principles, which are relevant and overlap with the principles contained in FRA. Upcoming Council of Europe guardianship recommendations will also be helpful.

Consequently, the partners determined that the standards underlying the PAS derive from the European Commission and the Fundamental Rights Agency Handbook on guardianship for children deprived of parental care. These are related directly to the EU law and policy environment. The Handbook is translated into all of the EU languages and serves as an invaluable resource to support the PAS.

> **STANDARDS FOR THE PAS** The PAS uses the general principles in the FRA and Commission handbook on guardianship as the basis for the standards to be fulfilled by guardianship systems, namely, non-discrimination, independence and impartiality, quality, accountability & responsibility, sustainability and collaboration and child participation. These six principles largely concern how a system should function and we also we added a seventh principle to address the role a guardian should play, namely that the system should be child rights centred.

3. What does each standard look like?

The next step in the PAS development was to turn each of these principles into a standard against which a system could be measured.

Each of these standards was then associated with indicators which address different elements of the standard and how it can be fulfilled. These are further broken down into sub indicators which allow us to provide different alternatives, which is are based on different possibilities and national practices.

The standards are defined in a child-centred manner and the indicators and subindicators will also support the respondents in demonstrating the way in which the system fulfils the rights of children.

Table: Structure of the PAS - tool

Principle		
Standard		
Indicator	*Sub-indicator*	
	Element	*Regulatory environment*
		Management of guardianship
		Practice

Respondents are prompted to indicate whether and how sub-indicators are met by the different elements of the guardianship system as relevant. The three elements are (a) the regulatory environment (law & policy) which underpins the system; (b) the manner in which the guardianship system is managed; and (c) typical practice of guardians. Questions concerning typical practice are not intended to measure the performance of guardians. They are posed because, in some countries or in relation to some dimensions of guardianship, where the regulatory and management system is not extensive, the state of play can only be assessed through reviewing typical practice of guardians (the de facto national guardianship "system").

The PAS thus focuses on examining what structural elements of guardianship system are in place and thereby can measure the capacity of a system to fulfil the standards. It does not evaluate the operation of the system day to day nor is it intended to act as a tool for assessing the individual practice of guardians.

4   Who should be involved in undertaking the PAS, when and for what purpose?

A further step in developing the PAS was to identify which actors should be involved in undertaking the PAS, when it should be undertaken and for what different purposes.

Who should undertake the PAS?

The partners believe that, ideally, the assessment should be undertaken by actors who:

- Are familiar with the system
- Are responsible for the system (ideally) or are working to raise awareness or improve the system in countries where the system is under development (e.g. multi-agency task-force or an ombudsman)
- Deliver the service

The assessment should provide input from different perspectives of the system. It should reflect the views of all actors involved with the system, including both guardians and actors working with guardians. It might also take into consideration the experiences of children (in the first instance

through existing information gathered on this). It might involve an independent evaluator and/or an external facilitator.

When should an assessment be undertaken?

The PAS anticipates that an assessment should be undertaken on a periodic basis (potentially annually or every two years). It could potentially be linked/take into account other monitoring or budgetary processes.

Ideally it would be used in a national review, in the hands of the institutions in charge, in consultation with all relevant stakeholders. But we recognize that the PAS might also be used by other organisations to promote better guardianship, at local level as well as national. A range of organisations might be interested to do so, including ombudspersons for children, child rights and protection organisations, lawyers.

For what uses can the PAS be deployed?

A number of different types of uses have been suggested:

- In-depth assessment of the structure of the system
- Building a big picture of getting a fast-read out of current state of the system
- Modular approach, doing one principle, or a number of principles or the full set
- Focusing on a particular need – e.g. strengthening and improving coordination
- As a management tool – to inform budgeting, funding, working streams
- Mapping a system (What is in place / What is not in place?)
- Sharing information on the system or key practices internationally
- Supporting training of key actors

There may be different ways of using it – for example, to raise awareness on the need for better guardianship, to start a conversation amongst actors on how best to build or change a system, to work towards improving existing systems.

5.   How to assess whether the standards are met?

A key consideration in the development of the PAS was how respondents could assess the overall extent to which standards are met. The PAS pre pilot anticipated that the assessment could be based on:

- A scoring system: potentially based on a traffic light system, with grading or colours, including a piechart of colours to show how all the sub-indicators under one indicator are met and to give an impression of the extent to which a principle is fully met or
- An action-oriented output: using icons for actions such as green tick for ok, orange arrow for room for improvement, yellow lightbulbs: things to think about, redflags: urgent need for improvement

We also anticipated a number of elements need to be borne in mind by countries when undertaking assessments.

a) Certain of the standards can be met in a clear cut way (yes or no), regardless of the national context, for example, independence and impartiality.

However it is not always so straightforward to see how a standard is met, for example, as regards the actual role of the guardian. Guardians do not exercise their roles in a vacuum but should be seen as an element of the overall system of care and protection for unaccompanied

and separated children. For example, in a national or local system where social workers are assigned actively to manage the care of a child, then the role of the guardian may necessarily be more in the nature of assisting the child and overseeing what is done. Consequently there needs to be a way to ensure that any assessment can factor in the national context as a whole.

b) Another challenge is how to look collectively across standards and indicators, which can be interdependent.

As an example, the standard on quality will anticipate different ways in which training will be managed, e.g. NGOs undertaking supervision and training rather than a government authority, but clearly where or not this can really ensure quality will depend on measuring sustainability of NGO involvement.

6.   Ensuring progress: outcome oriented follow up

In developing the PAS, we were conscious of the key consideration that, if effort is invested in undertaking the PAS, the process should leave them equipped to enhance the system and ensure progress. It is vital to ensure that the follow up to the assessment to be practical and outcome oriented. We identified a number of follow ups from using the PAS process are possible.

(a) Within the country concerned

A key outcome of seeing what sub-indicators are met or not would be that actors automatically have sources of inspiration of areas for progress. Some examples:

Quality:

- *improving qualifications and skills*
- *improving support and resources are available to guardians to do their work (e.g. access to interpreters, cultural mediators, legal information, legal advice....)*

Responsibility & Accountability :

- *having a case management system*
- *ensuring periodic monitoring and evaluation*

Child Rights Centred :

- *involving guardians in individual needs assessment is carried out by authorities in charge of reception*
- *Involving guardians in ensuring risk is properly identified and addressed; e.g. sexual abuse or trafficking, certain cases involving child brides*
- *enhancing guardian's ability to deal with legal and technical issues: including cross border issues, including disappearances and Dublin issues. status determination; age identification processes; appointment and access to children in cases of detention*

Each step in the PAS was developed also to allow States to reflect on what measures might be available to improve their systems (e.g. changes in policy, improved management such as additional measures of support such as training, or clarifying or bolstering the role of the guardian in specific situations).

Although some of these areas for improvement may be self-evident, others are less so. Moreover, the cumulative effect of a comprehensive review also allows respondents more effectively to prioritise between them, identify alternative actions and develop a timeline for progress.

For this reason, the partners anticipated that the outcome from the assessment might be the development of a roadmap for progress (see further III, IV and V below).

(b) Exchange between countries

Another potential outcome of the assessment will be that it effectively allows for comparable profiles of national guardianship systems in Europe and therefore to promote the exchange of good practices and resources between systems.

This could be a core tool for the European Guardianship Network that the Commission is supporting, and an opportunity to learn from each other.

7.   Striving for sustainability of the PAS

From the outset, sustainability of the PAS was seen as a key objective in its development.

The European Guardianship Network was identified as having potential to provide a platform to encourage the practice of self-assessing within the common general standards and an exchange of good practice and challenges between members of the network.

Throughout its development, the ProGuard partners also consulted widely and encouraged to disseminate widely with a view to encouraging actors to work with the PAS and further develop it.

The partnership also actively engaged with key actors in the field of guardianship, including the EU agencies most concerned by guardianship - FRA, EASO - and the Council of Europe, who was working on recommendations on guardianship during the period.

Finally, the partnership also looked to establish links with the work of other regional projects on guardianship, including G.A.IN and ASOP4G – Alliance for Children on the Move.

II. The piloting process

The PAS was discussed during partnership meetings throughout the project. It was introduced and discussed at a stakeholder's meeting in March 2019 and piloted/reviewed by partners and stakeholders May-August 2019.

1.   Stakeholder Meeting

In March 2019, a stakeholders meeting was held in Brussels with a broad range of participants from regional institutions, organisations and national agencies, ministries and international organisations. The development of the PAS was discussed, followed by a workshop in which groups worked to provide input on several key questions such as how it could be carried out in practice and for what range of purposes. This yielded extremely valuable input.

2.   The Piloting

The piloting process took place between May 2019 and August 2019 and had as its objective to assess the relevance, comprehensiveness and utility of the pilot self-assessing system.

The PAS has been piloted by:

- Croatia: Center for Missing and Exploited Children together with the Deputy Ombudswoman for Children and Tatjana Holjevac, legal expert

- Finland: National Institute for Health and Welfare, together with the Ministry of Economic Affairs and Employment and the Finnish Immigration Service, and ETU ry (the Finnish guardians' association)
- Germany: Jugendhilfe Sued Niedersachsen (JSN)
- Italy: Amici dei Bambini (review of the tool)
- Netherlands: Nidos

A planning tool was created to facilitate the process and with the aim of supporting partners in deciding which steps of the piloting process they would undertake (Annex 1). That helped manage the time constraints and capacity limitations of all partners involved, as they could choose to undertake one or several of the following steps of the piloting:

1) Reviewing the introductory explanation of the PAS (embedded in the tool)
2) Reviewing one or all principles of the tool
3) Providing feedback on the process itself of filling the tool
4) Providing feedback on the format
5) Sharing ideas, opportunities and challenges on the use of the PAS at the national level

During the pilot period, the PAS tool was also subject to review by:
- EASO
- FRA
- UNCHR Austria
- UNHCR Belgium
- The office of the European Commission Coordinator on Children's Rights

The partners are very grateful for their engagement and important input to the PAS.

The PAS was provided with a guidance document on its scope and use. At this stage of its development, the PAS was made available in word format. When piloting and reviewing the tool (1 and 2 above), partners were asked to give their comments on a feedback form, for each principle of the PAS piloted. The feedback form, embedded in the PAS, included the following questions:

· Do you have general feedback on the draft?
· Are the standards clear?
· Are the indicators clear?
· Are the questions under the sub indicators clear?
· If not, which ones need to be changed or what should be added?
· Do you foresee any problems with filling it out?
· Do you think it would be useful to add examples of how to fulfil the standards and for which indicators would this be most important?
· Do you have any suggestions on the process for undertaking the PAS?
· Do you have any suggestion on what the outcome of the assessment could look like? E.g. traffic light system or action oriented recommendations?

III. Lessons learned

Through the pilot process, the partners sought to explore how the exercise of filling the tool itself was experienced by the partners and the scope under which it should be undertaken in the future. That included reflecting about the professionals (and other stakeholders, including children) which should

be involved, how regularly the assessment should take place, which knowledge is necessary to use the tool, whether external facilitation would be an added value, how to present the outcomes and how to follow-up on them to improve the existing guardianship systems. Feedback on the format of the tool was also very important to see how this might be developed further.

It also included understanding how the tool could help the guardianship system and other parties involved (e.g. child protection system, authorities, …) to analyse outcomes, room for progress and connect with existing resources.

It was very interesting to see that different partners undertook the exercise in different settings. Some partners piloted the PAS internally, within their own organisations, whereas other partners have included their governmental counterpart. Some have undertaken the exercise in one day or less, whereas some have broken down the pilot into different phases. Some focused on reviewing the tool, whilst others sought to use it and provide feedback on its use.

Further piloting - and more in-depth piloting - would be welcome in the future. However, the diversity in the experiences of the piloting process within the project already greatly assisted the partners in identifying improvements to the tool and its future opportunities and possible outcomes. Some of the suggestions/reflections from the PAS have been taken into consideration in the recommendations for future development and use as noted in Section V below.   Other specific suggestions for amendment/our own reflections have already implemented in the PAS post the pilot, as noted in Section IV below.

Key points are summarized here.

The first major learning resides in the relevance and importance of the tool. Conducting the assessment was assessed to be useful and feasible. The PAS was understood as clear, comprehensive and well structured around elaborated indicators and sub-indicators. Some areas for improvements have been highlighted and addressed in the post-piloting version of the PAS (see section IV below), such as: the need for further examples; of a navigation panel; or of a numbering and color-coded system, all addressed. In some instances, the tool was also perceived time-consuming and relatively long, which could be improved by transferring to another format.

<u>Format</u>

The current word version presents the disadvantages of being long. There is definite room for improvement on the user friendliness of the tool. The format could benefit from shifting to another platform, like an online tool such as SurveyMonkey or a more professionalised tool. Shifting towards an online tool would present opportunities for improving how the assessment is undertaken and how the results are analysed, such as cross-referencing between principles, standards and indicators; the possibility to add dropdown boxes with tailored guidance within the tool; the potential to improve the clarity of the questions through a different format (e.g. 3 columns on "regulatory environment"; "management" and "practice" could be placed next to each other to illustrate that the same issue is being enquired into across the different elements of the guardianship system. It is helpful to do so in particular given that these elements have different importance in different national settings. For example, in some countries there is a very detailed regulatory environment, whereas in other countries there is limited law and policy in the field; in some countries there is very limited law and policy, but much is achieved through active management of the system. Having columns of these dimensions, side by side, guides the respondents better in answering the questions and mapping their system within the tool.

Content

The piloting process also enriched the content of the tool, with improvements on the precision of key terms used, as well as suggestions for future development. The latter include, for instance, adding a section on privacy/confidentiality and record keeping of children's and guardians' data, and making a clearer link between child protection and guardianship systems.

Outcome & presentation of results

The piloting process also helped us in enhancing the initial ideas for how outcomes can be assessed and how this can support the follow-up of the assessment.

The current process for presenting results is an action-oriented outcome, reflected in the Grid for Change (Annex 2) which was preferred by some of the partners. Nonetheless, other ideas have emerged, and we are presenting a very short summary here.

In pre-piloting phase, a scoring system was suggested. However, after piloting, it became clear that it was going to be difficult to implement since questions at sub-indicator level do not always have clear measurement characteristics and could not be comparable with others. While the scoring systems might help prioritizing outcome-oriented actions, we have found other ways for assessing the results which allow for priorisation. These are described in the recommendations section below (cf. action plan).

Other suggestions were presented and would benefit of being further investigated. This includes the presentation of results through a spider chart, giving a short and complete vision on how a system is doing well overall. A visualization on the level of the "principles" as a spider diagram might help management easily to see where strengths and weaknesses are in their system and in which fields they should invest more. Such a system would however require to be closely matched with an online PAS, allowing for an automatic analysis and display.

Scope & process of using the tool

ProGuard's partners piloted the tool in various ways, all within their different and diversified national contexts. Through these various processes, we understood that the tool might seem complex and discouraging for a first-time user who never heard of it before. Despite efforts to improve the structure, some guidance (e.g. external training or video-guidance) might prove helpful in engaging national and local actors in using the tool.

The tool proved very useful when piloted by a multitude of stakeholders involved in Guardianship. This was the case in Finland, where the tool was piloted by the ministry, immigration service and National Institute of Health and Welfare, which led to a discussion on the strengths and weaknesses and prompted a planning of training connected to both the toolkit and the train-the-trainer of programme – two other deliverables of the ProGuard project. In Germany, on the other hand, the piloting process demonstrated some real challenges in a system that guardianship is mainly organized locally. There are clear obstacles to undertaking an assessment for local players, in a fragmented system, which would eventually lead to difficulties in providing an overview and connecting different actors with each other. However, the PAS was said to have the potential to act as a tool to achieving more frequent and regular connections between the different stakeholders involved in the decision-making around guardianship, for instance by exchanging results and information with other countries using the PAS. In the Netherlands, in a system that is extensively developed, flexibility was pointed out as the key for the process of using the PAS. In Croatia, the process would benefit from being done online and integrated into the annual assessment and monitoring exercise of the Ombudswoman for

Children, who is obliged to submit such an exercise to the Croatian Parliament. In Italy, the review of PAS pointed out it is a very flexible tool due to its modular approach and that it would benefit from being translated in each European language to make it more approachable.

IV. Changes to the PAS post the piloting phase

Following the PAS piloting process, we amended and further developed the PAS to include some of the proposed changes from the partners and stakeholders.

Order of standards

We changed the order of the standards within the PAS to ensure the role of the guardian within a particular system is addressed earlier and consequently can be usefully covered prior to assessing participation, quality, sustainability and collaboration. Accordingly, the new order to the standards is:

1. Non-discrimination;
2. Accountability;
3. Independence;
4. Child rights centred;
5. Participation;
6. Quality;
7.Sustainability & collaboration

Navigation Panel

We have also integrated a navigation panel, allowing any user of the tool to get an early snapshot of the entire tool to support their input in the tool. On the format, we have streamlined some of the questions with "check the boxes" approach where possible.

Scope

We have clarified the scope of the children covered by the tool, specifying that the PAS covers both unaccompanied and separated children.

Clarifications

Content-wise, additional questions were added to assist the measurement of some sub-indicators. We also inserted an introduction describing the different models of guardianship, with the aim of ensuring that respondents can anticipate when certain subindicators may be most relevant to particular models. We also used different colours for each of the elements of guardianship (i.e. regulatory environment, management and typical practice) to assist respondents in recognizing that an issue is being addressed across the three different elements of the guardianship system. We added further definitions and acknowledgement that different systems may use different terms for guardians (e.g. (legal) representatives). To manage expectations and potential risks, we clarified further the purpose of the PAS and its self-assessment purpose.

Grid for Change

To ensure that the desired outcome for progress is clear to the person undertaking the PAS, we have added a grid for change (see section above).

V. Recommendations for future development and use of the PAS

The ProGuard partners involved in the development of the PAS believe that it has significant potential to generate and support improvements in guardianship across Europe.

Guardianship of unaccompanied and separated children in migration greatly matters both to children and the States which have duties to provide protection and special assistance to them. Guardians act as the main point of contact to represent, assist and support unaccompanied children by safeguarding the child's best interests and wellbeing. In some systems, guardians also ensure that the child's basic needs are taken care of and assist children in asylum and family tracing procedures. By ensuring that guardians are qualified, trained and appointed swiftly, childcare professionals can build trust with these children and also help prevent them from going missing.

However, guardianship schemes are not in place in all Member States and when there is a scheme, these may not be of the same quality. Research on guardianship standards in twelve Member States suggests that there is a need for considerable improvements, such as timely appointment and clarifying roles.

As has been discussed at the European Guardianship Network meeting in September 2019, the PAS can be used in many different ways for the purpose of achieving progress, in a manner that takes account of the differences in national contexts across Europe and the real opportunities that exist in the short, medium and long term to strengthen guardianship.

Although the ProGuard project comes to an end in September 2019, Nidos, Missing Children Europe and Child Circle intend to continue our joint efforts to further develop and support the use of the PAS. We will seek resources and commitments to support this work. We invite interested stakeholders to take contact with us to learn more and to become involved. Equally, several of the ProGuard partners are members of the European Guardianship Network and will have the opportunity to continue their engagement and share experience of using the PAS in that setting.

Having shared the process of its development and lessons learned in this report, we now share our key recommendations for the future development and use of the PAS. They include:

A. Ensuring the sustainability of the PAS

Guardianship systems are constantly evolving alongside the migration context in Europe. A tool such as the PAS must therefore keep up with these evolutions and remain as relevant as possible as the regulatory, management and practice contexts evolve.

Not only must the tool be up-to-date, but it must be known and used on a periodic basis to bring value to the systems it applies to. Ownership of the tool is necessary, at the regional, national and European level, to ensure its sustainability.

Ideally, such a responsibility falls within a body or working group, with the necessary capacity, interest and outreach. This a role can potentially be played by a variety of stakeholders, including civil society organisations with the required networks and expertise in the guardianship system.

The PAS should ideally also ensure support to the stakeholders undertaking the PAS, engagement and dissemination efforts to ensure buy-in from the relevant institutions, and funding to support the activities linked to it.

1) The involvement of the European Guardianship Network (EGN)

The project 'Touchstone: towards a robust European Guardianship Network (EGN)' started in September 2018. It is funded by the European Commission and managed by Nidos. It aims to develop a network of institutions and agencies who work in the area of guardianship for unaccompanied and separated children. The vision of the European Guardianship Network is to create an inclusive and supportive environment which will enable members to contribute to the development of effective and consistent ways of delivering high quality, child rights-based and accessible guardianship services. The Network will be a welcoming and enabling forum for the development of best practice that will put the rights and best interests of separated and unaccompanied children at the heart of its work , leading to better outcomes for children and the guardianship services who work with them. The Network has great potential to have a key role in improving the cross-border cooperation between guardianship systems, the exchange of information and good practice.

The outcomes and deliverables of ProGuard were officially delivered to the EGN during its network meeting in September 2019 and it was agreed that the Network will further discuss the way that the results of ProGuard can contribute to the network's mission to develop safe, effective and consistent ways of delivering high quality, child rights based, and accessible guardianship services in the near future.

Individual members who were present at the meeting provided feedback on what practical steps they might take to use or promote the PAS in the near future in their own context as follows:

- Presenting it to my team and having a discussion on adapting it in our practice
- Using it to understand reach of current guardianship service and identify gaps at different levels
- Reviewing how the framework of principles and indicators can operate in context
- Asking the government to take the initiative to evaluate the system with it
- Trying to work with regional governments to get them involved in the assessment of the system and the introduction of the guardian
- Using it to test our guardianship model
- Giving information on the PAS to stakeholders in my country to try to promote a pilot
- If appropriate, working within EGN to further develop the PAS and encourage members to use it
- Using it as tool to check the actual delivery
- Using it to assess the system at a local level
- Using it to assess the current social welfare system and advocate structural changes/funding specific to needs of unaccompanied children

2) Explore how the PAS can be connected with other processes

Actors continuing to explore the use of the PAS would most likely see benefit in engaging with other stakeholders, such as local civil society organisations involved in guardianship and/or governmental institutions and Ombudsmen for children. This engagement can take the form of a consultation on the content of the tool but can also be centred around the important role that the PAS can play in advocating for better guardianship systems in Europe. Some countries may already have evaluation systems, it is therefore also important to consider synergies and avoid overlapping processes.

3) Seek funding dedicated to further piloting and developing the PAS and to support its use

Additional funding is necessary to ensure that the recommendations included in this report are followed-up upon and the PAS reaches its full potential. Additional funding may for instance be necessary to cover the further development of the tool (see section B. below), to further pilot the tool and analyse the experience, and to support the engagement and dissemination efforts in Member States, in order to ensure the ownership and sustainability. It may also be possible to explore funding opportunities for technical assistance to Member States in the use of the PAS and the implementation of the recommendations to strengthen guardianship.

B. Developing further the PAS tool itself

A few recommendations can be made to ensure the continuous development and professionalization of the PAS in the future:

1) Prompted by the pilot, consider the development of an online version which might allow for:
   - Drop down boxes including more explanations per section. The tool currently relies on the introductory guidance and would benefit from being categorized per relevant sections
   - Three columns to be used – e.g. side by side – at the subindicator level "regulatory environment, management of guardianship and practice of guardians", in order to mitigate the sense of repetition and clarify the fact that one is assessing whether or not the same principle is met in different dimensions
   - Cross-referencing between certain indicators and subindicators, where there is a relationship between them
2) Continue adapting the content to evolving context.
   That includes gathering and adding further practical examples to the indicators, and address practical issues such as the length of the exercise, taking into account our wish to be as comprehensive as possible and to account as much as possible to any guardianship system's specificities.
3) Pursue the development of the grid for change (annex 2) by:
   - Developing a list of recommendations for action per principle, giving possibilities for progress and illustrations of types of activities that could achieve it. This could be achieved by a structured exchange of national experiences, potentially based on a case studies library
   - linking the grid's space for recommendations to above-said inspiring recommendations
   - enabling cross referencing of recommendations to better reflect the specificities of any guardianship system and the necessary interdependence of progress on standards
   - including a time frame suggestion for action (e.g. short-, mid-, or longer-term perspectives), as progress may need to be incremental or may depend on different timeframes (e.g. policy changes might take longer time than practice changes)
   - Exploring the added value of including the grid after each standard section in the tool
   - Considering adding a draft action plan /roadmap for progress at the end of the PAS, that draws all recommendations across each of the standards and allows further planning (e.g. prioritization, activities, timeline).

Annex 1: PAS pilot planning tool

COUNTRY: ………………	What?	Who?	What do we want to learn?
	1.PAS Explanation Review	Partner	• Clear? • Should anything else be explained? • Any additional ideas on points covered? • Anything missing?
		Reviewed with the following Stakeholders: - -	
	2.PAS Tool Review (all principles)	Partner	Add on feedback form: • Clear in structure? • Clear in standards? • Too long? • Anything missing? • Any examples of sub-indicators needed?
		Reviewed with the following Stakeholders: - -	
	3. PAS Tool Review (one principle) ………………………….. (fill in principle reviewed)	Partner	Add on feedback form: • Clear in structure? • Clear in standards? • Too long? • Anything missing? • Any examples needed?
		Reviewed with the following Stakeholders: - -	
	4. PAS Tool Fill In	Partner	Outcome helps us assess: - Who should be involved? - What is a good process for filling it in? - What knowledge is needed to fill it in properly? - What were your problems? - What could help you do it? - Would external facilitation useful? - How to design the presentation of outcomes?

			- What can the PAS tool do to help you analyse outcomes, room for progress and link to resources that might help? - Ideas on what you would do with the assessment? - Any ideas on means to do the tool – survey monkey, other online tools etc?
		Filled in with the following Stakeholders: - -	
	5. PAS Tool Fill In (one principle) …………………………… (fill in principle filled in))	Partner	Outcome helps us assess: - Who should be involved? - What is a good process for filling it in? - What knowledge is needed to fill it in properly? - Would external facilitation useful? - How to design the presentation of outcomes? - What can the PAS tool do to help you analyse outcomes, room for progress and resources that might help? - Ideas on what you would do with the assessment? - Any ideas on means to do the tool – survey monkey, other online tools etc?
		Filled in with the following Stakeholders: - -	
	6. PAS Tool Fill in with Word & Survey Monkey	Partner	Ideas on format & process?
		Discussed with the following Stakeholders - -	
	7. Share a plan on how ideally the PAS would be piloted/used in your country, what would be the obstacles and opportunities	Partner	
	8. Give us numbers		• Who was involved in this pilot? • How many people? • How many organisations?

Annex 2: draft Grid for change

6. Quality (principle)				
Children are supported and assisted by qualified, continuously trained and well supported guardians who have sufficient time to respond effectively to their needs. (standard)				
Indicator	**Law**	**Management**	**Practice**	**Outcome**
6.1. Guardians are qualified	X	X	V	V 🚩 💡 ➡️
6.2. There's a clear vetting mechanism for guardians				
6.3. Guardians are continuously trained	X	X	V	
6.4. Guardians have sufficient support and time to deal with each child				

X = not arranged

V = arranged

🚩 = in danger zone

💡 = things to think about

➡️ = room for improvement