

GUARD - U P

D4.4 Policy Report

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Table of Contents

1. Introduction	4
2. Croatia — National Policy Report	5
2.1 Introduction	5
2.2 National Context of Guardianship System	5
2.3 Key Challenges/Gaps Identified	6
2.4 Policy Recommendations	7
3. Greece — National Policy Report	10
3.1 Introduction	10
3.2 National Context of Guardianship System	10
3.3 Key Challenges/Gaps Identified	13
3.4 Policy Recommendations	14
3.5 Conclusion	16
4. Italy — National Policy Report	17
4.1 Introduction	17
4.2 National Context of the Guardianship System	17
4.3 Key Challenges/Gaps Identified	18
4.4 Policy Recommendations	19
5. Cyprus — National Policy Report	22
5.1 Introduction	22
5.2 National Context of Guardianship System	22
5.3 Key Challenges/Gaps Identified	23
5.4 Policy Recommendations	24
6. Belgium — National Policy Report	27
6.1 Introduction	27
6.2 National Context of Guardianship System	27
6.3 Key Challenges/Gaps Identified	28
6.4 Policy Recommendations	30
7. Poland — National Policy Report	33
7.1 Introduction	33
7.2 National Context of Guardianship System	33
7.3 Key Challenges/Gaps Identified	34
7.4 Policy Recommendations	35
8. Consolidated Policy Recommendations at EU Level	38

1. Introduction

1. Introduction

This document consolidates the six National Policy Reports produced under the GUARD-UP project — “Empowering Guardianship Systems to Improve the Guidance of Unaccompanied Children” (Grant Agreement No. 101140692) — co-funded by the European Union's Asylum, Migration and Integration Fund. GUARD-UP was implemented between 2024 and 2026 by a consortium of partners from Belgium, Croatia, Cyprus, Greece, Italy and Poland, working to strengthen the systems, services and professional capacities that underpin guardianship for unaccompanied children (UAC) across these six Member States.

Each national report reflects a shared methodology developed jointly by the consortium: a review of the national legal and institutional framework governing guardianship; an analysis of the good practices and gaps identified through desk research, stakeholder consultations, focus group discussions and national capacity-building activities carried out under Work Packages 2 and 3 of the project; and a set of prioritised policy recommendations shaped by the transnational co-design workshop held in Utrecht on 30 June – 1 July 2026, where guardians, authorities and civil-society representatives from all six countries exchanged experiences and jointly identified common European priorities alongside country-specific needs.

This consolidated report is structured as follows. Chapters 2 to 7 present, in full, the National Policy Reports for Croatia, Greece, Italy, Cyprus, Belgium and Poland respectively, each following the common template of national context, key challenges and gaps, and policy recommendations. Chapter 8 draws together the evidence and recommendations from all six national chapters into a set of Consolidated Policy Recommendations at EU level, addressing the systemic issues that recur across countries.

Taken together, the six national chapters and the consolidated EU-level chapter are intended to support national authorities, EU institutions and civil-society partners in strengthening the quality, consistency and effectiveness of guardianship for unaccompanied children, both within each Member State and across the Union as a whole.

2. Croatia — National Policy Report

2.1 Introduction

This policy report is prepared within the GUARD-UP project (101140692 – AMIF-2023-TF2-AG-CALL), co-funded by the European Union’s Asylum, Migration and Integration Fund. GUARD-UP works to strengthen the systems, services and capacities of 6 EU Member States so that they can better respond to the needs and rights of unaccompanied children (UAC). Building on Croatia’s National Action Plan (D2.1), the Good Practices Guide (D2.2) and the Training Needs Assessment (D3.1), which were all developed within this project, it identifies the key challenges in the Croatian guardianship system and sets out concrete recommendations for its improvement.

The Policy Report is intended to inform the national authorities responsible for the guardianship of unaccompanied children, and it contains the information, knowledge and recommendations collected during the transnational co-design workshop, which was held in Utrecht, 30 June – 1 July 2026. At this workshop, Croatian representatives of guardians of unaccompanied children and stakeholders of the national care system for unaccompanied children engaged in detailed discussions – both among themselves and with representatives of the other participating project countries – on the current state of the guardianship system and on potential recommendations for its improvement, jointly developing shared priorities and a common policy brief. Croatia’s long-standing position as a transit country, combined with a far-reaching reform of the asylum and migration framework now under way, makes timely action particularly important.

2.2 National Context of Guardianship System

Current system and recent figures

Every unaccompanied child who enters Croatia is assigned a special guardian who safeguards the child’s personal and property rights in all proceedings before the competent authorities, regardless of where the child is placed. In 2025 the authorities issued 1,248 decisions appointing guardians for UAC, of which 1,232 were designated professional staff of the Croatian Institute for Social Work (HZSR).

Croatia remains primarily a transit country: after a peak, the number of UAC seeking international protection fell from 1,980 in 2024 to 1,229 in 2025 (1,516 had been recorded in 2023). Many more unaccompanied children unfortunately pass through the country without being registered, often staying only briefly. This known transit dynamic in Croatia shapes guardianship at every stage: appointments must be made rapidly, contact with the child is frequently short-lived, and many children leave before their status is resolved, making continuity of care and follow-up difficult to sustain.

Key institutions and actors

The Croatian Institute for Social Work (HZSR) is the regulatory body responsible for the care and protection of UAC and appoints guardians through its regional offices; in practice guardians are mostly social workers who are working for the HZSR. In rare cases, guardians are named within the care services for UAC or within NGO’s supporting them in such placements. In 2025, 427 children were placed in social-care institutions (487 in 2024), most often in Community Service Centers (CPUZ) – Zagreb–Dugave (125), Split (94), Ivanec (89) and Osijek (59) – while children over 16 who express an intention to seek protection are placed in reception centers in Zagreb and Kutina. The

Interdepartmental Commission for the Protection of Unaccompanied Children (2022) was created with the idea of coordinating the stakeholders involved in the care for UAC. Civil-society and international actors – the Croatian Law Centre, the Croatian Red Cross, UNHCR, UNICEF and the Center for Missing and Exploited Children, among others – provide legal aid, training, mediation and support.

Legal and policy framework

The care system for UAC in Croatia rests on the UN Convention on the Rights of the Child (1989) and the EU Strategy on the Rights of the Child (2022–2027), and nationally-specific on the Aliens Act (2020), the Act on International and Temporary Protection (2023, amended 2025), the Social Welfare Act (2023) and the Family Act (2023). Since these responsibilities are split across immigration, social-welfare and family law, applying the framework coherently relies heavily on strong coordination between institutions. Therefore, the Protocol on the Treatment of Unaccompanied Children (2018) should be the central operational document – it defines duty-bearers, procedures and deadlines – but it is a guiding document rather than a legally binding act and now needs updating to reflect legislative change, the temporary protection regime for people displaced from Ukraine, and the wider asylum and migration reform.

Recent developments and reforms

The EU Pact on Migration and Asylum applies from 12 July 2026. It shortens the deadlines for appointing a guardian, tightens standards for guardians' training, qualifications and oversight, makes a multidisciplinary age assessment mandatory (with a presumption of minority where the result is unclear), reinforces safeguards on detention, and accelerates access to education and healthcare. Nationally, amendments to the Act on International and Temporary Protection have strengthened the guardian's role: a guardian is appointed immediately and must promptly act on family tracing and reunification. Two encouraging shifts emerged in Croatia in 2025 – the first foster-care placements for UAC (seven children) and the employment of intercultural mediators at CPUZ Zagreb–Dugave. These developments collectively heighten expectations of the guardianship system precisely when its principal operational guidance, the Protocol on the Treatment of Unaccompanied Children, is both outdated and inconsistent with the new Pact on Migration and Asylum.

2.3 Key Challenges/Gaps Identified

The reforms now taking effect raise the standards expected of guardianship at a time when a number of structural, legal and practical weaknesses remain unresolved. The challenges set out below emerged most consistently from the co-design workshop and the underlying project analysis, and they cut across accommodation, data, staffing, legal standing, day-to-day practice and children's access to services.

Structural and operational challenges

The most serious and consistently identified gap concerns accommodation. With capacity continuously stretched even for domicile children in need of care, unaccompanied children are routinely placed in institutions for children with behavioural problems or, once over 16, in adult reception centres, where they are exposed to stigmatisation, trauma, violence, abuse and trafficking; institutions themselves report shortages of space, of suitable documentation and of timely placement decisions. It must be noted that there are changes underway in relation to accommodation capacity for UAC, as two of the institutions for children with behavioural problems have begun expanding their capacity to provide more beds for UAC. Data collection on UAC is equally problematic: records held

by the Ministry of the Interior and by the social-welfare system are neither unified nor comparable, producing inconsistent national figures and no single child identifier, which is a long-standing obstacle to evidence-based policy and to following a child reliably across services and borders. Staffing compounds both problems, as almost all of the 1,248 guardian appointments in 2025 fell to HZSR social workers who already carry full caseloads, frequently working outside regular hours and without additional compensation; the result is overload, burnout and less time for each child. Similar staffing issues also persist in care placements for UAC.

Gaps in legal, institutional and practical implementation

Several of these difficulties are rooted in the weak legal and institutional footing of guardianship. Because the Protocol is guidance rather than a binding act, case management is hard to standardise: no maximum caseload or minimum number of contacts is prescribed, and children are frequently seen by their guardian only once. No specific qualification is required to act as a guardian beyond general HZSR employment criteria, and specialized training is not yet mandatory, so knowledge, experience and motivation vary widely from one guardian to another. There is, moreover, no formalized monitoring or evaluation of guardians, no structured supervision, and no formal complaint mechanism through which the children themselves can raise concerns.

Challenges in daily practice and barriers to protection

In daily practice, the transit dynamic leaves little room to act. Short, often two-day stays and rapid onward movement allow little time for risk screening, language learning or inclusion in education. In the absence of relevant documents, age assessment is difficult, and children are sometimes presented or treated as adults and placed in adult facilities where the risks are greater. A persistent shortage of culturally sensitive interpreters (or even translation devices) forces staff to rely on available free online tools, undermining reliable communication and the credibility of children's statements. Barriers to services are equally pronounced: in education, children aged 15 and over are routed into adult programmes ill-suited to adolescents, while preparatory Croatian-language courses are insufficient and often begin months late, with no teaching assistants or adapted textbooks, and placement in lower grades fosters isolation and peer violence. Access to healthcare and mental-health support is uneven – with difficulties at clinics and pharmacies, Dublin returns without medical records, and a lack of specialized psychosocial programmes.

2.4 Policy Recommendations

The following recommendations build on the evidence gathered for the National Action Plan, the Good Practices Guide and the Training Needs Assessment, discussions held during the co-design workshop and on the priorities set out by the Ombudsman for Children in 2025. Indicative timeframes for the implementation of these recommendations are noted in brackets.

Policy and legal framework

- Strengthening the legal status of guardianship by moving the key elements of the Protocol into binding provisions – clear appointment criteria, defined responsibilities, minimum contact standards and an individual care plan – and updating of the 2018 Protocol to reflect the new legal framework, the temporary protection regime and the EU Pact. (medium-term)
- Establishing a specialized institution for UAC that offers central registration, needs assessment, psychosocial support, Croatian-language learning, health checks and

interpreters or cultural mediators under one roof, ending the placement of children in facilities for children with behavioural problems or in adult shelters. (medium- to long-term)

- Scaling up foster care for UAC through recruitment campaigns, dedicated training and ongoing support for foster families, building on the seven placements achieved in 2025. (medium-term)

Institutional coordination

- Empowering the Interdepartmental Commission to steer the system and resolve cross-sector bottlenecks, with broader representation of social-care institutions and civil-society organizations. (short-term)
- Establishing a centralized, integrated data system with a single child identifier and secure, real-time information sharing across social services, police, health and immigration authorities, enabling accurate figures and comparative analysis. (medium-term)
- Increasing accommodation capacity and specialized staffing at the designated contact points for the reception of UAC. (short- to medium-term)

Training and capacity building

- Making training mandatory and continuous for special guardians, institution staff and foster carers, structured across three complementary levels: (i) mandatory onboarding training for every newly appointed guardian; (ii) specialized, experiential training – covering the legal framework, best interest assessment, trauma-informed care, intercultural communication, risk recognition (trafficking, gender-based violence, exploitation) and psychological first aid; and (iii) responsive thematic training programmes that address emerging needs, for example on the Pact on Migration and Asylum or building on European Guardianship Network (EGN) trainings. This should be underpinned by a formal mechanism to monitor and evaluate guardians' work, in line with the EU Pact. (short-term).
- Ensuring a sufficient number of qualified guardians is available and that the authority responsible for guardians provides both their training and ongoing supervision, alongside peer mentoring and networking, drawing on the European Guardianship Network. (short- to medium-term).

Practical support for guardians and children

- Professionalizing the guardian role by establishing dedicated, trained guardians who work only with UAC, with manageable caseloads, clear mandates and a recognized, compensated workload. (medium-term)
- Ensuring education, health and integration for UAC from day one – Croatian-language learning with sufficient hours from arrival, teaching assistants, preschool access, interpreters and legal aid, specialized mental-health and psychosocial support, and child-friendly multilingual information – underpinned by a national integration strategy. (short- to medium-term)

Prioritization of recommendations

Implemented together, these measures would reduce the risks faced by unaccompanied children, ease the burden on overstretched guardians, and align Croatia's guardianship system more closely with the standards of the EU Pact on Migration and Asylum and the European Guardianship Network.

Priority	Recommendation
Short-term	Empower the Interdepartmental Commission; mandatory and continuous training plus a monitoring and evaluation mechanism for guardians; interpreters, legal aid and child-friendly materials; increased capacity at contact points.
Medium-term	Binding guardianship standards and an updated Protocol; a centralized data system with a single child identifier; scaling up foster care; professionalization of the guardian role; education, health and integration measures.
Long-term	Establish and sustain a specialized institution for the reception and care of unaccompanied children.

3. Greece — National Policy Report

3.1 Introduction

This Policy Brief has been prepared within the framework of the GUARD-UP project (Grant Agreement 101140692), co-funded by the European Union, which aims to strengthen guardianship and protection systems for unaccompanied minors (UAMs) across six EU Member States. The Centre for European Constitutional Law – Themistocles and Dimitris Tsatsos Foundation (CECL) leads the Greek national component. It is addressed to the Greek Ministry of Migration and Asylum (MoMA), the General Secretariat for Vulnerable Persons and Institutional Protection (GSVIP), Guardianship Service Providers (GSPs), EU institutions, and international organisations including UNHCR, UNICEF, and IOM.

The Brief draws on three evidence streams. First, the GUARD-UP National Action Plan for Greece (D2.1, January 2025), which integrates the PAS-Tool evaluation, desk research, two Focus Group Discussions with Guardianship Mandated Persons (GMPs) from METAdrasi and PRAKSIS, and a three-day field study visit (Athens, October 2024). Second, the GUARD-UP Good Practices Guide (D2.2, January 2025), which synthesises cross-country evidence from Belgium, Croatia, Cyprus, Greece, Italy, and Poland. Third, independent research drawing on: the EU Pact on Migration and Asylum (2024, in full application as of 12 June 2026); recent EUAA and FRA publications (2023–2026); Council of Europe Recommendation CM/Rec (2019)11; UNICEF and UNHCR Greece materials; Eurostat/EUAA data on UAM asylum applications; and the Asylum Information Database (AIDA) Greece Country Report 2024.

The Brief translates these evidence streams into concrete, prioritised recommendations designed to close the most critical gaps in Greece’s National Guardianship System for Unaccompanied Minors (NGSUM) and to align the system with EU and international standards at a moment of significant regulatory change.

3.2 National Context of Guardianship System

Greece occupies a structurally significant position in the European Union’s protection landscape for unaccompanied and separated children. Since the launch of the National Guardianship System for Unaccompanied Minors (NGSUM) in January 2024, more than 8.700 unaccompanied and separated children—primarily from Egypt, Afghanistan, Syria, Sudan, Iraq, Somalia and Bangladesh—have received guardianship services.

According to data recorded in EMPAA (National Registry for the Protection of Unaccompanied Minors) - the information system used by the Department of Institutional Protection and Guardianship (DIPG) to monitor the implementation of guardianship - 1.950 unaccompanied and separated children were under guardianship in July 2026. At that time, services were provided by 136 Guardianship Mandated Persons (GMPs) covering multiple geographical areas across Greece, along with 13 Temporary Representatives deployed at entry points (Closed Controlled Access Centers and Reception and Identification Centers), collectively covering approximately 93% of unaccompanied children in Greece.

Legal framework

Greece has established a comprehensive child protection framework through Law 4939/2022 (Government Gazette A' 111), as amended and supplemented by Law 4960/2022 (GG A' 145) and, most recently, Law 5307/2026 (GG A' 90). The framework introduced, inter alia, the National

Emergency Response Mechanism (NERM) for children identified in precarious living conditions and the National Guardianship System for Unaccompanied Minors (NGSUM).

Until the entry into force of Law 5307/2026, the NGSUM was governed by Law 4939/2022, as amended by Law 4960/2022, and further supported by the Interpretative Circular (ADA: 6TPΦ46MΔΨO-0ΦΘ), Joint Ministerial Decision 539638/2023 (GG B' 7143) on the complaints mechanism, and Joint Ministerial Decision 24578/2024 (GG B' 550) establishing the Guardianship Council for Unaccompanied Minors.

The NGSUM became operational on 1 January 2024, coordinated by the Institutional Protection Unit (IPU) of the General Secretariat for Vulnerable Persons and Institutional Protection (GSVIP). Following the organisational restructuring introduced by Presidential Decree 13/2026 (Government Gazette A' 43), the IPU was redesignated as the Department of Institutional Protection and Guardianship (DIPG) under the newly established Directorate for the Protection of Unaccompanied Minors, continuing to coordinate the National Guardianship System.

Since 12 June 2026, the guardianship system has operated within the framework established by the EU Pact on Migration and Asylum, transposed into Greek law through Law 5307/2026 (GG A' 90). The reform introduced Temporary Representatives as a mandatory procedural safeguard during screening and reception, ensuring representation from the earliest stages of arrival. It also aligns national legislation with the Pact's key child protection safeguards, including the prompt appointment of a guardian, a multidisciplinary approach to age assessment, exemption of unaccompanied children from accelerated border procedures in principle, and safeguards regarding guardian caseloads. While the standard caseload remains 15 children per Guardianship Mandated Person (GMP), the law permits, in exceptional circumstances, a temporary increase of up to 30 children per GMP, subject to safeguards ensuring that guardians can continue to effectively fulfil their duties in accordance with Article 23(10) of Regulation (EU) 2024/1348.

How the system operates: roles and responsibilities

The Ministry of Migration and Asylum (MoMA) holds overall institutional and legislative responsibility for the National Guardianship System for Unaccompanied Minors (NGSUM). It develops the legal and policy framework governing guardianship, allocates funding, and oversees the General Secretariat for Vulnerable Persons and Institutional Protection (GSVIP).

Within the GSVIP, the Department of Institutional Protection and Guardianship (DIPG), operating under the Directorate for the Protection of Unaccompanied Minors, is the competent authority responsible for the planning, organisation, coordination, monitoring, supervision and evaluation of the National Guardianship System. It develops operational procedures, issues guidance and standardised tools, coordinates training and capacity-building, monitors implementation, and ensures the sustainability and quality of guardianship services.

Under Law 5307/2026, every unaccompanied child is placed under guardianship, irrespective of their legal status, including unaccompanied children, separated children and children removed from parental care. The guardianship system is implemented through the following institutional actors: The General Secretary for Vulnerable Persons and Institutional Protection, who appoints guardians and exercises the powers assigned under the law; the Guardian, a legal entity designated as a Guardianship Service Provider and entrusted with the provision of guardianship services; the Guardianship Mandated Person (GMP), a qualified professional authorised by the Guardian to exercise guardianship

duties on behalf of the legal entity and to represent the child in practice; and the Guardianship Council for Unaccompanied Minors, an independent collegial body established under Article 71 of Law 5307/2026, responsible for matters assigned by law, including authorisations in property-related matters, the examination of disputes and serious breaches of guardianship duties, and other functions provided by the legal framework.

To ensure quality assurance, Law 5307/2026 provides for Coordinators who supervise and support the work of the GMPs, monitor the implementation of guardianship services and provide operational guidance to the GMPs.

Since January 2024, guardianship services have been implemented nationwide through a project funded by the Asylum, Migration and Integration Fund (AMIF) 2021–2027. Following an open call for proposals, the project was awarded to a consortium consisting of the NGOs METAdrasi and PRAKSIS. The project provides for the deployment of up to 180 Guardianship Mandated Persons across Greece.

Good practices

The GUARD-UP Good Practices Guide (D2.2) and the National Action Plan for Greece (D2.1) highlight four innovative practices that have strengthened the implementation of the National Guardianship System:

The “Guardianship” Digital Platform, developed by the DIPG in cooperation with the Ministry's General Directorate for Information and Communications and operational since January 2024. The platform enabled the electronic management of guardianship cases, from the appointment of a guardian to the termination of guardianship, providing real-time oversight, standardised case management and evidence-based monitoring. In November 2025, the platform was further upgraded through its integration into the EMPAA (National Registry for the Protection of Unaccompanied Minors), allowing interoperability with other GSVPIP Departments and improved monitoring of the entire case management process.

Greece has developed a national Best Interests Procedures (BIP) framework, including a comprehensive BIP Toolkit, standardised Best Interests Assessment (BIA) tools and a national Training of Trainers programme, implemented in cooperation with UNHCR and EUAA. The programme has created a network of 92 trained trainers who have subsequently delivered secondary trainings to more than 500 professionals working across the child protection system (end of 2025), contributing to consistent and child-centred decision-making nationwide.

The National Emergency Response Mechanism (NERM) was established in 2022 following the abolition of protective custody for unaccompanied children, the NERM provides immediate identification, referral and emergency accommodation for children found in precarious living conditions. Since becoming operational, it has supported the safe emergency accommodation of 7,496 children, including 606 children arriving from Ukraine, through a nationwide referral mechanism comprising a dedicated Tracing Line, Info Desks and Mobile Units.

The Mentorship Project implemented by the GSVPIP with the support of former unaccompanied children serving as mentors, promotes social inclusion, independent living and successful transition to adulthood through peer support, life-skills development and community integration activities.

3.3 Key Challenges/Gaps Identified

Guard UP National Action Plan (D2.1) and Good Practices Guide (D2.2) point to a consistent diagnosis: the legal framework is in place, but implementation gaps reduce timely and consistent protection.

Lack of support during the transition to adulthood

Young adults continue to face demanding challenges in achieving autonomy, including access to employment, housing and continued education. The planned support programmes for young adults, which fall outside the scope of the guardianship system, have yet to be complemented by dedicated mental health, housing and substance use disorder (SUD) treatment and support services, contributing to school dropout and undeclared child labour.

Insufficient support structures for GMPs

GMPs frequently work without Standard Operating Procedures for managing high-risk situations, most notably cases involving minors living in precarious conditions or homelessness. These situations are further complicated by challenges in verifying addresses and claimed family ties, while local social services often lack the capacity to provide adequate support due to chronic understaffing. Interpretation services are more often provided remotely by telephone than through in-person, on-call interpreters, resulting in delays, particularly in managing urgent cases. Training remains inadequate (five days induction training), largely theoretical and criticised by GMPs and coordinators as disconnected from real asylum and legal procedures. Further, reliance on Asylum, Migration and Integration Fund (AMIF) funding, secured only on a fixed timeline, limits multiannual planning and leads to high staff turnover. The maximum ratio of one GMP per 15 minors is becoming increasingly difficult to sustain under the Pact's rapid-appointment requirements. Moreover, the Pact allows for a caseload of up to 30 minors per guardian, placing additional strain on GMPs' capacity to manage such high caseloads effectively.

Limited use of the Complaints Mechanism

The multi-channel complaint mechanism, established under Joint Ministerial Decision 539638/2023, is intended to provide children with an accessible avenue for raising concerns regarding the provision of guardianship services. However, findings from the Focus Group Discussions with GMPs indicate that, although most children are aware of the mechanism, they rarely submit formal complaints. The discussions also revealed that GMPs themselves are not always fully familiar with the complaint procedure.

Institutional fragmentation

On occasion, Child Protection and Care Units and other public institutions and authorities are not fully aware of the role and mandate of the GMP. In other instances, they expect GMPs to perform duties that exceed both their legal responsibilities and their operational capacity. These misunderstandings create additional obstacles to the timely provision of services for children, resulting in delays and increasing the overall workload of GMPs. GMPs are also required to use multiple reporting tools and systems mandated by the GSPs, the GSVPIP, and the AMIF Managing Authority, leading to duplicated reporting and additional administrative burden.

3.4 Policy Recommendations

The following four recommendations translate the challenges and gaps identified above into concrete policy actions for Greece, drawing where relevant on comparative good practice from other GUARD-UP partner countries.

Recommendation 1: Strengthen Transition-to-Adulthood Support

Implementation timeframe: Long-term (2+ years) – requires legislative amendment to extend guardianship-linked support beyond age 18 and sustained multi-annual resourcing of new services.

Policy objective: Develop a coordinated national framework to support unaccompanied young people in their transition to adulthood and beyond the age of 18, ensuring continuity of support and reducing the risk of homelessness, exploitation and social exclusion.

- Introduce a legislative framework allowing continued individual support after the age of 18, through an extended guardianship-related support function or an equivalent transition mentor, for young adults up to at least age 21 who remain vulnerable or face barriers to autonomy.
- Develop integrated transition pathways for young adults linking child protection, education, employment, vocational training, apprenticeships, housing and mental health services, with clear referral mechanisms and responsibilities.
- Incorporate transition planning into Best Interests Assessments and case management from the age of 16 onwards, including individual transition plans with measurable objectives through partnerships with employers and service providers.
- Ensure sustainable national funding for aftercare services, including supported housing, psychosocial support and specialised services for young adults with complex needs.

Recommendation 2: Strengthen the quality, sustainability and operational capacity of the National Guardianship System

Implementation timeframe: Short-term (0–18 months) – highest priority; addresses immediate child-safety and guardian-capacity gaps under current operational pressure.

Policy objective: Strengthen the operational capacity of the National Guardianship System by equipping Guardianship Mandated Persons (GMPs) with the tools, supervision, resources and institutional support necessary to deliver consistent, high-quality guardianship services.

- Adopt national Standard Operating Procedures for complex and high-risk cases, including children in precarious living conditions, homelessness, disappearances, trafficking risks and emergency interventions, building on existing cooperation with the Dutch guardianship organisation Nidos and good practices from Belgium.
- Establish a national professional support framework for GMPs and Coordinators, including mandatory, funded professional supervision, specialised consultation, peer learning, coaching and access to legal and psychological expertise. The framework should also include a national helpdesk and draw on good practices such as Belgium's support programme for independent guardians, implemented by Caritas International Belgium and Red Cross Flanders.

- Reform the national training programme by introducing competency-based learning, mentoring, job-shadowing, continuous professional development through asynchronous online modules and a standing Q&A platform, as well as mandatory refresher training on a quarterly basis.
- Improve operational support through dedicated on-call interpretation services, simplified reporting requirements and digital integration of reporting systems.
- Secure predictable, multiannual funding to ensure the long-term sustainability of the National Guardianship System, improve workforce stability, reduce staff turnover, maintain adequate staffing levels in light of the increased responsibilities introduced by the Pact on Migration and Asylum, and ensure that GMP remuneration adequately reflects the scope of their responsibilities, including travel, interpretation and other operational costs.

Recommendation 3: Promote meaningful child participation and strengthen accountability mechanisms

Implementation timeframe: Medium-term (1–2 years) – builds new participation channels and oversight mechanisms on top of the existing complaints system.

Policy objective: Ensure that unaccompanied children can effectively participate in decisions affecting them and safely raise concerns regarding the quality of guardianship services.

- Increase awareness and accessibility of the national complaint mechanism through systematic information campaigns, regular information sessions for children and GMPs, supported by child-friendly, multilingual written and audio materials, drawing on communication practices such as those implemented by Croatia's Zagreb–Dugave Community Service Centre.
- Complement the existing complaints mechanism with informal and child-friendly feedback channels that enable children to express concerns safely and without fear of negative consequences.
- Strengthen children's participation in the design, monitoring and evaluation of guardianship services through structured consultation mechanisms and youth participation initiatives, such as the Network for Children's Rights' Teens Network.
- Regularly monitor and analyse complaints and children's feedback to inform policy development, quality assurance and continuous improvement of the guardianship system.

Recommendation 4: Improve governance and interinstitutional coordination

Implementation timeframe: Medium-term (1–2 years)

Policy objective: Improve cooperation among institutions involved in child protection and reduce administrative fragmentation affecting the implementation of guardianship.

- Clarify the respective roles and responsibilities of GMPs, accommodation providers, child protection actors, asylum authorities and other competent actors through updated national guidance and joint Standard Operating Procedures.
- Strengthen interagency coordination at national and regional level through regular case coordination mechanisms and joint training.

- Streamline reporting obligations by harmonising reporting requirements across the GSVPIP, Guardianship Service Providers and the AMIF Managing Authority, reducing duplication and administrative burden.
- Continue investing in interoperable digital systems that facilitate information sharing while ensuring compliance with data protection requirements.

3.5 Conclusion

In just over two years, Greece has established a comprehensive legal and institutional framework for the protection of unaccompanied children through the National Guardianship System for Unaccompanied Minors (NGSUM). The adoption of Law 5307/2026 has further strengthened this framework by aligning it with the requirements of the EU Pact on Migration and Asylum, introducing temporary representatives and reinforcing procedural safeguards for children from the earliest stages of arrival.

The GUARD-UP review demonstrates that the key challenge is no longer the establishment of the system, but its consolidation. While legal and institutional architecture is now in place, its long-term effectiveness will depend on continued investment in implementation, including strengthening support structures for Guardianship Mandated Persons, improving interinstitutional coordination, promoting meaningful child participation, and ensuring continuity of support for young people transitioning to adulthood.

The good practices identified through the GUARD-UP project demonstrate that many of these challenges are shared across Europe and that practical, evidence-based solutions already exist. By building on its strong legal foundation and drawing on comparative experience, Greece is well positioned to further consolidate the National Guardianship System and ensure that every unaccompanied child receives timely, high-quality and rights-based protection in accordance with national legislation and European standards.

4. Italy — National Policy Report

4.1 Introduction

The proposed recommendations are based on the findings of the research carried out as part of the project, which involved volunteer guardians, social workers, service professionals and other stakeholders engaged in the protection and inclusion of migrant children and young people. This document adapts the evidence and guidance emerging at transnational level to the Italian context and serves as a working tool for dialogue between institutions, local services, civil society organisations and other actors involved in the guardianship system. In particular, it ties in directly with GUARD-UP's objectives of improving the quality of care, strengthening collaboration between the parties involved and promoting effective support pathways during the delicate transition from childhood to adulthood. The recommendations presented here were also the subject of in-depth analysis and discussion during the transnational co-design workshop organised as part of the project, contributing to the shared definition of concrete strategies and interventions to make protection systems more coherent, inclusive and responsive to the needs of young migrants. In light of the findings, the Italian Government and other stakeholders with responsibilities for the protection of children and young adults are urged to prioritise the identified interventions, recognising that the conditions of vulnerability and specific needs of these young people may persist even after they reach the age of majority and therefore require appropriate and ongoing support measures.

4.2 National Context of the Guardianship System

The current system for the protection of unaccompanied foreign minors in Italy is based on the principle that every minor present on national territory, regardless of citizenship or legal status, must enjoy the same rights and safeguards as Italian minors. As is also evident from document D2.1 'Action Plans in GR-IT-PL-CY-HR-BE' and from current national legislation, Italy has developed a relatively advanced protection model in recent years, based on prioritising the "best interests of the child", ensuring timely access to reception facilities and appointing an independent legal guardian.

The system provides that, upon identification, the child is placed in dedicated initial reception centres, where identification procedures are carried out, needs are assessed and social care support is initiated. Subsequently, the child is transferred to secondary reception facilities, mainly within the Reception and Integration System (SAI) or to authorised educational communities, where they can access education, vocational training, healthcare, psychological support and guidance towards independence. A distinctive feature of the Italian model is the role of the voluntary guardian, introduced by Law No. 47 of 2017, who legally represents the child and supports their journey towards social inclusion, performing functions similar to those carried out by parents or other legal representatives.

The governance of the system involves a range of national and local institutions. The Ministry of Labour and Social Policies plays a central role in monitoring the situation through the National Information System for Unaccompanied Foreign Minors (SIM) and in coordinating activities relating to registration, family reunification and assisted voluntary return. The Ministry of the Interior is responsible for matters relating to reception and international protection, whilst local authorities, through their local social services, ensure the day-to-day care of the minors. The Juvenile Courts are responsible for appointing guardians and for proceedings relating to the protection of minors. An

important role is also played by the Ombudsman for Children and Adolescents, which coordinates the system of voluntary guardians and monitors its implementation. Alongside public institutions, numerous civil society organisations, international bodies and specialist associations operate, providing legal assistance, psychosocial support and advocacy. The legal framework is based primarily on the 1989 United Nations Convention on the Rights of the Child, which has been transposed into Italian law, and on European legislation concerning the reception and protection of migrant children. At national level, the main reference is Law No. 47/2017, known as the 'Zampa Law', considered the first comprehensive European law specifically dedicated to unaccompanied migrant children. This legislation has strengthened the prohibition on refoulement at the border, introduced multidisciplinary procedures for age assessment, provided for the appointment of voluntary guardians, and affirmed the principle of equal treatment between foreign and Italian children. The law complements the Consolidated Law on Immigration (Legislative Decree 286/1998), Legislative Decree 142/2015 on the reception of asylum seekers, and the provisions of civil law concerning the protection of minors. In recent years, the Italian system has undergone significant regulatory and organisational developments. On the one hand, measures have been introduced to strengthen the monitoring of minors through the SIM system and to consolidate the role of volunteer guardians through national training and support programmes. Furthermore, Presidential Decree 231/2023 has come into force, providing a more comprehensive framework for the Ministry of Labour's responsibilities regarding unaccompanied foreign minors (MSNA). On the other hand, the increase in arrivals recorded in recent years has led to the adoption of emergency measures contained in the decree-laws of 2023, which have sparked widespread debate amongst institutions, supervisory authorities and civil society organisations. Some of these provisions have introduced temporary derogations from reception procedures and faster procedures for age assessment in situations where the system is under severe pressure. Whilst maintaining a regulatory framework strongly geared towards the protection of minors, the system therefore continues to face significant challenges relating to reception capacity, the geographical distribution of services, the availability of guardians and the need to ensure effective pathways to inclusion within a constantly evolving migration context.

4.3 Key Challenges/Gaps Identified

Structural and operational challenges. The number of volunteer guardians available remains largely insufficient compared to the number of children in the country: at the end of January 2026, there were almost 16,000 unaccompanied minors in Italy, but there were just over 3,200 active volunteer guardianships – a discrepancy which, according to sector observers, indicates a significant gap between the number of children present and those actually being cared for. Similar data collected previously showed an even more critical situation, with around 4,270 registered guardians compared to over 16,000 unaccompanied minors, a figure deemed insufficient to guarantee individualised and humane support for each child.

Legal and institutional shortcomings. Law 47/2017 whilst having introduced an advanced regulatory framework through the establishment of the voluntary guardian, suffers from inconsistent implementation: as noted by various analysts, the full application of the law remains uneven across the country, with marked differences between regions in the capacity of local guardianship authorities to recruit, train and support guardians. Even the most recent regulatory framework raises concerns: the possibility, provided for in emergency situations, of temporarily placing unaccompanied foreign

minors in centres for adults has been highlighted as a measure that jeopardises their safety and well-being.

Practical difficulties faced by mentors. At an operational level, those considering taking on the role often encounter bureaucratic and information-related obstacles: field-based training experiences have highlighted difficulties in finding clear information on how to apply to become a mentor, particularly in certain regions, and a lack of response from some regional supervisory bodies. At European level, a comparison of national systems has highlighted common challenges such as bureaucratic complexity, a shortage of qualified guardians and difficulties in managing emergency situations.

Barriers to accessing services. The shortage of guardians translates in practice into delays in accessing fundamental rights (residence permits, education, healthcare, integration programmes), particularly in the period leading up to formal appointment. A further critical issue concerns the transition to adulthood: 'care leavers' who leave the care system upon reaching the age of 18 risk losing all points of reference – without valid documents, without a home, without a job – an issue that recent projects such as 'AFFIDO' and 'Tutori in Rete' seek to address by strengthening the local network and ensuring continuity of support.

4.4 Policy Recommendations

The analysis of guardianship practices identified during the project confirms that Italy has an advanced regulatory framework, consolidated by Law 47/2017, but continues to experience significant regional disparities in the implementation of the rights of unaccompanied foreign minors. The main issues concern the availability and quality of specialised services, the functioning of voluntary guardianship, coordination between the stakeholders involved, and the inconsistency of local practices. To address these, an integrated approach is needed that combines regulatory, organisational and operational measures, with a clear definition of time-bound priorities.

1. Policy and legal framework

It is essential to ensure the uniform implementation of existing legislation, so that all unaccompanied foreign minors benefit from the same standards of protection regardless of location. Although Italy has national policy instruments in place – the Guidelines of the Authority for the Protection of Children and Adolescents on voluntary guardians, the Ministry of Labour's Guidelines on unaccompanied minor asylum seekers (MSNA) and the recent Operational Handbook for case management – regional differences persist in the application of protection measures and in access to rights. It is recommended that the monitoring and implementation of Law 47/2017 be strengthened through inter-institutional protocols, common quality indicators and supervision systems that reduce disparities between regions. Cultural mediation should be recognised as a structural component of protection, ensuring access to mediators in all procedures involving the child (meetings with social services, court hearings, administrative procedures). Stable funding mechanisms are also needed for specialist services aimed at the most vulnerable children, particularly in the areas of mental health, psychological support, substance misuse and trauma linked to migration experiences. A crucial priority is the continuity of protection upon reaching the age of majority, a phase of high vulnerability in which unaccompanied foreign minors must simultaneously navigate independent living, entry into the labour market, administrative regularisation and the completion of their studies. The extension of administrative protection, which can be extended up to the age of twenty-one, is essential for a gradual transition to

independence: it is recommended that this be maintained and strengthened, whilst avoiding any regulatory setbacks. Of particular concern are the proposals in the Immigration Bill of March 2026, which provide for a reduction in the maximum duration of administrative continuation to nineteen years, with the risk of prematurely interrupting educational and inclusion pathways and exposing young people who have recently come of age to housing insecurity, social marginalisation and labour exploitation.

Time-sensitive priorities – Short term: monitoring – strengthen monitoring of the implementation of Law 47/2017 and existing national instruments; cultural mediation – systematically incorporate it into procedures for listening to and involving the child; administrative supervision – maintain it until the age of 21 and oppose any attempts to reduce its duration. Medium term: quality standards – define national indicators and minimum standards for protection and care services; data collection – strengthen systems for monitoring the effective implementation of rights; care leavers – define national standards for supporting young migrants as they transition to adulthood. Long term: evaluation – periodically assess the effectiveness of protection policies and measures; national strategy – develop an integrated strategy to promote the independence of young people leaving care.

2. Institutional coordination

Effective care requires close collaboration between judicial authorities, social services, the health system, local authorities, accommodation facilities, children's ombudsmen and civil society organisations; in many areas, such cooperation still depends on local initiatives that are not always structured or replicable. It is recommended that national and regional coordination be strengthened through permanent round-table discussions and the regular exchange of information, developing a comprehensive system for collecting and analysing local practices in order to identify effective models and disseminate shared procedures at national level. A critical issue concerns the procedures for appointing volunteer guardians, the timeliness of which often depends on dedicated staff funded through temporary projects (such as the FAMI programme, in collaboration with the Ombudsman for Children and Adolescents). It is recommended that each Juvenile Court establish a professional post dedicated exclusively to the selection, appointment, coordination and monitoring of voluntary guardians, permanently integrated into the courts' regular organisational structure. This would help to reduce appointment times, improve coordination with regional ombudsmen and ensure greater consistency across the country.

Time-sensitive priorities – Short term: mapping of existing practices at regional and local level; regional roundtables – establishment of coordination roundtables involving the main stakeholders in the system; continuity – ensuring the functions currently supported by temporary projects. Medium term: databases – creation of platforms for sharing best practice; protocols – development of standardised protocols between social services, healthcare and judicial authorities; dedicated role – appointment of a voluntary guardian liaison officer at every Juvenile Court. Long term: national monitoring – institutionalisation of a system for monitoring and evaluating the quality of guardianship; multi-level coordination – consolidation of permanent mechanisms; stable system – development of a coordinated national system for the management of voluntary guardianship.

3. Training and capacity building

The effectiveness of the system depends to a large extent on the skills of practitioners and guardians, which require multidisciplinary knowledge: legal aspects, child protection, intercultural communication and trauma management. It is necessary to invest in initial and continuing training, with modules on children's rights, listening to children, the protection of vulnerable children, intercultural issues and the early identification of special needs, paying particular attention to multiple vulnerabilities linked to mental health, violence suffered during the migration journey and risks of exploitation. Professional supervision and peer review should also be promoted, to share experiences, address common challenges and improve the quality of interventions.

Time-based priorities – Short term: training programmes – review and update of existing programmes; regular updates – courses for tutors and staff. Medium term: mentoring and supervision – introduction of structured systems; specialist modules – on mental health, trauma and complex vulnerabilities. Long term: certification – nationally recognised training programmes; integration – of multidisciplinary training into mainstream professional development systems.

4. Practical support for mentors

Volunteer mentors are central to the Italian model for the protection of unaccompanied minor asylum seekers (MSNA), but their numbers remain insufficient in many areas and the support they receive is often limited. The number of guardians needs to be increased through national and regional awareness-raising campaigns, ensuring they receive ongoing support beyond initial training: dedicated local helpdesks (legal advice, administrative guidance, psychological support, assistance in complex cases) and local networks/communities of practice that reduce isolation and workload. Associations and networks of volunteer guardians, which serve as a point of reference for ongoing training and mutual support, should receive formal institutional recognition and stable, multi-year funding, thereby helping to improve the quality of guardianship and reduce the risk of guardians abandoning their roles. Legal assistance for guardians in more complex procedures – residence permits, family reunification, access to social rights, administrative and judicial proceedings – must also be strengthened by promoting local pro bono legal aid networks involving professional bodies, universities and civil society. A truly effective guardianship system requires the guardian to operate within a multidisciplinary support network, rather than as an isolated figure.

Time-sensitive priorities – Short term: recruitment – information campaigns for new volunteer guardians; networks and advice – strengthening existing networks and legal advice services; local services – enhancing guidance and support for guardians. Medium term: networks between guardians – creation of local networks and support groups; ongoing supervision – implementation of support programmes; institutional recognition – of guardians' associations and the provision of dedicated funding. Long term: national system – stable support for guardians, integrated with local services and coordinated by the relevant institutions; ongoing support – a multidisciplinary system comprising legal advice, mentoring and professional supervision.

5. Cyprus — National Policy Report

5.1 Introduction

This policy report has been developed within the framework of the GUARD-UP – Empowering Guardianship Systems to Improve the Guidance of Unaccompanied Children project. It aims to present the key findings emerging from the national implementation of the project in Cyprus and to translate these findings into practical and evidence-informed policy recommendations for strengthening the national guardianship system for unaccompanied children.

The report builds upon the experiences and knowledge generated throughout the project, including national training, capacity-building activities, stakeholder engagement, and the transnational co-design workshop, where project partners exchanged experiences and identified common challenges and promising practices across participating countries. These collaborative discussions highlighted both shared European priorities and country-specific needs, providing the basis for developing targeted recommendations that respond to the realities of the Cypriot guardianship system.

The recommendations presented in this report are intended to support national authorities and relevant stakeholders in strengthening the quality, consistency, and effectiveness of guardianship for unaccompanied children. They focus on improving institutional coordination, promoting standardized procedures, enhancing professional capacity, and ensuring that guardians are equipped to safeguard the rights and best interests of every unaccompanied child in accordance with national legislation, EU standards, and international child rights obligations.

5.2 National Context of Guardianship System

In Cyprus, the Director of the Social Welfare Services (SWS) serves as the legal guardian of all unaccompanied and separated children (UACs). Guardianship takes effect immediately upon the identification of an unaccompanied child in the Republic of Cyprus, without the need for a formal appointment or court decision. The Law 115/2026 provides that the Director exercises guardianship responsibilities through designated Social Welfare Officers or, where appropriate, through appointed entities, including non-governmental organisations (NGOs). However, in practice, guardianship responsibilities are fully exercised by the SWS officers.

The guardian acts as the child's primary point of reference and advocate throughout the child's stay in Cyprus. Key responsibilities include meeting with the child and maintaining an overview of their needs and circumstances, facilitating access to education, healthcare, legal assistance and other support services, participating in multidisciplinary case meetings, ensuring that the child is informed and heard in decisions affecting them, and coordinating with relevant authorities to safeguard the child's rights and best interests.

Key institutions and actors involved

Key institutional actors include the Social Welfare Services, the Asylum Service, the Deputy Ministry of Migration and International Protection, the Cyprus Police, the Mental Health Services of Cyprus and the Ministry of Education. Civil society organisations, such as “Hope For Children” CRC Policy Center, Caritas Cyprus and the Cyprus Refugee Council, together with international organisations including the International Organization for Migration (IOM) and the United Nations High Commissioner for Refugees (UNHCR), play an important role in supporting the guardianship system. In addition to

providing case management, psychosocial support and other protection services, NGOs often operate shelters and semi-independent living programmes for unaccompanied children under agreement with the competent authority.

Legal and policy framework

The legal framework governing guardianship is primarily established by the Refugee Law 115(I)/2026, which incorporates the provisions of the EU Pact on Migration and Asylum, and the Children's Law (Chapter 352), which constitutes the principal child protection legislation and is currently under amendment. Cyprus has also ratified the United Nations Convention on the Rights of the Child (UNCRC), which forms a cornerstone of the national child protection framework. Additional relevant legislation includes laws addressing the prevention of sexual abuse and exploitation of children (Law 91(I)/2014), juvenile justice (Law 55(I)/2021), domestic violence (Law 119(I)/2000), and the protection of victims of trafficking in human beings (Law 60(I)/2014). The implementation of guardianship is further supported by policy instruments and operational arrangements. These include cooperation protocols between public authorities and NGOs, such as protocols for responding to missing children and cooperation between NGOs and the Cyprus Police, as well as inter-agency referral pathways for the transfer of unaccompanied children from reception centers to appropriate accommodation facilities. Although many of these referral mechanisms are operational rather than formally codified, they facilitate effective coordination among competent authorities and service providers.

Recent developments or reforms

A significant recent reform introduced by the new Refugee Law is the transfer of responsibility for the reception and accommodation of unaccompanied children to the Asylum Service of the Deputy Ministry of Migration and International Protection. While the Asylum Service is now responsible for reception and accommodation facilities, the Social Welfare Services retain responsibility for foster care placements and for the placement of unaccompanied children with suitable adult relatives.

Further developments include the introduction of provisions establishing a maximum number of children that may be assigned to a guardian, with the aim of ensuring the effective exercise of guardianship responsibilities. In addition, the reform established a three-member Complaints Committee, chaired by the Director of the Social Welfare Services (SWS), with the other two members being Social Welfare Services officers who are independent of the child's case. It is expected to strengthen accountability by providing children and relevant stakeholders with a mechanism to raise concerns regarding the exercise of guardianship and the protection of children's rights.

5.3 Key Challenges/Gaps Identified

Despite recent legislative and institutional developments, stakeholder consultations, capacity-building activities and the GUARD-UP transnational co-design process identified several opportunities to further strengthen the implementation of the guardianship system for unaccompanied children in Cyprus. While the existing legal framework provides a strong basis for the protection of unaccompanied children, further operational measures could enhance consistency, coordination, and the overall effectiveness of guardianship practice.

Stakeholders highlighted the value of developing a comprehensive Standard Operating Procedures (SOPs) governing the work of legal guardians. While guardians carry out the same statutory responsibilities nationwide, the introduction of comprehensive SOPs would further support consistency in practice, facilitate professional decision-making and strengthen the overall quality of

guardianship services. The lack of standardized operational guidance can result in inconsistent case management, variable decision-making processes, and unequal levels of support provided to children. The development of SOPs would promote a common approach, improve accountability and ensure that guardianship services are delivered consistently across Cyprus.

Guardians also reported a number of practical challenges affecting their daily work. Many cases involve children who have experienced significant trauma, prolonged uncertainty and multiple forms of loss, which may manifest through challenging or delinquent behaviors. Managing these complex situations requires specialised knowledge, continuous professional development, and access to multidisciplinary support. At the same time, the emotional demands and high level of responsibility associated with guardianship place professionals at increased risk of stress and burnout, particularly where opportunities for clinical supervision and peer support are limited.

Finally, barriers remain ensuring that unaccompanied children can effectively access the services and support available to them. Stakeholders highlighted the need for more comprehensive and systematic needs assessments, alongside improved information sharing regarding available services, referral pathways, and support options. Without clear information and coordinated service mapping, both guardians and children may face difficulties identifying appropriate interventions in a timely manner, potentially affecting children's protection, wellbeing, and integration outcomes.

Overall, these challenges demonstrate that strengthening the guardianship system requires not only legislative reforms but also the development of standardised procedures, improved interagency coordination, enhanced professional support and a stronger child-centred approach to decision-making. These findings provide the basis for the policy recommendations presented in the following section.

5.4 Policy Recommendations

The findings of the GUARD-UP project demonstrate that strengthening the guardianship system in Cyprus requires a combination of legislative, institutional and operational improvements. While recent legal reforms have strengthened the overall framework, further action is required to ensure that guardianship is implemented consistently, that professionals are adequately supported, and that unaccompanied children receive timely, specialised and child-centred services. The following recommendations are based on stakeholder consultations, national capacity-building activities and the transnational co-design process, and are prioritised according to their expected impact and feasibility.

Policy and Legal Framework

The development and implementation of comprehensive Standard Operating Procedures (SOPs) for legal guardians would further strengthen the existing guardianship system by providing a clear and practical framework for the implementation of guardianship responsibilities. These procedures should define guardians' roles and responsibilities, case management processes, documentation requirements, and cooperation with partner institutions. Clear operational guidance would support professional practice, facilitate coordination among relevant stakeholders, and further enhance the quality, consistency and accountability of guardianship services.

Institutional Coordination

Improved coordination between the Social Welfare Services (SWS), the Deputy Ministry of Migration and International Protection, and non-governmental organisations (NGOs) should remain a priority. Although the legal responsibilities of the competent authorities are clearly established, stakeholders highlighted the need for greater clarity regarding operational roles, communication channels and day-to-day case management arrangements, particularly following the recent legislative reforms that redistributed responsibilities for reception, accommodation and guardianship. A formal Responsibilities Allocation Matrix, clearly defining the mandate, responsibilities and decision-making authority of each institution, would significantly strengthen coordination and reduce duplication of efforts. This should be accompanied by standardised referral mechanisms and multidisciplinary case management procedures to ensure that children experience seamless transitions between services and that all relevant actors work towards common protection objectives.

Stakeholders further highlighted the importance of strengthening collaboration with the Ministry of Education to ensure the effective inclusion of unaccompanied children within mainstream education. This includes aligning educational policies with the recent legislative reforms governing guardianship, strengthening language support programmes, introducing structured school induction procedures and promoting anti-discrimination policies that facilitate social inclusion and educational participation.

Training and Capacity Building

Continuous professional development should become a mandatory component of the guardianship system. Although guardians possess considerable expertise, the increasingly complex needs of unaccompanied children require ongoing specialised training tailored to everyday practice.

Priority training areas should include:

- trauma-informed care;
- intercultural communication and cultural sensitivity;
- mental health awareness;
- managing children presenting delinquent behaviour;
- child participation and communication;
- legal developments affecting guardianship practice.

Stakeholders also emphasised the need to establish a network of trained cultural mediators to facilitate communication between children, guardians, and service providers. Cultural mediation can significantly improve trust, reduce misunderstandings, and enhance children's participation in decisions affecting them.

Access to Specialised Services

The availability of specialised services for unaccompanied children should be significantly strengthened. Stakeholders identified important gaps in access to specialised psychiatric assessments, psychological therapy, rehabilitation programmes and interventions for children presenting addiction-related or serious behavioral difficulties.

Developing specialised treatment pathways for these children would strengthen the overall protection system while ensuring that services remain culturally appropriate and responsive to the diverse backgrounds of unaccompanied minors. This should be accompanied by specialised training for

professionals delivering these services to ensure culturally sensitive and trauma-informed interventions.

Practical Support for Guardians

Given the complexity of guardianship work and the emotional demands associated with supporting highly vulnerable children, greater attention should be given to professional wellbeing. Establishing regular clinical supervision and structured peer-support mechanisms would enable guardians to reflect on challenging cases, share good practices, and reduce the risk of professional burnout. While stakeholders considered this a medium-term priority compared to systemic reforms, it remains an important measure for improving staff wellbeing, retention and the quality of guardianship services.

Prioritisation of Recommendation

Priority	Recommendation	Expected Impact
Short-term (Quick Wins)	Develop a Responsibilities Allocation Matrix between SWS, the Deputy Ministry of Migration and NGOs. Establish national referral pathways and multidisciplinary case management procedures. Introduce mandatory specialised training for guardians, with emphasis on trauma-informed practice and mental health.	Improved institutional coordination and clearer responsibilities. Faster and consistent access to services. Increased professional capacity and improved quality of guardianship.
Medium-term (High Priority)	Develop national SOPs for guardianship. Establish cultural mediators to support communication and trust-building. Strengthen educational inclusion through language support, structured school induction and alignment of Ministry of Education policies with the new guardianship legislation. Develop specialised psychiatric, therapeutic and rehabilitation services for children with complex mental health, addiction or behavioural needs.	Standardised practice and enhanced consistency in guardianship practice. Improved engagement and participation of children. Better educational outcomes and social integration. Improved protection and long-term wellbeing.
Long-term	Introduce structured clinical supervision and peer-support systems for guardians.	Reduced burnout, improved staff wellbeing and sustainable professional practice.

6. Belgium — National Policy Report

6.1 Introduction

The Policy Report is intended to inform the relevant actors responsible for the guardianship of unaccompanied children, and it contains the information, knowledge and recommendations collected during the transnational co-design workshop, which was held in Utrecht, 30 June – 1 July 2026. At this workshop, Belgian representatives of guardians and stakeholders of the national care system for unaccompanied children engaged in detailed discussions, both among themselves and with representatives of the other participating project countries, on the current state of the guardianship system and on potential recommendations for its improvement, jointly developing shared priorities and a common policy brief.

Belgium's position as a key destination and transit country within the EU, combined with the structural pressures on its Guardianship Service in recent years, makes timely action particularly important.

6.2 National Context of Guardianship System

Belgium operates one of the most legally structured guardianship systems for unaccompanied minors in the EU. Anchored in federal law since 2002 and administered independently from immigration authorities, the system provides a universal entitlement to guardianship for all UAMs, regardless of legal status. A federal Guardianship Service, a certified guardian training framework and a peer-based coaching program represent the foundation of this system.

Structure alone however does not guarantee quality of support. The research conducted in the framework of the Guard Up project, including interviews, focus group discussions, with both guardians and stakeholders and a systematic literature review, reveals interconnected challenges that limit guardians' capacity to fulfill their mandates effectively. Guardian isolation, the expansion of financial management responsibilities, procedural complexity in family reunification, abrupt termination of support at the age of majority, and jurisdictional and linguistic fragmentation across Belgium's region are among the most consistently identified gaps.

Legal and Institutional Framework

The legal basis for Belgium's guardianship system for UAMs is the Guardianship Act, established under the Programme Law (I) of 24 December 2002 (Article 479, Title XIII, Chapter VI). This legislation provides the foundational mandate: all unaccompanied foreign minors present on Belgian territory or at its borders are entitled to an appointed guardian, irrespective of their legal status or the status of their asylum application.

The system is administered at the federal level by the Guardianship Service, which operates under the Federal Public Service Justice. The Guardianship Service is independent from the Immigration Office. This separation ensures that the Service's mandate is defined solely by the welfare and rights of the child, not by immigration compliance objectives. The Guardianship Service carries six core responsibilities: appointing guardians; identifying UAMs and verifying age where disputed; coordinating with authorities on asylum, residency, reception, and family tracing; ensuring that a durable, child-centred solution is pursued; approving and, where necessary, withdrawing guardian approvals; and providing specialised guardian training.

Belgium's system is assessed here against the seven guardianship standards set out in the Pilot Assessment System (PAS) for Guardianship: non-discrimination, accountability and responsibility, independence and impartiality, child rights-centred practice, child participation, quality assurance, and sustainability and collaboration. The PAS was developed under the EU-funded ProGuard project and is maintained by the European Guardianship Network; its standards operationalise the principles set out in the European Commission and EU Agency for Fundamental Rights' Handbook on Guardianship for Children Deprived of Parental Care (2014/2015).

Guardian types and key actors involved

The Belgian law recognises three categories of guardians, reflecting a flexible design intended to broaden the recruitment pool and encourage civic engagement. Voluntary guardians: limited to a maximum of eight pupils per year and typically combine the role with full-time employment. Self-employed guardians operate independently, either as their primary or supplementary professional activity, and typically oversee between nine and forty unaccompanied children annually. Employee guardians are employed by civil society organisations supporting UAMs, though never contracted directly by FPS Justice.

Before appointment, all guardians must complete a five-day mandatory basic training covering immigration law, juvenile justice, civil law pertaining to asset management, pedagogy and psychology, and intercultural competence and reception. Guardians are required to complete fifteen hours of continuing education each year. Beyond this formal requirement, the Guardianship Service provides: a monthly newsletter with legislative updates and training opportunities; reimbursement for eligible external training; a coaching programme delivered by Red Cross Flanders (for Dutch-speaking guardians) and Caritas International Belgium (for French-speaking guardians); access to an e-learning module on psychosocial support for minors; and a buddy system pairing each independent or voluntary guardian with a designated contact person at the Guardianship Service.

6.3 Key Challenges/Gaps Identified

Relational Challenges: Trust, Communication, and Language

The relationship between the guardians and their pupils is at the heart of the guardianship system. There are, however, several factors that undermine it. In some cases, children who arrive in Belgium have been instructed, either by smugglers, family members, or other actors, to present a particular version of their story in the context of asylum application. This can significantly affect guardian's efforts to build trusting relationships with a child. This dynamic is intensified by the emotional weight carried by minors: family expectations, migration-related trauma, and uncertainty about their legal status can place significant pressure on guardian-child relationships. Guardians are often expected to provide emotional support, manage distress, and build trust, despite limited psychological training and support.

A particularly difficult task reported by guardians is communicating asylum decisions. The Commissioner General for Refugees and Stateless Persons (CGRS), holds exclusive authority over asylum status determinations; guardians have no influence over the outcome, yet must explain and contextualise rejections to both minors and their families. Furthermore, there is a recurring misconception that being a minor automatically entitles them to international protection. Guardians must therefore manage expectations that might have been set incorrectly, while also ensuring that children understand that a rejection does not mean immediate expulsion.

Structural and Procedural Challenges: Reunification, Jurisdiction, and Politics

Family reunification emerged as the most complex single challenge, raised consistently both in our interviews with guardians and stakeholders and in discussions with participants at the Utrecht workshop. The procedure is resource-intensive and includes multiple actors, each operating under different mandates, timelines, and capacity constraints. Housing shortage means that children waiting for reunification are frequently placed in large-scale reception facilities that are not suitable for vulnerable minors and that actively delay reunification by providing no family-oriented alternatives.

Jurisdictional complexity adds structural fragmentation. Belgium's decentralised federal architecture means that laws, procedures, and available services differ between regions. Guardians working across regional boundaries must navigate this patchwork independently, and in some cases responsibility for a minor is passed between jurisdictions, creating delays and gaps in service provision. Beyond regional differences, the evolving political landscape affects access to psychological support and language assistance.

Role expansion without adequate support: Finance and Transition to adulthood

Two developments have expanded guardians' responsibilities without a corresponding increase in trainings or support: the introduction of financial management duties in 2019, and the absence of a structured framework to support minor's transition to adulthood. Nevertheless, at the time of project implementation both of these topical trainings have been scheduled to take place in Belgium, thereby already addressing the outlined gaps. Guardians reported that assuming responsibility for minors' financial management has fundamentally altered their role, shifting from a supportive relationship towards a more financial intermediary function. This framing captures the tensions between administrative responsibility and the relational foundation on which effective guardianship depends. The 2022 budget cuts, which reduced state financial support to unaccompanied children arriving in Belgium by two thirds, sharpened these tensions. As a result, guardians were managing substantially reduced resources without warning, while also managing expectations of minors and their families that were built around the previous levels of support.

Transition to adulthood represents the most acute vulnerability in the system. At the age of eighteen, guardianship ends, with repercussions for housing, reception, and legal status. Young adults who have spent years navigating migration and asylum procedures are abruptly required to assume full independence, frequently without preparation and without structured support. The heightened risks of trafficking, exploitation and homelessness are well documented by civil society organisations in Belgium.

Isolation and emotional burnout

Despite Belgium's investment in coaching and peer support structures, many independent guardians describe their work as characterised by isolation. The buddy system, while valued in principle, is subject to turnover that can leave guardians paired with contacts less experienced than themselves. The peer exchange meetings, recently revived by the Guardianship system, are welcomed. However, guardians report that the frequency of these meetings is insufficient to adequately address the voluntary and independent guardians' needs for consistent communal connection and peer exchange. The emotional demands of the role, including managing trauma, communicating difficult news, navigating complex bureaucracies, and building relationships with structural constraints, remain inadequately addressed in training. The perception among guardians persists that mental health support and self-care are underdeveloped relative to the demands of the role.

6.4 Policy Recommendations

The findings point to a guardianship system with a strong structural foundation, but with important gaps in consistency, coordination, capacity, and support. The recommendations below translate these findings into concrete measures across four interconnected areas: policy and legal framework; institutional coordination and system consistency; training, capacity and professional support; and practical support for guardians and minors.

The recommendations are prioritised according to their expected timeframe. Short-term measures can largely be implemented within existing structures and resources, while medium- and long-term measures require stronger inter-institutional coordination, additional resources and, where necessary, legislative or policy reform.

1. Policy and Legal Framework

Medium term – Formalise transition to adulthood within the guardianship framework. The transition to adulthood should be recognised as a distinct phase requiring structured preparation rather than an abrupt end point at 18. The federal government, together with the Guardianship Service and relevant regional authorities, should establish a framework setting out clear pathways to housing, legal guidance, social and psychological support, education and employment, as well as continuity of trusted relationships where appropriate. This should clarify young people's entitlements and responsibilities before and after majority and reduce reliance on individual initiative or the availability of services.

Medium term – Review the financial management responsibilities of guardians. The expansion of guardians' financial management responsibilities, together with changes in financial support available to unaccompanied minors, should be formally assessed. The review should examine the implications for guardians' workload, training needs, remuneration and relationships with minors, and consider whether the current allocation of financial responsibilities remains appropriate within the guardianship role. Its findings should inform any future revision of the guardianship framework.

2. Institutional Coordination and System Consistency

Short term – Strengthen coordination across regional and institutional competences. The Guardianship Service should establish mandatory coordination mechanisms and clear, standardised procedures for cases involving different regional competences or jurisdictions. This should include defined points of contact, referral pathways and responsibilities across relevant authorities and services. Greater procedural consistency would reduce the delays, uncertainty and gaps in support that arise when guardians must navigate Belgium's fragmented regional and institutional landscape.

Short term – Strengthen peer exchange and professional support. The frequency of peer-exchange opportunities should be increased, building on existing mechanisms facilitated by coaching organisations. Shorter, more frequent sessions focused on current challenges would provide a more reliable source of professional support, particularly for independent guardians, and strengthen the buddy system as a complement to formal coaching.

Medium term – Establish systematic cross-language exchange of effective practice. The Guardianship Service should establish a mechanism for identifying effective training content, tools and practices developed within one language community and facilitating their adaptation for the other. Existing

communication channels, including the Guardianship Service newsletter, could be used to disseminate adapted resources and allow guardians to identify practices that would benefit from wider application.

3. Training, Capacity and Professional Support

Short term – Strengthen and systematise continuing professional development. The existing requirement of 15 hours of annual continuing education should be maintained as a minimum standard and supported through coordinated provision and communication by the Guardianship Service and coaching organisations. Training should reflect the evolving complexity of guardianship and cover legal and administrative competencies alongside intercultural competence, communication, safeguarding, financial management and the relational dimensions of the role.

Short term – Address the emotional demands of guardianship through training and professional support. A dedicated proportion of continuing education should focus on psychological self-care, emotional resilience, peer support and managing the relational demands of guardianship. This should be complemented by access to professional support for guardians managing particularly complex or emotionally demanding cases. Together, these measures would address the gap between the emotional demands of the role and the support currently available to guardians.

4. Practical Support for Guardians and Minors

Short term – Strengthen specialised placement capacity for vulnerable minors. Relevant authorities should address gaps in specialised reception and accommodation for minors with complex protection, psychological or other support needs. Clear referral pathways and sufficient specialised capacity are essential to ensure that guardians can secure placements appropriate to individual needs and are able to exercise their responsibilities effectively.

Medium term – Embed structured preparation for financial independence and adulthood. Financial literacy and preparation for independence should become a standard part of transition planning, beginning no later than one year before a minor reaches majority. This should include guided budgeting, information on the management of bank accounts at 18, and signposting to post-majority financial support. The transition toolkit developed by the Red Cross within the Guardian Xchange project, in collaboration with the project consortium partners, should be incorporated into guardians' basic training and promoted as a practical resource for preparing minors for financial independence and adulthood.

Medium to long term – Review guardians' workload, remuneration and working conditions. The federal government and Guardianship Service should jointly review guardians' caseloads, remuneration, administrative burden, and access to professional support. The expansion of responsibilities, including financial management, complex case coordination and preparation for adulthood should be matched by adequate time, resources and compensation. Ensuring that guardians have the capacity to provide consistent and meaningful support is fundamental to the quality of the guardian–child relationship.

The recommendations are mutually reinforcing and should be implemented as part of a coherent approach to strengthening guardianship. In particular, adequate workload and remuneration, sufficient specialised placement capacity and effective coordination across institutional and regional competences are enabling conditions for the system as a whole.

The recommendations do not require a fundamental redesign of Belgium's guardianship system. Rather, they seek to formalise effective practice, strengthen consistency across regions and language communities, ensure that expanded responsibilities are adequately resourced, and address the system's key pressure points: jurisdictional fragmentation, professional isolation, the emotional demands of guardianship, financial management, unsuitable placements and the transition to adulthood. Addressing these areas would strengthen the consistency and quality of guardianship in practice and provide a stronger basis for Belgium to contribute to effective guardianship standards at EU level.

7. Poland — National Policy Report

7.1 Introduction

This policy paper constitutes Deliverable D4.4 of the GUARD-UP project. Its purpose is to identify the key challenges affecting the guardianship system for unaccompanied migrant children (UAM) in Poland and to propose practical policy recommendations aimed at strengthening the system and improving the protection of children's rights. The paper was developed throughout the implementation of the project and in particular, during the transnational workshop held on 30 June and 1 July in Utrecht, the Netherlands, facilitated by NIDOS.

The policy paper is structured into four main parts. The first section outlines the current national context of the Polish guardianship system for unaccompanied migrant children. As the analysis demonstrates, it is difficult to describe the Polish model as a coherent guardianship system due to the large number of institutions involved, overlapping competences and the absence of a single authority responsible for coordinating guardianship across different legal proceedings. The second part provides a detailed overview of the institutional framework, the third section presents the key challenges identified throughout the project. Building on these findings, the final section sets out a series of concrete policy recommendations addressing each of the identified gaps. This policy paper seeks not only to identify existing challenges but also to provide a practical roadmap for strengthening the guardianship system and ensuring a more coherent, child-centered approach to the protection of unaccompanied migrant children in Poland.

7.2 National Context of Guardianship System

Current guardianship system for unaccompanied children

The Polish guardianship system for unaccompanied migrant children is characterized by a fragmented distribution of responsibilities rather than a single, comprehensive guardianship model. Responsibilities related to legal representation, day-to-day care, and safeguarding the child's best interests are divided among different actors and vary depending on the child's migration status and the legal procedure involved.

For most unaccompanied migrant children, legal representation is limited to specific administrative or judicial proceedings, such as asylum, return, or residence permit procedures. Daily care is provided separately through the foster care system. As a result, no single person is responsible for ensuring the child's overall well-being and representation across all aspects of their life. The only exception is the system introduced for unaccompanied children from Ukraine under the 2022 Special Act. Temporary guardians appointed under this legislation combine legal representation with day-to-day care and are authorized to act on behalf of the child in judicial, administrative, and everyday matters.

Key institutions and actors

There is no central guardianship authority in Poland. Responsibility for appointing guardians or legal representatives lies with the competent family courts. The system involves several institutions and professionals, each exercising a different scope of responsibilities. Key actors include: family Courts, guardians (kuratorzy), legal representatives, temporary guardians, foster parents and residential care institutions, public authorities responsible for asylum, migration, social assistance, and child

protection. This multi-actor model requires effective coordination and communication among institutions in order to ensure continuity of support and safeguard the best interests of the child.

Legal and policy framework

The legal framework governing unaccompanied migrant children in Poland is dispersed across several legislative acts rather than regulated through one comprehensive guardianship law. The main legal instruments include: the Act on Granting Protection to Aliens (2003); the Aliens Act (2013); the Family and Guardianship Code (1964); the Family Support and Foster Care System Act (2011); the Act on Assistance to Ukrainian Citizens in Connection with the Armed Conflict in Ukraine (2022); the Law on Proceedings Before Administrative Courts (2002). In addition, Poland is a State Party to the UN Convention on the Rights of the Child, which provides the overarching framework for the protection of children's rights.

Recent developments or reforms

A significant legislative change was introduced in January 2026 through an amendment to the Act on Granting Protection to Aliens. Under the amended provisions, unaccompanied minors aged 15 years and older may now be placed in detention even if they have applied for international protection. This represents a substantial departure from the previous legal framework, under which an application for international protection constituted a ground precluding the detention of unaccompanied children.

7.3 Key Challenges/Gaps Identified

Although Poland has established legal mechanisms for the protection and representation of unaccompanied migrant children, the current system faces significant structural and operational challenges that affect both the quality of guardianship and children's effective access to protection and services.

Fragmented system of legal representation

The most significant challenge is the absence of a comprehensive guardianship model. Instead of one person being responsible for safeguarding the child's best interests throughout all stages of their stay in Poland, legal representation is fragmented across different administrative and judicial procedures. Separate representatives may be appointed for asylum proceedings, return procedures, detention-related cases, or residence permit applications, while day-to-day care is provided independently through the foster care system. This fragmentation leads to diluted responsibility, weak coordination between professionals, and uncertainty regarding who is ultimately responsible for safeguarding the child's overall well-being and best interests. The lack of a unified legal framework also creates inconsistencies in court practice, with different courts applying different approaches to the appointment and scope of legal representatives.

Limited capacity and insufficient support for guardians

The effectiveness of the system is further limited by the shortage of qualified guardians and legal representatives. In practice, guardians are often NGOs staff members or attorneys who may have strong legal expertise but limited preparation for working with vulnerable children. Oftentimes, professionals with experience in child protection frequently lack specialized knowledge of migration and asylum law. There are currently no mandatory qualification requirements, national training programmes, supervision mechanisms, or systematic professional support for guardians working with unaccompanied migrant children. Guardians also face practical barriers, including limited access to

interpreters, insufficient financial resources to travel and meet children regularly, and a lack of psychological support or opportunities for peer exchange.

Challenges within the foster care system

The broader crisis affecting the Polish foster care system has a direct impact on unaccompanied migrant children. The shortage of foster families and available places in residential care facilities often delays children's placement in appropriate care settings and, in some cases, contributes to prolonged stays in detention or temporary arrangements that lack a clear legal basis. Foster care institutions accepting migrant children frequently receive no additional financial or organizational support. Staff often lack access to specialized training, language assistance, intercultural mediation, and structured cooperation with legal representatives, making it difficult to adequately respond to children's complex needs.

Delays and barriers affecting children's access to protection

Although legislation provides for the prompt appointment of guardians, court proceedings often take considerably longer than the statutory deadlines. Until a guardian is appointed, children may remain unable to formally apply for international protection or fully access essential services such as education, healthcare, and social assistance. Additional challenges include the limited methodology used for age assessment, which relies primarily on wrist X-rays despite recognized concerns regarding accuracy, and the high number of children leaving care shortly after arrival in Poland. Delays in procedures, fragmented support, and uncertainty regarding legal status increase the risk of children disappearing from the protection system before their cases can be properly addressed.

7.4 Policy Recommendations

Recommendations for policy and legal framework

Introducing the institution of guardian. To address the fragmented guardianship system and the absence of a clearly defined guardian for migration-related procedures, we recommend introducing a new institution of guardian. From our experience, children often interact with numerous institutions and professionals, including courts, social welfare authorities, foster care institutions, border guards, asylum authorities and legal representatives. As a result, many children experience confusion regarding the role and responsibilities of each actor and frequently lack a single trusted adult. We recommend that the Ministry of Justice, with cooperation with the Ministry of Family, Labour and Social Policy prepare the amendment to the Aliens Act introducing the institution of guardian for every unaccompanied migrant child present on Polish territory, regardless of their legal status. The new regulations should govern the scope of a guardian's duties, the process of appointing them, and, in particular, emphasize their responsibility for the child's legal situation, regardless of the proceedings underway. The institution should ensure that the guardian's primary responsibility is to safeguard the best interests of the child and work on durable solutions. Such a model would reduce institutional fragmentation while significantly strengthening continuity of care. The reform should be accompanied by an increase in guardians' remuneration, who will need to demonstrate more comprehensive knowledge. Implementation timeframe: medium/long term.

Introduce multidisciplinary age assessment procedures. Our second recommendation is based on the observation that age assessment in Poland relies predominantly on wrist X-rays, despite well-documented scientific concerns regarding the accuracy and reliability of this method. Such an approach may lead to children being incorrectly assessed as adults, potentially depriving them of

safeguards specifically designed to protect minors. We therefore recommend replacing the current practice with multidisciplinary age assessment procedures in accordance with the EU pact on migration. We refer to the already existing solution introduced in the Asylum Procedure Regulation which underlines that in all cases, age assessments should be carried out in a manner that gives primary consideration to the best interests of the child throughout the procedure and methods and conditions of the assessment must prioritize the presumed child's rights, dignity and well-being. Whenever uncertainty remains, the benefit of the doubt should be given to the individual claiming to be a child. As these rules are already directly applicable under EU law, implementation would primarily require the Ministry of the Interior and Administration to develop practical guidelines for the Border Guard, which is responsible for carrying out most age assessments. Implementation timeframe: short term.

Recommendation for institutional coordination: Establish a permanent inter-agency working group

As described above, Poland lacks a single authority responsible for coordinating the guardianship system for unaccompanied migrant children. While introducing a unified guardianship institution will require legislative reform and may take time, an interim solution would be to establish a permanent inter-agency working group. We recommend that the Ministry of Family, Labour and Social Policy lead this group, bringing together representatives of the Ministry of Justice, the Ministry of the Interior and Administration, the Border Guard, foster care coordinators and other relevant stakeholders. The working group should meet quarterly to develop common standards, improve data collection, coordinate policies and address emerging challenges. It should also maintain regular dialogue with non-governmental organizations working directly with unaccompanied migrant children, whose practical experience can help identify protection gaps and inform policy development. In addition, the group could establish and maintain a central register of qualified guardian candidates to facilitate appointments by family courts and improve consistency across the country. Implementation timeframe: short term.

Recommendation for training and capacity building: Develop a comprehensive national training platform

Throughout the project we consulted numerous professionals working directly with unaccompanied migrant children who consistently highlighted lack of a comprehensive source of training. Knowledge is currently dispersed across different institutions, while many professionals encounter unaccompanied children only occasionally and therefore have limited experience in migration-specific child protection issues. Thus, we recommend that the inter-agency working group or Ministry of Family, Labour and Social Policy develop an online platform with a comprehensive training programme for all professionals involved in working with UAM. This should standardise the approach to working with children and provide support for those who are in contact with UAM. The platform should include modules covering children's rights, migration procedures, guardianship, trauma-informed approaches, intercultural communication, age assessment, best interests determination and effective inter-agency cooperation. It should also contain practical guidance, case studies, legal updates and downloadable materials that professionals could use in their daily work. We recommend that ministries develop this tool in cooperation with non-governmental organizations already involved in training the guardians. Implementation timeframe: medium term.

Recommendation for practical support for guardians: Introduce periodic cross-agency case reviews and increase remuneration

Since establishing a unified guardianship system will require legislative reform and is therefore likely to take time, an interim coordination mechanism should be introduced. We recommend establishing mandatory periodic cross-agency case reviews for every unaccompanied migrant child. These meetings should bring together the professionals involved in the child's case to exchange information, clarify responsibilities and support best interests assessments. Although similar reviews are already used within the foster care system, they should become standard practice for all unaccompanied migrant children, taking into account their specific vulnerabilities. Regular information exchange would reduce duplication of work, minimise the need for children to repeatedly recount traumatic experiences, and improve the consistency of decisions by ensuring that all relevant actors have access to up-to-date information, including the child's legal and residence status. As this measure requires changes in practice rather than legislative amendments, the Ministry of Family, Labour and Social Policy could introduce it through national guidance.

Another important practical issue concerns the remuneration of guardians appointed within the current system. There is an urgent need to increase the level of remuneration so that it adequately reflects the scope of responsibilities, the complexity of the role and the time required to effectively represent and support an unaccompanied migrant child. Adequate remuneration is essential not only to recognise the importance of the guardian's function but also to ensure that suitably qualified professionals are willing to undertake and continue performing this role. At present, the remuneration received by guardians does not cover a number of necessary expenses incurred in the course of carrying out their duties, including travel costs and interpretation or translation services. Consequently, guardians who seek to fulfil their responsibilities diligently may be required to cover these costs from their own financial resources. We therefore recommend introducing a reimbursement mechanism for expenses necessarily incurred by guardians in the performance of their duties. Implementation timeframe: short/medium term.

8. Consolidated Policy Recommendations at EU Level

The six national reports produced under the GUARD-UP project — covering Belgium, Croatia, Cyprus, Greece, Italy and Poland — describe guardianship systems that differ considerably in legal architecture, institutional design and levels of maturity. Yet, taken together, they reveal a striking convergence of structural challenges: uneven implementation of otherwise sound legal frameworks, insufficient coordination between the many authorities involved in a child's case, guardian shortages and unsustainable caseloads, uneven access to training and psychosocial support, fragile arrangements for the transition to adulthood, and limited mechanisms for children's participation and complaint. These shared findings point to the need for coordinated action at EU level, complementing national reforms rather than replacing them.

1. Translate common standards into binding operational guidance

While most Member States possess an adequate legislative basis for guardianship, implementation on the ground remains inconsistent, both between and within countries. The EU should support Member States in converting existing guidance — protocols, handbooks and good-practice guides — into binding Standard Operating Procedures covering appointment timelines, caseload ceilings, case-management standards and documentation requirements, building on the PAS Guardianship Standards and the EU Pact's requirements on prompt appointment and multidisciplinary age assessment.

2. Strengthen cross-institutional coordination and interoperable data systems

Guardianship intersects with asylum, child protection, education, health and law-enforcement authorities, and fragmentation between them is a near-universal source of delay and inconsistency. The EU should encourage the establishment of formal coordination mechanisms — responsibility-allocation matrices, permanent inter-agency working groups and multidisciplinary case-review procedures — supported by interoperable, GDPR-compliant data systems that allow a child's case to be tracked reliably across services and, where relevant, across borders.

3. Ensure sufficient, sustainably resourced guardians

Nearly every report identifies a shortfall between the number of children requiring guardianship and the number of guardians actually available, compounded by unsustainable caseloads, inadequate remuneration and reliance on short-term project funding. EU-level guidance and funding instruments should support Member States in securing multiannual financing for guardianship services, setting realistic caseload ceilings consistent with the Pact and ensuring that remuneration reflects the complexity of the role and covers costs such as travel and interpretation.

4. Make continuous, competency-based training a shared minimum standard

Reports consistently call for training that goes beyond a short induction course to cover trauma-informed care, intercultural communication, child participation, financial management and legal developments, delivered on an ongoing basis rather than once. The EU should promote a shared training baseline while leaving Member States flexibility in delivery.

5. Institutionalise professional support and safeguard guardian wellbeing

Guardians across all six countries report isolation, emotional strain and burnout, with clinical supervision and peer support available inconsistently, if at all. EU-level guidance should recognise structured supervision, peer exchange and access to psychological support as core components of a functioning guardianship system, not optional extras.

6. Build structured pathways for the transition to adulthood

The abrupt end of guardianship at eighteen is repeatedly identified as the point of highest vulnerability, exposing young people to homelessness, exploitation and loss of legal status. The EU should encourage Member States to extend individualised support — housing, education, employment and legal guidance — beyond the age of majority, in line with the European Child Guarantee's emphasis on continuity of support for children in vulnerable situations.

7. Guarantee timely access to specialised services

Children frequently face delays in accessing education, healthcare, psychosocial and mental-health support pending appointment of a guardian or due to fragmented referral pathways. EU-level standards should reinforce immediate, guardian-independent access to essential services from the moment a child is identified, alongside investment in cultural mediation and interpretation as structural, not ad hoc, components of protection.

8. Strengthen child participation and accountability

Complaint mechanisms exist in several Member States but remain underused, and children's involvement in decisions affecting them is inconsistent. The EU should promote accessible, child-friendly complaint and feedback channels and support Member States in embedding children's views systematically into case management and system-level monitoring.

Coordinated EU action is essential precisely because unaccompanied children move across, and are protected within, systems that do not stop at national borders. Divergent standards of guardianship expose children to inconsistent protection depending on where they are identified, undermine the coherence of the Common European Asylum System, and place uneven burdens on national systems facing similar structural pressures. By consolidating the evidence gathered through GUARD-UP into shared EU-level priorities, Member States, EU institutions and civil-society partners can ensure that every unaccompanied child in Europe — regardless of the country in which they arrive — benefits from guardianship that is timely, competent, consistent and genuinely centred on their best interests.