



Convention on the Rights of the Child

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Committee on the Rights of the Child

Inquiry concerning France conducted under article 13 of the Optional Protocol to the Convention on the Rights of the Child on a communications procedure

Observations of France*

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* The present document is being issued without formal editing.



Observations of France in response to the confidential report of the Committee on the Rights of the Child on violations of the rights of unaccompanied children (CRC/C/FRA/IR/R.1)

1. In a letter dated 18 March 2025, the Office of the United Nations High Commissioner for Human Rights requested France to submit its observations within six months in response to the report on the inquiry conducted under article 13 of the Optional Protocol to the Convention on the Rights of the Child on a communications procedure in respect of violations of the rights of unaccompanied children, and following a field visit by two members of the Committee on the Rights of the Child from 16 to 20 October 2023.

2. The Government of France has the honour to submit the following observations to the Committee on the Rights of the Child:

3. It should be noted at the outset that, since the visit by the Committee on the Rights of the Child, France has continued its efforts to implement the Child Protection Act of February 2022:

- An implementing decree, No. 2023-1240 of 22 December 2023, modifying the arrangements for the accommodation and assessment of persons claiming to be minors and deprived of family protection and the procedures for the payment of the lump-sum State contribution towards the expenses incurred by departments for the assessment of such persons was published in the Official Gazette (*Journal officiel*) on 24 December 2023. It amended articles R. 211-11 and R. 211-12 of the Social Welfare and Family Code.
- Decree No. 2023-1253 of 26 December 2023 on arrangements for the distribution of minors temporarily or permanently deprived of family protection was published in the Official Gazette on 27 December 2023.
- The order of 1 February 2024 issued pursuant to article R. 221-13 of the Social Welfare and Family Code and amending the order of 28 June 2016 was published in the Official Gazette on 4 February 2024.
- The 2023–2027 national strategic plan of the Directorate for Youth Protection and Juvenile Justice has the aim of “ensuring strengthened and coordinated support for prioritized and particularly vulnerable groups” such as unaccompanied migrant children.

A. Information relating to paragraph 92 (a)

4. The Child Protection Act (No. 2022-140) of 7 February 2022 strengthened the legal framework for the accommodation, assessment and care of children.

5. France guarantees the unconditional reception and accommodation of unaccompanied migrant children throughout the country. Pursuant to the Child Protection Act (No. 2022-140) of 7 February 2022, any person claiming to be a minor and temporarily or permanently deprived of the protection of his or her family is accorded unconditional reception and care during the period of temporary emergency accommodation by the child welfare services under the jurisdiction of the departmental councils.

6. This same authority is therefore responsible for providing shelter and assessing minor age and unaccompanied status (art. L. 221-2-4 of the Social Welfare and Family Code).

7. As part of its functions, the department must organize accommodation to guarantee such unconditional reception. Structures providing accommodation to persons claiming to be unaccompanied migrant children are social establishments (art. L. 312-1 (I) (1) of the Social Welfare and Family Code) subject to the regulations applicable to social and medico-social establishments and services, particularly in terms of users’ rights (arts. L. 311-3 et seq. of the Social Welfare and Family Code), authorization, oversight and rate-setting by the President of the departmental council (arts. L. 313-3 et seq. of the Social Welfare and Family Code).

8. The uniform application throughout the country of methods for assessing minor age and unaccompanied status is guaranteed by the fact that they are governed by national law. Once the respite period has elapsed, the legal duration of the assessment during the period of temporary emergency accommodation is set at five days, which may be extended twice. Throughout the assessment period, the person is given shelter to ensure protection and initial social support. The assessment of minor age and unaccompanied status is organized according to the procedures specified in national standards set by decree. These standards are spelled out in a national guide to best practices drawn up in consultation with the departments, to ensure that practices are harmonized across the country. The guide, which has been widely distributed, is being effectively put into practice by local actors, as shown by the work carried out in 2024 by the national task force on the care of unaccompanied migrant children.

9. As part of the application of uniform principles throughout the country, once minor age and unaccompanied status have been recognized, the young person is entrusted to the child welfare services and enjoys all the rights to which protected children are entitled, the framework for which was strengthened by the Act of 7 February 2022: prohibition of hotel accommodation; provision of personalized support, including the possibility of sponsorship and mentoring, if this is in the best interests of the protected minor; and definition of a risk management policy to ensure safe care in child protection establishments and facilities. As in the case of young people leaving the system of child welfare services, unaccompanied migrant children are entitled to receive support until they reach the age of 21, in the absence of an obligation to leave the country.

10. The law requires all French departments to take specific support measures for young adults: the right to a coming-of-age interview as soon as possible for young persons taken into care after the age of 17, support in obtaining a residence permit when they reach the age of majority, support in applying for asylum, where applicable, and the right to a temporary “private and family life” residence permit for unaccompanied migrant children who are taken into care before the age of 16 and who meet the eligibility requirements.

11. A department that fails to carry out the child protection functions assigned to it by the legislature may be sanctioned by an administrative court, including by means of interim relief proceedings.

12. Over and above the guarantees provided by the existence of a legal framework defined at the national level, State services are attentive to specific situations and difficulties encountered by the departments. They are mobilized to support the departments in the discharge of their duty to promote the reception and accommodation of all persons claiming to be unaccompanied minors in the country (such as support in dialogue with local elected officials for the establishment of new care facilities or, in emergency situations, the requisitioning of facilities to provide shelter) and to remind them of the legislative and regulatory provisions and obligations incumbent on the departments in this regard under the aforementioned Act of 7 February 2022.

13. When resources are strained, and to support the department, some prefectures use their power to requisition accommodation facilities to house people claiming to be unaccompanied migrant children, to alleviate overcrowding in existing facilities (art. L. 2215-1 of the General Code for Local Authorities). Such requisitioning has been carried out in Paris, where the police prefect requisitioned a gymnasium, and in Alpes-Maritimes, where the prefect requisitioned an apartment hotel.

14. The year 2023, the year of the Committee’s visit, was marked by a sharp increase in the number of unaccompanied minors entrusted to child welfare services by court order and in the number of persons claiming to be unaccompanied migrant children, leading to the overcrowding of reception facilities. The difficulty of caring for these minors is part of a wider context of strains in the child protection system resulting from a steady increase in the number of placement measures and challenges in attracting enough workers to social sector jobs, including in the field of child protection.

15. In view of these concrete difficulties, a national campaign to guarantee the effectiveness of the Child Protection Act throughout the country was launched in 2024. Working groups were set up in seven priority areas, including one on the care of unaccompanied migrant children. That working group found that the departments were

implementing the guide to best practices for assessing minor age and unaccompanied status, which was prepared with the aim of promoting harmonization across the country.

16. The Government's new strategy for overhauling and standardizing practices and care services will be based on strengthened cooperation between the departments and the various ministries concerned. To this end, in late April 2025 a funders' committee was set up as a forum for dialogue to support the roll-out of the changes in the child protection framework. In parallel, national governance of the framework will be introduced, mobilizing the various ministries involved in child protection policy in conjunction with representatives of departments, and local governance will be implemented through the establishment of departmental child protection committees. Such committees, which are currently being piloted in 10 departments, bring together State services at the departmental level, departmental services, representatives of the judicial authorities and child protection professionals, as well as facility managers. Their role is to ensure local coordination of public policies implemented in the departments in the field of child protection.

B. Information relating to paragraph 92 (b)

17. France considers that the best interests of the child must be a primary consideration in all actions concerning children, in accordance with article 3 (1) and (2) of the Convention on the Rights of the Child. In the context of the age determination procedure for unaccompanied foreign nationals claiming to be minors, this obligation entails a presumption of minor age (art. 388 of the Civil Code).

18. During the assessment procedure, the person must be given the benefit of the doubt and be treated as a child (Committee on the Rights of the Child, Views of 25 January 2023 concerning communication No. 130/2020 (CRC/C/92/D/130/2020), *S.E.M.A v. France*, para. 10 (e)). The European Court of Human Rights has held that: (i) the principle of presumption of minor age is an inherent element of the protection of the right to respect for privacy of an unaccompanied foreign national claiming to be a minor; (ii) while the national authorities' assessment of a person's age might be a necessary step in the event of doubt as to his or her minor age, the principle of the presumption of minor age implies that sufficient procedural guarantees must accompany the assessment procedure (*Darboe and Camara v. Italy*, No. 5797/17, 21 July 2022, paras. 153 and 154).

19. The provisions of French domestic law provide sufficient guarantees in this regard. Article L. 221-2-4 of the Social Welfare and Family Code provides that the departmental council "shall decide on the person's minor age and unaccompanied status on the basis of interviews conducted with the person, information transmitted by the representative of the State in the department and any other element that may shed light on the matter. A person claiming to be a minor and temporarily or permanently deprived of the protection of his or her family cannot be presumed to have reached the age of majority solely on the basis of a refusal to have fingerprints taken or the mere fact that he or she is already registered in the automated processing system referred to in the present paragraph II or in the automated processing system referred to in article L. 142-1 of the Code on the Entry and Stay of Aliens and the Right to Asylum."

20. Article 2 of the order of 20 November 2019 issued pursuant to article R. 221-11 of the Social Welfare and Family Code on the assessment of persons claiming to be minors and temporarily or permanently deprived of family protection thus specifies that the assessment must be based on a body of evidence that may include:

- Information provided to the President of the departmental council by the representative of the State in the department, in accordance with the procedures set out in article R. 221-11 of the Social Welfare and Family Code and specified in article 3 of the order, to help determine the person's identity and situation, as part of the information contained in the "minor age assessment support" automated personal data processing system, and the elements used to verify the authenticity of the identification documents presented by the person.

- A social assessment based on interviews conducted in accordance with the procedures specified in articles 4 to 9 of the above-mentioned order.
- The additional examinations provided for in article 388 of the Civil Code, in accordance with the conditions and procedure specified in that article. The latter provides that: “Bone X-rays to determine age, in the absence of valid identity documents and when the age claimed is not plausible, may be carried out only by decision of the judicial authority and with the consent of the person concerned. The conclusions of such examinations, which must specify the margin of error, cannot be used as the sole basis for determining whether the person concerned is a minor. The benefit of the doubt thus accrues to the person concerned. In the event of doubt as to the person’s minor age, his or her age cannot be assessed on the basis of an examination of the pubertal development of primary and secondary sexual characteristics.”

21. Under domestic law, the legal regime applicable to bone X-rays for age determination purposes takes account of these conventional requirements. Article 388 of the Civil Code provides that “the conclusions of such examinations, which must specify the margin of error, cannot be used as the sole basis for determining whether the person concerned is a minor” and that “the benefit of the doubt thus accrues to the person concerned” (on the question of bone age tests, see below, information relating to paragraph 92 (d)).

22. While the young person’s minor age and unaccompanied status are being assessed, he or she may benefit from child protection measures such as the right to be accompanied by a person of his or her choice, whether or not representing an association, pursuant to article L. 223-1 of the Social Welfare and Family Code. In addition, insofar as the texts governing this procedure do not expressly exclude it, he or she may be assisted or represented by a lawyer under the conditions set out in article 6 of the Act of 31 December 1971 on the reform of certain judicial and legal professions. The Council of State has reiterated that the interim relief judge of the administrative court has the power to order the prolongation of temporary emergency accommodation arrangements pending the issuance of a court decision (Council of State Decision No. 440686 of 4 June 2020).

23. The European Court of Human Rights, in its judgment in *A.C. v. France*, No. 15457/20 of 16 January 2025, found that French law provides a number of safeguards for persons who present themselves to the internal authorities as unaccompanied minors and whose minor age is in doubt (para. 166); highlighted the contributions of Act No. 2022-140 of 7 February 2022, in particular the change introduced whereby persons claiming to be unaccompanied minors are given a period of respite, thus allowing their health needs to be taken into account before the age assessment procedure is carried out (para. 167); and considered that the domestic legal framework provides the minimum procedural safeguards required under the Convention (para. 183).

C. Information relating to paragraph 92 (c)

24. In accordance with article 47 of the French Civil Code, any civil status record drawn up abroad that has been certified, unless otherwise specified in an international agreement, is considered authentic in France unless there is evidence that it is irregular or falsified or that the facts stated therein do not correspond to reality. Although copies or extracts of non-certified civil status records from countries not exempted from this formality by agreement are devoid of such probative value (1st Civ., 16 October 2019, No. 19-16-353), the documents produced, along with the behaviour of the person concerned, nonetheless form part of the body of evidence substantiating a conclusion as to the person’s minor age (1st Civ., 3 April 2019, No. 18-15-192). This provision establishes a simple presumption of authenticity that applies to the assessment of unaccompanied migrant children. In a case involving an application for a residence permit, the Council of State held that the absence of certification does not rule out the consideration of a civil status document (Council of State, 21 June 2022, No. 457494). However, the presumption of authenticity will be weakened in such a case and the document will be easier to challenge.

25. Under the revised article R. 221-11 of the Social Welfare and Family Code, the assessment of minor age and unaccompanied status is based on national standards set out in an order issued on 20 November 2019. These standards indicate that civil status documents must be taken into account, provided that they are consistent with the person's statements. Those performing the assessment are required to identify any inconsistencies and discuss them with the person concerned, in a context in which his or her rights are ensured.

26. If the authenticity of documents is in doubt, departmental councils may refer the matter to the prefect. The prefect can call on specialized State services, in particular the border police, to carry out technical checks. The results of such checks will supplement the assessment elements included in the body of evidence.

27. National court decisions have set out strict guidelines for the assessment of documents by administrative or judicial authorities:

- Court of Cassation, 1st Civ., 3 April 2019, No. 18-15.192: the Court recognized that trial judges may take account of non-certified civil status records as part of the body of evidence substantiating the claim that the person concerned is of minor age. The formality of certification, although normally required, is thus not an absolute condition for the assessment of minor age.
- Court of Cassation, 1st Civ., 21 November 2019, No. 19-17.726 and No. 19-15.890: these rulings reiterated that the assessment of the authenticity of foreign documents falls within the sovereign power of the juvenile court judge, in the context of an application for a supervision order. The court cannot set aside a document without comparing it with other elements in the file.
- Court of Cassation, 1st Civ., 15 October 2020, No. 20-14.993: the Court reiterated that a juvenile court judge may not reject an application for a supervision order solely on the basis of doubt concerning the authenticity of a foreign identity document. The judge is required to assess the plausibility of the age claimed by the person concerned.

28. The European Court of Human Rights, in its case law (*Tanda-Muzinga v. France*, No. 2260/10, 10 July 2014, paras. 72 and 73), has recognized the difficulties encountered by States in assessing the authenticity of foreign documents and acknowledges that they have a measure of discretion in this regard, provided that the analysis of the documents is objective and reasoned and the right to an effective remedy is respected.

29. France confirms that the documents presented by persons claiming to be unaccompanied migrant children are systematically examined, in compliance with the presumption of authenticity laid down in article 47 of the Civil Code. This presumption may be challenged only in the light of objective factors based on an individualized analysis that upholds the rights of the person concerned. In the aforementioned case of *A.C. v. France*, No. 15457/20, the European Court found that the validity and probative force attributed under French law to foreign civil status documents presented by unaccompanied migrant children does not infringe the provisions of the Convention.

D. Information relating to paragraph 92 (d)

30. In France, bone X-rays are never used as the sole means of determining age. Rather, age determination is based on a body of evidence, and the use of bone X-rays is governed by law.

31. Pursuant to the Child Protection Act (No. 2016-297) of 14 March 2016, article 388 of the Civil Code is intended to strike a balance between the need to determine an individual's age and the need to respect his or her integrity, while bearing in mind the lack of precision associated with the techniques used.

32. Article 388 of the Civil Code exhaustively sets out the conditions under which medical examinations may be used to determine an individual's age.

33. The conditions for resorting to medical examinations are strict (Constitutional Council, decision No. 2018-768 QPC of 21 March 2019, *M. Adama S.*):

- Bone X-rays are carried out as a subsidiary measure if the individual does not have valid identity documents and claims an age that is not plausible. These conditions are cumulative;
- An examination to assess an individual's age must be ordered by a judicial authority (prosecutor or judge), who must first verify that the conditions for resorting to a medical examination have been met. Such examinations may be carried out only with the consent of the person concerned. The doctor is responsible for verifying the person's consent before proceeding with the examination. To this end, it is necessary to ensure that the interview is conducted in a language understood by the person concerned or using the services of an interpreter, the cost of which is borne by the Ministry of Justice;
- The conclusions of the examination must be treated with caution: they cannot in themselves determine whether the person concerned is a minor, the margin of error must be specified and the benefit of the doubt must accrue to the person concerned.

34. Thus, judicial authorities can never base their decisions on the results of the bone age test alone: since bone X-rays are not sufficient in themselves to rule out minor age, judicial authorities must assess minor age on the basis of a body of evidence which, taken as a whole, makes it possible to eliminate any doubt as to the applicant's age.

35. In a decision issued on 12 February 2020 (appeal No. 18-24.264), the Court of Cassation held that, in view of the safeguards set out in article 388 of the Civil Code in connection with the use of bone X-rays to determine age, this article does not disregard the requirement to consider the best interests of the child, laid down in article 3 (1) of the Convention on the Rights of the Child, or article 3 of the Convention for the Protection of Human Rights and Fundamental Freedoms (European Convention on Human Rights). It also reiterated that bone X-rays may be carried out only as a subsidiary measure in the absence of valid identity documents and when the age claimed is not plausible (Cass., 1st Civ., 15 October 2020, No. 20-14.993). It further considered that the findings of bone X-rays cannot be used as the sole means of determining whether the person concerned is a minor and that the benefit of the doubt must accrue to that person (Cass., 1st Civ., 12 January 2022, No. 20-17.343).

36. The last paragraph of article 388 of the Civil Code prohibits examinations of the pubertal development of primary and secondary sexual characteristics, as such examinations are considered incompatible with the dignity of the persons concerned.

E. Information relating to paragraph 92 (e)

37. French domestic law ensures the representation and defence of unaccompanied migrant children in proceedings concerning them.

38. When a minor is involved in administrative or judicial proceedings, in particular those concerning detention in a holding area or asylum area, the Code on the Entry and Stay of Aliens and the Right to Asylum provides for the appointment of an ad hoc administrator by the public prosecutor (arts. L. 343-2 and L. 521-9). The administrator is appointed without delay to represent the minor and defend his or her rights. The administrator's mandate ends when the judge issues a guardianship order, which confers the status of legal guardian on the President of the departmental council (art. 408 of the Civil Code).

39. The procedure for assessing minor age and unaccompanied status prior to any protection is of an administrative nature and does not provide for the appointment of a legal representative at this stage. Its purpose is to verify the absence of legal representatives in French territory and it is accompanied by safeguards in line with the European Convention on Human Rights (*A.C. v. France*, cited above). Once minor age and unaccompanied status have been recognized, the public prosecutor is requested to order a provisional placement and to refer the matter to the juvenile court judge within eight days, so as to ensure full legal protection.

40. The child welfare service to which the minor has been entrusted by the judicial authority may refer the matter to the family court judge in charge of guardianship of minors for the purpose of instituting a guardianship delegated to the President of the departmental council, pursuant to article 411 of the Civil Code. In such a case, the President of the departmental council is the minor's legal representative. If the minor's parents are alive and can be located abroad, the child welfare service may also apply to the judge for full or partial delegation of parental authority, pursuant to article 377 of the Civil Code. In such a case, as the parents are still alive, they remain legally responsible for the child. Their lack of proximity to the child may require the appointment of an ad hoc administrator to defend the minor's interests or carry out administrative procedures in their absence. This designation is mandatory when an asylum application is filed by the minor (art. L. 521-9 of the Code on the Entry and Stay of Aliens and the Right to Asylum). As a result, unaccompanied minors benefit from the appointment of a legal representative under the aforementioned conditions.

41. Lastly, in proceedings before a juvenile court judge, any minor capable of discernment may request the appointment of a lawyer or request the President of the Bar to appoint one (art. 1186 of the Code of Civil Procedure).

42. Under such care proceedings, if the juvenile court judge orders a provisional placement on the basis of article 375-5 of the Civil Code, pending his or her decision on the merits, he or she may authorize the "guardian" service to exceptionally carry out one or more acts of parental authority, as provided for in article 375-7 of the Civil Code. The juvenile court judge may appoint an ad hoc administrator if necessary, i.e. if certain acts requiring a legal representative must be carried out during the provisional placement.

43. Referral of a matter to a juvenile court judge by a person claiming to be an unaccompanied migrant child is identical to any other such referral by a minor under article 375 of the Civil Code.

44. With regard to the asylum application procedure, the Council of State has confirmed (Council of State, 19 November 2024, No. 488034) that an unaccompanied migrant child may not be interviewed by the French Office for the Protection of Refugees and Stateless Persons in the absence of his or her legal representative, unless the minor clearly expresses his or her wishes to the contrary.

45. Guardianship, the most comprehensive and protective measure, tends to be encouraged as a form of legal representation. A working group led by the Directorate for Youth Protection and Juvenile Justice of the Ministry of Justice has been set up to strengthen the effective and prompt appointment of guardians for unaccompanied migrant children.

F. Information relating to paragraph 92 (f)

46. Only persons of minor age can benefit from the care and supervision measures provided for in article 375 of the Civil Code, including being taken into care.

47. In the event that a person's status as a minor is contested by the relevant services of the departmental council, he or she is entitled, under this article, to refer the matter to a juvenile court judge for a care or supervision order. The public prosecutor is also empowered to refer cases to a juvenile court judge if information that gives rise to concern is brought to his or her attention; or the juvenile court judge may act on his or her own initiative, on an exceptional basis. This option makes up for any lack of information and access to justice on the part of the individual.

48. Although, in principle, an individual claiming to be an unaccompanied migrant child can benefit from temporary emergency accommodation, there is no presumption of minor age until the juvenile court judge or the court of appeal has made a final decision. To protect persons claiming to be minors, only a juvenile court judge is competent to entrust a child in danger to a child welfare service on a long-term basis.

49. The judicial authority is thus responsible for assessing both the person's status as a minor and the existence of danger. In this regard, the Council of State, in a decision of principle issued on 1 July 2015, No. 386769, recognized that the only child protection option

available to the departmental council is to choose whether or not to refer the matter to a judicial authority with a view to placement, and to do so within the five-day time frame set by the Social Welfare and Family Code (art. L. 223-2). As a result, when the person concerned petitions the juvenile court judge or the family court judge dealing with guardianship of minors, or the court of appeal, he or she benefits from all the safeguards provided by article 388 of the Civil Code “so that minors are not unduly treated as adults”.

50. Moreover, in proceedings before a juvenile court judge, the person contesting the claim that he or she is not a minor enjoys all the usual procedural rights and safeguards. He or she must be heard in person by the judge (art. 1189 of the Code of Civil Procedure) and be informed of his or her rights (art. 1182 of the Code of Civil Procedure) to consult the case file at any time (art. 1187 of the Code of Civil Procedure) and to be assisted by counsel under the conditions established in article 1186 of the Code of Civil Procedure. He or she can choose a lawyer or request the judge to have one appointed by the President of the Bar. Under article 375-1 of the Civil Code, when the best interests of the child so require, the judge automatically asks the President of the Bar to appoint a lawyer. The costs will be covered by legal aid, which is granted to foreign nationals who are minors, regardless of residency status (art. 3 of the Legal Aid Act (No. 91-647) of 10 July 1991).

51. When a case is referred to a juvenile court judge, he or she may order provisional measures to protect the minor before making a decision. The judge may order the person’s provisional placement in a suitable facility (art. 375-5 of the Civil Code). The judge may also order investigative measures to assist in the assessment of the child’s situation, or propose provisional guardianship.

52. The person concerned may petition an interim relief judge, ruling on the basis of article L. 521-2 of the Code of Administrative Justice, to order the department to continue providing temporary accommodation if the person believes that the department’s assessment that he or she does not have the status of an unaccompanied minor is manifestly erroneous and if the person is at immediate risk of endangerment of his or her health or safety (Council of State, 20 February 2023, No. 471058).

53. It should be noted that some departments have set up schemes and partnerships to provide accommodation for persons awaiting a juvenile court judge’s decision, such as:

- The establishment of dedicated accommodation centres for young people involved in juvenile court proceedings.
- Systematic prolongation of accommodation for the most vulnerable persons and for girls after a notification of refusal of care.
- Partnerships with associations that support young people during the appeals process and put them in touch with “sponsor” families.

54. State authorities are responsible, pursuant to articles L. 345-2, L. 345-2-2, L. 345-2-3 and L. 121-7 of the Social Welfare and Family Code, for implementing the right to emergency accommodation recognized by law as an entitlement of any homeless person who is in a situation of medical, mental or social distress; a failure to perform this duty may, for the purposes of article L. 521-2 of the Code of Administrative Justice, amount to a serious and manifestly unlawful infringement of a fundamental freedom when it entails serious consequences for the person concerned (Council of State, interim relief judge, 17 May 2023, No. 473358).

55. Lastly, it should be recalled that the Child Protection Act of 7 February 2022 added an article L. 221-2-5 to the Social Welfare and Family Code, prohibiting departmental councils from carrying out a new assessment of minor age and unaccompanied status when a minor is sent to a new department after having already been assessed by the department in which he or she arrived.

56. The juvenile court judge’s decision is notified to the minor (art. 1190 of the Code of Civil Procedure), who may file an appeal within 15 days of notification (art. 1191 of the Code of Civil Procedure). The appeal, consisting of a statement made or sent by registered mail to the registrar of the court of appeal, will be dealt with under the appeal procedure without

compulsory representation, which is less formal than the procedure with compulsory representation (art. 1192 of the Code of Civil Procedure).

57. Together, these provisions ensure an effective remedy in cases where a person's age is in dispute. In this regard, the European Court of Human Rights has held that the remedies offered by domestic law, taken together, constitute effective remedies for ensuring respect for the principle of presumption of minor age (*A.C. v. France*, No. 15457/20, 16 January 2025, paras. 207–211).

G. Information relating to paragraph 92 (g)

58. In accordance with civil procedure under ordinary law, the judge ensures that no party is judged without having been heard or called (art. 14 of the Code of Civil Procedure). An *a contrario* reading of article 23 of the Code of Civil Procedure shows that the judge must use the services of an interpreter when he or she does not know the language used by the parties.

59. In the assessment of the minor age and unaccompanied status of a person claiming to be an unaccompanied migrant child, positive law also guarantees interpretation into a language understood by the person concerned.

60. Article R. 221-11 of the Social Welfare and Family Code provides that the duration of the respite period is to be determined by the President of the departmental council in accordance with the time required for the person to be informed, in a language he or she understands, of the procedures and issues involved in the assessment. It expressly states that interviews conducted by professionals “shall be conducted in a language understood by the person concerned”.

61. Article 4 of the order of 20 November 2019 setting out standards for the assessment of persons claiming to be minors and temporarily or permanently deprived of family protection states that: “The social assessment shall be conducted in a language understood by the person concerned, if necessary with the assistance of an interpreter demonstrating neutrality with regard to the situation.”

62. The guide to best practices for assessing minor age and unaccompanied status supplements and expands on these provisions, stating that: “In particular, while the assessment of minor age and unaccompanied status is based on clearly identified criteria, it is important to facilitate the person's ability to express himself or herself freely in his or her own words. The manner of doing so is left to the evaluator's discretion, depending on the situation, and the evaluator is responsible for going over any points requiring clarification, particularly if the declarant's account includes elements that are inconsistent, improbable or implausible. The aim is for the evaluator to gather and analyse as much information as possible.”

63. Accordingly, it is necessary to:

- (a) Secure the services of a translator-interpreter, wherever possible in person, as soon as the slightest difficulty in using or understanding the French language is detected;
- (b) Use visual aids or translated documents.

64. The French Government has verified the implementation of these provisions by examining anonymized assessment reports transmitted by various departments, which mention the use of interpretation services when the young person does not have a full command of the French language. A few extracts from such reports may serve as examples:

- (a) “The interview was held in Tunisian Arabic using Inter Service Migrants (ISM) interpretation services by telephone”;
- (b) “Mr. XXX does not speak French, so the interviews were held using telephone interpretation services in Malinke”.

65. As part of the asylum procedure, and in particular during the interview with the French Office for the Protection of Refugees and Stateless Persons, the minor is heard “in the language of his or her choice or in another language of which he or she has a sufficient

command” (art. L. 531-13 of the Code on the Entry and Stay of Aliens and the Right to Asylum). Minors may expressly request the presence of an interpreter of the gender of their choice (art. L.531-17 of the Code on the Entry and Stay of Aliens and the Right to Asylum). Interpreters, in their attitude and conduct and in the words that they use, are required to maintain complete neutrality with regard to the statements made by the person being interviewed, without expressing any value judgment or assessment (Interpreters’ Charter, 24 November 2023). As part of their training, they are systematically made aware of how to conduct themselves during interviews with vulnerable persons, including unaccompanied migrant children.

H. Information relating to paragraph 92 (h)

66. The Act of 26 January 2024 on Controlling Immigration and Improving Integration put an end to the immigration detention of minors accompanying a parent against whom a removal order is issued in mainland France (unaccompanied minors have never been subject to immigration detention), even though the “Return Directive” authorizes it. For the Department of Mayotte, the aforementioned Act postponed the entry into force of this measure to 1 January 2027, in view of the territory’s specific characteristics. However, in order to take account of the particular immigration pressure (strongly family-based) encountered by the territory of Mayotte, the reform bill for Mayotte that was definitively adopted by Parliament on 10 July 2025 postponed this entry into force to 1 July 2028. The bill also allows the Prefect of Mayotte to place foreign nationals accompanied by minors in places specially adapted to the needs of the family unit, for such time as is strictly necessary to organize the removal, which may not exceed 48 hours. The characteristics of such places, which are separate from holding areas and ensure that family members have adequate privacy and conditions that take into account the best interests of the child, will be defined by decree of the Council of State.

67. The principle of the best interests of the child is applied in holding areas. Minors, especially unaccompanied migrant children, are considered vulnerable persons. As such, they receive special attention (art. L. 332-2 of the Code on the Entry and Stay of Aliens and the Right to Asylum).

68. The public prosecutor is immediately notified of unaccompanied migrant children’s non-admission and placement in a holding area. The prosecutor then appoints an ad hoc administrator to assist the minor throughout his or her stay in the holding area and to support him or her in administrative and judicial proceedings relating to his or her stay in the holding area, entry into France or asylum application, where applicable (art. L. 343-2 of the Code on the Entry and Stay of Aliens and the Right to Asylum). The ad hoc administrator’s role is to ensure that the minor has access to clear, comprehensible information for the exercise of his or her rights. Minors who are denied entry automatically benefit from a 24-hour period of protection from expulsion.

69. Minors are entitled to all the rights granted to adults being held, namely:

- The assistance of an interpreter.
- The ability to consult a physician.
- Communication with counsel or any other person of their choice.
- The ability to leave the holding area for purposes of removal.
- The right to seek asylum.

70. To the extent possible, unaccompanied migrant children can benefit from separate, dedicated facilities and spaces. In holding areas with a structure equipped with rooms but no dedicated facilities for minors, vulnerable persons are placed in a room or area reserved for their exclusive use. Specific monitoring is put in place and, if necessary, a medical examination is immediately ordered. Holding areas using hotel facilities must provide minors with individual rooms and special supervision. In smaller holding areas, a space can be set aside for vulnerable persons, as required.

71. Under article L. 351-2 of the Code on the Entry and Stay of Aliens and the Right to Asylum, an unaccompanied migrant child may be kept in a holding area for only such time as is strictly necessary to determine whether his or her asylum application is not inadmissible or manifestly unfounded, and only if he or she comes from a safe country, or submits an application for reconsideration that is not inadmissible, or has submitted false documents or provided false information, or if his or her presence in France poses a serious threat to public order, public safety or State security. The decision to apply this article rests with the French Office for the Protection of Refugees and Stateless Persons as part of the procedure.

72. When unaccompanied foreign minors under the age of 13 are to be removed, they can only be sent back to their country of origin, and every precaution is taken to ensure that such minors are properly cared for on arrival. The local representative of the Directorate for International Security Cooperation is immediately contacted so that a member of the child's family can take charge of him or her. All relevant information is obtained from the company that provided the minor's transport.

73. In all cases, unaccompanied minors may be removed only if the border police have received information on the person who will take charge of them on their return.

74. Unaccompanied migrant children who are not removed are handed over to the President of the departmental council, who is responsible, in conjunction with the judicial authorities, for organizing temporary emergency accommodation for minors deprived of family protection.

75. The number of unaccompanied migrant children placed in holding areas in mainland and overseas France totalled 149 in 2023 and 146 in 2024.

I. Information relating to paragraph 92 (i)

76. The Committee's report states that "there are very few official figures on unaccompanied migrant children in State care, and particularly few on the procedure for the recognition of minority status" and that "the departmental authorities provide no information on the recognition rate following their assessments".

77. An agency agreement has been signed between the State and the Services and Payment Agency to administer the State's lump-sum contribution to the expenses incurred by the departments for the accommodation and assessment of persons claiming to be minors and temporarily or permanently deprived of family protection. Under the agreement, the Agency reports to the Government on the situation and management of the system, providing monthly statistics on shelter admissions and assessments for the purposes of requests for payment of the State's lump-sum contribution.

78. However, these data are only indicative insofar as they are self-reported and must, under the aforementioned agreement, be checked by the Agency for consistency among all the data entered in the payment request form filled out by the departments and are also subject to an a posteriori verification schedule.

79. In 2024, 13,554 placement orders and judgments concerning unaccompanied minors were brought to the attention of the National Unaccompanied Minors Team of the Directorate for Youth Protection and Juvenile Justice, which reports to the Ministry of Justice. This represents a decrease of almost 30 per cent compared to the 2023 figure (19,370 placement decisions). This is the lowest number of judicial decisions recorded since 2021.

80. These data, published on the Ministry of Justice website, show the number of new judicial decisions entrusting unaccompanied minors to departmental councils. No personal data are published.

J. Information relating to paragraph 92 (j)

81. The State helps defray the expenses incurred by the departments in accommodating and assessing persons claiming to be unaccompanied migrant children. An increase in the State's lump-sum contribution to these expenses was agreed to in consultation with the

Association of French Departments in 2018. Pursuant to the Child Protection Act of 7 February 2022, provision for such a contribution was made in article L. 221-2-4 of the Social Welfare and Family Code.

82. The contribution comprises €500 for social and initial health assessments and €90 per person per day, up to a maximum of 14 days, then €20 per person per day, up to a maximum of 9 additional days, for accommodation. According to consolidated data from the Services and Payment Agency, in 2023 the average length of accommodation nationwide was 17.5 days. These amounts correspond to the cost of social and health needs assessments, as estimated in 2018 in a joint report of the Association of French Departments and the State.

83. In 2018, the Government undertook to provide assistance to the departments on an exceptional basis for the care of unaccompanied migrant children entrusted to child welfare services by judicial authorities. This exceptional funding was continued in 2019 in the amount of €33.6 million, and in subsequent years in the amount of €6,000 per young person for 75 per cent of the additional unaccompanied migrant children taken into care by child welfare services between two reference years (i.e. €17,562 million in 2023 and €31,944 million in 2024).

84. Once their minor age and unaccompanied status have been recognized, unaccompanied migrant children are cared for under the child protection system in the same way as all other young people. In the context of decentralization, this responsibility falls to the departments. Lastly, many calls for projects and statements of work published by the departments for the accommodation and care of unaccompanied minors under the child protection system provide for daily rates of around €100. As in the case of any young person in the child protection system, the adaptation of care arrangements and the type of accommodation (collective, family-based, semi-autonomous, etc.) depend on the needs of the minors concerned.

K. Information relating to paragraph 93 (a)

85. Regulations provide that when persons claiming to be unaccompanied migrant children are given shelter, they must be offered accommodation suited to their situation, as well as initial social support. For homeless persons who do not seek assistance from the child welfare services, some regions have developed outreach approaches implemented by trained professionals and mobile teams.

86. If a person claiming to be a minor is recognized as an adult by the department, he or she is entitled to apply for accommodation under article L. 345-2-2 of the Social Welfare and Family Code within the framework of ordinary law provisions on emergency accommodation. The December 2019 guide to best practices for assessing minor age and unaccompanied status also provides a reminder of the need to advise persons recognized as adults of their rights in this regard. While the guide specifies that the fact that a person has turned to the care system for adults should not be construed as an implicit acknowledgement that he or she is not a minor, the President of the departmental council is invited to provide the person with a document, validly notified and referring to available remedies, expressly indicating that the person has been denied care under the child protection system.

L. Information relating to paragraph 93 (b)

87. Due to their geographical location, the Departments of Pas-de-Calais and Nord tend to receive two types of unaccompanied migrant children in particular: young people who wish to be taken into care under the child protection system and young people who are trying to reach the United Kingdom and thus do not wish to settle in France.

88. In Pas-de-Calais, the situation has changed considerably since the dismantling of the refugee camp on the Calais heath in November 2016. When the dismantling took place, all those present in the area, particularly minors, were given shelter.

89. In the period since the European Court of Human Rights ruled against France in its judgment of 28 February 2019 (*Khan v. France*, No. 12267/16), a number of measures have been taken in the Departments of Pas-de-Calais and Nord, particularly along the coast.

90. The Departmental Council of Pas-de-Calais is taking proactive measures to reach out to people in the main migrant areas it has identified and to provide them with information on their rights. The association France terre d'asile (FTDA), with which the Departmental Council has been working since 2009, has been given the task of carrying out daily "rounds" and systematically offering shelter to minors. Such shelter was initially provided at the child protection centre in Saint-Omer (a town about 50 km from Calais). Since 2024, shelter has been provided in the towns of Longuenesse and Arras, as the new premises there offer better conditions for the minors taken in.¹ When these shelters are full, the Departmental Council can make use of 15 places in a children's social care home for unaccompanied minors in Divion, as well as 6 places in a children's social care home managed by FTDA.

91. The Department decided that such children should be sheltered at a distance from Calais, while remaining within easy reach (around 20 minutes by car), so that they will be kept away from the dangers posed by smuggling rings and mafia networks, which are rife in the camps, while enabling FTDA staff to visit them on a daily basis. The number of shelter places has been increased from 45 in 2016 to 80 in 2024. For 2025, the system may be temporarily expanded by 20 places in the event of excess demand.

92. Since August 2017, the State has granted funding to FTDA, enabling it to step up its outreach rounds in recent years.² In addition to the public allocations and lump-sum subsidies granted to FTDA, the State makes a specific financial contribution to the organization's outreach activities in the Department of Pas-de-Calais. Since July 2017 such funding has been provided by the Departmental Directorate for Social Cohesion, and since June 2020 by the Directorate General for Foreign Nationals in France of the Ministry of the Interior. In 2023, the Departmental Directorate of Employment, Labour and Solidarity took over the governance of State subsidies, which amount to €636,000 and fund five of the seven outreach workers. In addition, the Department of Pas-de-Calais provides a lump-sum allocation to FTDA for all its activities, from offering shelter to managing the three stabilization facilities. This allocation amounted to €9,169,508 for 2024. The share earmarked for shelter was €2,228,507, supplemented by an amount of €348,381 paid annually from the European Social Fund for the period 2024/25.

93. The outreach activities of FTDA are based on spotting and identifying unaccompanied foreign minors on the Calais coast. The multidisciplinary team is made up of seven street outreach workers who visit these areas of Calais on a daily basis and are able to establish contact in the different languages spoken in the camps. A nurse accompanies the teams for half a day each week. Today, these rounds are carried out seven days a week year-round (including public holidays), every afternoon from 1.30 to 6 p.m. or even later, depending on the situation in Calais. They are adapted to the circumstances during periods of extreme cold, in order to identify and shelter young people. The Department's shelter team is trained to identify situations of trafficking in persons. Outreach teams visit identified migrant areas and day centres serving the public (Red Cross, Médecins sans frontières, etc.). The teams work closely with local institutions and associations (mandated or voluntary associations, border police, hospitals, etc.).

94. The FTDA team is in daily contact with associations not mandated by the State (ECPAT,³ Utopia 56, Secours Catholique, Médecins sans frontières) regarding young people identified by these actors. Such young people are particularly likely to be found at the Secours Catholique day centre. Three or four times a year, the Department meets with all these associations to facilitate access to minors and to coordinate their actions. Four times a year,

¹ <https://www.france-terre-asile.org/etablissement/maison-du-jeune-refugie-de-saint-omer-3>; *La Voix du Nord*, "Pourquoi les mineurs étrangers mis à l'abri par France terre d'asile ont quitté Saint-Omer pour Longuenesse", 27 August 2024 (<https://www.lavoixdunord.fr/1496085/article/2024-08-27/pourquoi-les-mineurs-etrangers-mis-l-abri-par-france-terre-d-asile-ont-quitte>).

² The outreach teams were enlarged from five to seven people in 2021.

³ End Child Prostitution, Child Pornography and Trafficking of Children for Sexual Purposes.

the Calais sub-prefecture meets with all the actors involved in the wider issue of support for migrants, both adults and minors.

95. Since the spring of 2021, following the expansion of the outreach teams, camper van outreach rounds have been carried out.⁴ This “mobile office” has made it possible to conduct individual interviews close to migrant areas in Calais. The confidential setting has enabled outreach workers to discuss more personal issues (questions on health, living in the camps, information on the person’s migration history, etc.). These personalized exchanges have also provided opportunities to offer more detailed information on rights. The impact of these outreach rounds is maximized through the use of tablets and WhatsApp messaging, which is widely used by young migrants.

96. In order to carry out the necessary health checks, the young people are taken to the healthcare access centre at the Calais hospital and to the Red Cross medical centre. A temporary nurse also works at the shelter.

97. In the Department of Nord, the number of shelter places has been increased from 30 in 2016 to 206 in 2024. The Department of Nord does not directly fund outreach operations along the coast, but instead provides unconditional care to all persons claiming to be unaccompanied migrant children, day and night. It nevertheless relies on the State-funded Association des Flandres pour l’éducation, la formation des jeunes et l’insertion sociale et professionnelle (Flanders Association for Education, Youth Training and Social and Occupational Integration) outreach teams to identify unaccompanied migrant children in need of shelter. It also has links with associations working along the coast (French Red Cross, Utopia 56), and meetings with these entities are organized.

98. The Department of Nord relies on:

- (a) A mobile team for child psychiatric care;
- (b) Work at shelter sites by psychologists in establishments and services that organize the care of unaccompanied migrant children in the Department;
- (c) A partnership with the association Koutcha to identify and deal with situations of trafficking in persons.

99. The Department is also working to combat trafficking in persons. A delegation from the Council of Europe Group of Experts on Action against Trafficking in Human Beings visited Calais on 19 June 2025 as part of its evaluation visit to France regarding the implementation of the Council of Europe Convention on Action against Trafficking in Human Beings (Warsaw Convention). The delegation met with civil society actors, including the ECPAT France teams that conduct outreach rounds to identify unaccompanied migrant children. The delegation also met with the public authorities of Pas-de-Calais (prefecture, police and gendarmerie, border police, Boulogne-sur-Mer Court, departmental authorities).

100. Lastly, it should be emphasized that the follow-up to the *Khan v. France* case was brought to a close by a resolution adopted by the Committee of Ministers of the Council of Europe on 6 March 2025, in view of the commitments and continued efforts by France, which has developed its regulatory framework and adopted concrete measures demonstrating an increase in material, human and financial resources; these measures have resulted in significant progress in terms of identifying and sheltering unaccompanied migrant children. The partnership approach adopted by France was identified by the Department for the Execution of Judgments of the European Court of Human Rights and by the Committee of Ministers of the Council of Europe as a good practice to be disseminated among States Parties, many of which face similar problems.

M. Information relating to paragraph 93 (c)

101. National law clearly defines the principle of the right to education. In accordance with the national circular on the organization of schooling for newly arrived non-French-speaking

⁴ Made possible by grants from the Directorate General for Foreign Nationals in France of the Ministry of the Interior and Overseas Territories between March 2021 and March 2023.

pupils (NOR: REDE1236612C, Circular No. 2012-141 of 2 October 2012, RED – DGESCO A1-1), schooling is a right for all children residing in the national territory regardless of their nationality, immigration status or past history, as specified in the Education Code, of which articles L. 111-1, L. 122-1 and L. 131-1 set out the obligation to educate all children, and articles L. 321-4 and L. 332-4 set out the obligation to carry out special initiatives to integrate and educate newly arrived non-French-speaking children.

102. The Education Code affirms the principle of school inclusion for all children and the requirement to take account of the special educational needs of non-French-speaking pupils newly arrived in French territory, including unaccompanied migrant children: “The public education service ... shall ensure the school inclusion of all children, without distinction” (art. L. 111-1). A school placement test is administered to provide a basis for the design of a school learning or training plan. Thus, according to Circular No. 2012-141 of 2 October 2012, “At all stages of schooling, specific pedagogical support shall be provided to students who demonstrate special educational needs ... Non-French-speaking pupils newly arrived in France shall benefit from specific actions to facilitate their integration and schooling” (arts. D. 321-3-4 and D. 332-6 as amended by Decree No. 2014-1377 of 18 November 2014).

103. The School Reform Policy and Programming Act, adopted on 8 July 2013, reaffirms the requirement to promote inclusive schooling for all pupils with special educational needs, as a matter of ordinary law. The aim is to enable all students to be enrolled in mainstream schools without delay and to meet any temporary or long-term needs they may have. Circular No. 2012-143 of 2 December 2012 on the organization of learning centres for the education of newly arrived non-French-speaking students and children from itinerant and Traveller families redefined the mandate of these centres, which are responsible for monitoring the schooling of such pupils through active, ongoing cooperation between academic and departmental services, municipalities, social services and partner associations. Since the start of the 2020/21 school year, to ensure that no young person is left in a situation where he or she is neither in education or training nor in employment, compulsory schooling has been extended to the age of 18.

104. In an interministerial circular of 25 January 2016 on the mobilization of State services in departmental councils concerning minors temporarily or permanently deprived of family protection and persons presenting themselves as such, it is recalled that “the schooling of unaccompanied foreign minors ... residing in French territory is therefore subject to ordinary law and to provisions on compulsory schooling, under the same conditions as other pupils. It is not the role of the Ministry of Education, Higher Education and Research to verify the status of foreign students in respect of the rules governing their entry and stay in France. The enrolment of a pupil of foreign nationality, regardless of age, in an educational institution may not be made conditional on the presentation of a residence permit.”

N. Information relating to paragraph 93 (d)

105. France complies with the provisions of the Convention on the Rights of the Child, which provides in article 20 that: “A child temporarily or permanently deprived of his or her family environment, or in whose own best interests cannot be allowed to remain in that environment, shall be entitled to special protection and assistance provided by the State.” This includes children who are asylum-seekers, refugees or migrants. Any young person claiming to be an unaccompanied minor must be considered “a child in need of protection, and therefore subject to the legal provisions on child protection”, rather than “a foreigner, subject to the jurisdiction of the State”.

106. As far as application in domestic law is concerned, instruction DGS/SP1/DGOS/SDR4/DSS/SD2/DGCS/2018/143 of 8 June 2018 on the implementation of healthcare pathways for newly arrived migrants encourages the design of territory-specific healthcare pathways for migrants, with the coordination of local actors around this objective.

107. In its opinion of 7 November 2019, the High Council for Public Health recommends, in line with the instruction of 8 June 2018, the organization of a “health appointment” for young foreigners during the temporary emergency accommodation phase, to identify those who require a medical consultation without delay and those for whom an appointment can be

made on a non-emergency basis. This health needs assessment must be separate from the evaluation process. Observations made during the evaluation interview should also be used to identify signs of psychological fragility and physiological disorders, so that appropriate follow-up can be promptly initiated. In accordance with article R. 221-12 of the Social Welfare and Family Code, the cost of this initial assessment of health needs is among the expenses reimbursable by the State through its lump-sum contribution towards defraying the expenses incurred by departmental councils in this initial shelter and assessment phase.

108. The organization of the appointment to identify the health needs of persons claiming to be unaccompanied migrant children is under the responsibility of the President of the departmental council. The health appointment can be conducted by a nurse delegated by a referring doctor, with the help of a professional interpreter if required, and in coordination with a specialized care network including mental health services, when necessary. The first step is to design a care plan and set up entitlements to health insurance. Unaccompanied foreign children must give their consent for each type of care, screening procedure and vaccination. The child, accompanied by a trusted adult, is referred to the various care structures identified in advance. The High Council for Public Health recommends a two-stage health appointment, taking into account the age claimed by the person: (i) firstly, within 48 hours of sheltering, an initial health orientation interview; (ii) secondly, at least three days after the orientation interview, once the person has been stabilized, a medical appointment (interview and full clinical examination, including a mental health assessment).

109. The implementation of the High Council's recommendations on the initial assessment of health needs during the evaluation phase has resulted in the development of a guide to best practices. The guide, published in November 2022, concerns the initial assessment, during the temporary emergency accommodation phase, of the health needs of persons claiming to be unaccompanied minors. It was drawn up by a multi-partner working group led by the Directorate General for Health and the Directorate General for Social Cohesion and comprising representatives of the Ministry of Health and Prevention, the State Secretariat for Children, the Ministry of Justice (Directorate for Youth Protection and Juvenile Justice), representatives of departmental councils, regional health agencies and health professionals. The guide, designed for professionals responsible for supporting persons who claim to be unaccompanied migrant children, describes how the assessment of health needs should be organized and lists information on the rights of persons claiming to be unaccompanied migrant children. Lastly, it clarifies how health insurance entitlements are set up during this period.

110. Article R. 221-11 of the Social Welfare and Family Code stipulates that "during the respite period, the President of the departmental council shall ensure that the person's health needs are identified with a view to referring him or her to suitable care, where appropriate. Information obtained in this context may not be used to assess the person's minor age or unaccompanied status. The duration of the respite period shall be determined by the President of the departmental council on the basis of the person's situation at the time, in particular his or her state of physical and mental health, and the time needed for the person to be informed, in a language he or she understands, of the procedures and issues involved in the assessment." Since 2019, the State has contributed €100 per person towards the costs of this initial health needs assessment.

111. Unaccompanied migrant children are covered by the ordinary law on child protection. Thus, as soon as they are admitted to the child welfare services, they benefit from full health coverage (universal health coverage and supplemental solidarity-based coverage). Their care needs are reflected in a personalized care plan, a document that structures the support provided. Like all protected minors, such children receive a full health check-up when they enter the child protection system, in accordance with article L. 223-1-1 of the Social Welfare and Family Code. This check-up provides the basis for regular, coordinated medical follow-up and has been covered by the health insurance scheme since 2020. The Act of 7 February 2022 formalized the requirement for the coordination of care plans, particularly for minors with disabilities.

O. Information relating to paragraph 93 (e)

112. As mentioned previously, unaccompanied migrant children taken into care by the child welfare services are covered by the ordinary law on child protection. Thus, as soon as they are admitted to the child welfare services, they benefit from full health coverage (universal health coverage and supplemental solidarity-based coverage).

113. Accordingly, they can be referred to child psychiatrists, centres providing medico-psychological or medico-psychopedagogical services, regional psychological trauma centres, mobile child psychiatry teams and the full range of related services available under ordinary law. They can also benefit from the “My Psych Support” scheme.

114. As noted above, their care needs are reflected in a personalized care plan, a document that structures the support provided. Like all protected minors, they receive a full health check-up when they enter the child protection system, in accordance with article L. 223-1-1 of the Social Welfare and Family Code. This check-up provides the basis for regular, coordinated medical follow-up and has been covered by the health insurance scheme since 2020. The Act of 7 February 2022 formalized the requirement for the coordination of care plans, particularly for minors with disabilities. This health and preventive check-up identifies prevention and care needs with a view to improving the child’s physical and mental health.

P. Information relating to paragraph 93 (f)

115. In order to harmonize practices, assessments of minor age are conducted in accordance with national standards established by an order of 20 November 2019 setting out the factors that must be assessed and specifying the qualifications or experience required for persons who carry out such assessments. In 2019 the Directorate General for Social Cohesion published a guide to best practices in the assessment of minor age and unaccompanied status, drawn up by a working group consisting of representatives of the Ministry of Justice, the ministry in charge of the family, the Ministry of the Interior, the Ministry of Partnership with the Territories and Decentralization, the judicial branch, the departments and the voluntary sector. This guide is a practical tool that has been made available to the services involved in such assessments; it provides a reminder of the applicable legal framework and identifies best practices. The guide focuses in particular on the need to be mindful of the specific issues involved in the care of unaccompanied migrant children, the migration history and traumas of unaccompanied migrant children, the legislation applicable to the status of unaccompanied minors and young adults, ethics and the prevention of socioprofessional risks. It also raises the awareness of assessors and professionals on the issue of human trafficking and the identification of potential victims.

116. In March 2022, a coordination group on the risks of human trafficking faced by displaced persons fleeing the war in Ukraine was set up, led jointly by the Office of the United Nations High Commissioner for Refugees (UNHCR) and the Interministerial Task Force to Protect Women against Violence and to Combat Human Trafficking, which is the national coordinator of the fight against human trafficking in France. The group brought together government departments, international organizations and associations that specialize in supporting trafficking victims, asylum-seekers and refugees and in child protection.

117. The outcome of the work carried out was the creation, in June 2022, of the following prevention tools relating to the detection of situations of violence against or trafficking of unaccompanied migrant children:

- A flyer for displaced persons, with key messages on preventing the risks of trafficking and exploitation, and useful contact information.
- A child-friendly flyer raising awareness of the risks of trafficking and exploitation.
- These flyers are complemented by two leaflets designed for displaced adults and minors. Their purpose is to raise awareness of the risks of trafficking and exploitation, with a list of potential warning signs, the actions advised and the associations to contact. For children, this tool is adapted for use by unaccompanied migrant children.

118. These prevention tools have been translated into Ukrainian, English and Russian. They were distributed through several channels:

- On the websites of UNHCR (<https://help.unhcr.org/france/en/>), the Ministry of the Interior and Overseas Territories,⁵ the Interministerial Task Force on Accommodation and Access to Housing and a number of associations, such as the coalition “Ensemble contre la traite des êtres humains” (Together against human trafficking), which brings together 28 associations.
- The Interministerial Crisis Group on Ukraine sent these materials to the prefectures, which distributed flyers and posters.
- Information was posted in some train stations where displaced persons arrive in France.
- By the French Office for Immigration and Integration to its agents and to accommodation facilities and reception centres for asylum-seekers.
- The tools designed for children were distributed by the National Unaccompanied Minors Team of the Ministry of Justice to departmental councils (which implement various actions as part of the child protection policy), at their request.

119. In addition, on 1 July 2022, the Interministerial Task Force on Accommodation and Access to Housing, the Ministry of the Interior and the Interministerial Task Force to Protect Women against Violence and to Combat Human Trafficking held a webinar to raise awareness of the risks of trafficking, aimed at associations involved in lodging and accommodation, in collaboration with the associations Comité contre l’esclavage moderne, Amicale du Nid and ECPAT. In October 2022 the French Red Cross held a webinar to raise awareness of human trafficking issues for its network of employees and volunteers, in collaboration with the Interministerial Task Force to Protect Women against Violence and to Combat Human Trafficking, the Ministerial Statistical Department for Internal Security and the “Ensemble contre la traite des êtres humains” coalition.

120. Training for agents of the French Office for Immigration and Integration is organized with UNHCR, in collaboration with associations, on identifying situations of trafficking and vulnerability in mainland France and the overseas territories.

121. Training courses have been set up at the regional level for social workers in the national system for the reception of asylum-seekers, including a specific module on human trafficking, as part of the Vulnerabilities Plan run by the Asylum Directorate of the Directorate General for Foreign Nationals in France of the Ministry of the Interior.

122. Every year, the Subdirectorate of Residence and Labour of the Directorate General for Foreign Nationals in France organizes training modules on the issuance of permits on humanitarian grounds, in particular to foreign nationals who are victims of human trafficking or procuring or who are on a pathway out of prostitution (induction module, advanced module, webinar), for prefecture staff who process applications for residence permits and for supervisors who take part in meetings of departmental commissions to combat prostitution, procuring and trafficking in persons for purposes of exploitation. It should be noted that under article R. 425-5 of the Code on the Entry and Stay of Aliens and the Right to Asylum, local prefects can issue temporary residence permits marked “private and family life” to minors aged 16 or over who have lodged a complaint in which they claim to be victims of human trafficking or procuring, who meet the conditions set out in article L. 425-1 of the Code and who express a wish to engage in wage employment or vocational training.

123. France mobilized its regional psychological trauma centres in response to the war in Ukraine and the reception of refugees in the country. Various actions were carried out and shared between such centres to produce resources for host families, refugees and professionals, as well as information materials on psychological trauma written in English,

⁵ Protection contre les violences et l’exploitation | Ministère de l’Intérieur et des Outre-mer (interieur.gouv.fr).

French and Ukrainian, which were shared within the network. Training has been provided in the context of the emergency to raise awareness among responders.

124. With regard to identifying situations of gender-based and sexual violence and human trafficking that may involve unaccompanied migrant children, the Interministerial Task Force to Protect Women against Violence and to Combat Human Trafficking worked with all of its State and civil society partners to produce a training guide for professionals, which was distributed in October 2022 and entitled “L’identification et la protection des victimes de traite des êtres humains” (Identifying and protecting victims of human trafficking).

125. The Interministerial Task Force coordinates the ecosystem of associations working to combat all forms of trafficking in persons (around 40 associations, some of which focus on minors) and promotes the use of tools developed by specialized associations among all professionals in contact with unaccompanied migrant children.

126. The association Hors la Rue (Off the Street) has prepared two tools: (i) a guide to help professionals better understand the needs of unaccompanied minors forced to commit offences, the aim of which is to support foreign children and adolescents at risk by promoting and ensuring their effective access to the services available to foreign minors at risk in the context of migration; (ii) a guide entitled “Parlons grossesse” (Let’s talk about pregnancy), available in French and Romanian, which is designed to be understood by minors who do not have a good command of French. This guide was produced to provide a visual aid for the association’s street outreach campaigns, enabling outreach workers to discuss pregnancy and the post-partum period (medical care for the baby and mother, the French health system, etc.) with the minors they meet.

127. The association InfoMIE (of which the Directorate for Youth Protection and Juvenile Justice and the Directorate General for Social Cohesion are partners) offers the only national platform designed to “contribute to the protection, defence, access to rights and social and occupational integration of foreign unaccompanied minors and young adults”, through the operation of a resource centre for the various actors supporting and working with these vulnerable young people.

128. Finally, as part of the implementation of the third national plan to combat exploitation and trafficking in persons, 2024–2027, the Interministerial Task Force to Protect Women against Violence and to Combat Human Trafficking is drawing up practical information materials for various front-line professionals who may be in a position to detect, guide and support unaccompanied minors and unaccompanied migrant children: (i) coordinators of local and inter-municipal security and crime prevention councils; (ii) education welfare officers working in shanty towns and informal settlements; (iii) departmental council staff who assess minor age and unaccompanied status; and (iv) social workers at police stations and gendarmeries.

129. For each of these professional categories, dedicated webinars are held to explain the indicators for detecting signs of human trafficking in children or adolescents.

130. In 2015, the French Office for the Protection of Refugees and Stateless Persons produced an asylum guide for unaccompanied foreign minors in France, aimed at unaccompanied migrant children and the professionals involved in supporting them. Available on the www.ofpra.gouv.fr website, it is distributed to all those involved in child protection and the asylum system. The guide invites minors to report any abuse or exploitation they may have suffered since arriving in France to the examining protection officer during their personal interview at the Office, in order to help ensure their protection. An update for 2025 is currently in preparation.

131. Several pages on the Office’s website concern children exposed to violence: two pages are dedicated to asylum applications from unaccompanied migrant children⁶ and several sections are devoted to asylum applications based on a risk of female genital mutilation,⁷ a

⁶ [Asylum/Statelessness/Unaccompanied minors](#) For professionals/Institutions/[You accompany a minor](#).

⁷ [Asylum/Statelessness/Taking vulnerabilities into account/Asylum in case of female genital mutilation](#) For professionals/Institutions/[You support people exposed to female genital mutilation](#).

reason invoked in the majority of cases by underage girls. In terms of information and awareness-raising, content focusing on human trafficking and female genital mutilation is offered.

132. Since 2017, an internal system has been in place to enable examining protection officers to provide emergency numbers, useful numbers and contact details of specialized associations to asylum-seekers who, upon being interviewed at the Office, have been identified as being involved in human trafficking or violence against women, in order to facilitate their care or safe shelter. The system also covers other causes of vulnerability within the meaning of recital (17) of Regulation (EU) 2024/1348 of the European Parliament and of the Council of 14 May 2024 establishing a common procedure for international protection in the Union and repealing Directive 2013/32/EU, including age and sexual or gender-based violence. It was updated in 2025 and has now been extended to the overseas territories.

133. In 2025, the Interministerial Task Force to Protect Women against Violence and to Combat Human Trafficking has been working with the French Office for the Protection of Refugees and Stateless Persons to jointly develop information flyers on trafficking in persons and violence against women, aimed at asylum-seekers and beneficiaries of international protection, including minors.

134. Lastly, in Paris on 6 February 2025, the Directorate for Youth Protection and Juvenile Justice held the first Annual Meeting on Unaccompanied Minors, bringing together nearly 400 professionals from the services for child protection, youth protection and juvenile justice, as well as law enforcement officers and social workers. After a presentation on the activities and data of the National Unaccompanied Minors Team and the challenges posed by the coming of age of unaccompanied migrant children taken into care in the child protection system, the afternoon was devoted to the consideration of ways of detecting and preventing human trafficking.

Q. Information relating to paragraph 93 (g)

Training courses at the National School for the Judiciary and participation in intra-European projects

135. In initial training, the rights of asylum-seeking children are addressed from the angle of child protection, in particular the protection of unaccompanied migrant children:

- In prosecutor training courses, three hours of study are devoted to minors at risk. The learning goal is to understand the role of the Public Prosecution Service in the child protection system. Practical cases involving unaccompanied minors are submitted to the trainees, who are asked to indicate how they should be addressed through care or supervision orders (administrative and judicial protection).
- As part of the training of juvenile court judges, trainees learn about child protection systems, the reporting circuit, the organization of departmental councils in their role of prevention, assessment and reporting, and the central role of public prosecutors. In particular, as part of the preparation for their role as juvenile court judges, they take part in three hours of training on unaccompanied minors and human trafficking, led by the President of the special juvenile division of the Paris Court of Appeal and a sociologist specializing in this issue. During this training, they are given detailed documentation to help them in their future duties, should they be called upon to deal with cases involving unaccompanied migrant children.
- The theme of asylum-seeking children is addressed in a lecture on migrants, led jointly by a professor of public law and associate judge at the National Court of Asylum and a lawyer at the Paris Bar specializing in the law on foreign nationals and nationality. The topics discussed include the very real difficulties encountered by foreigners before the courts.

For professionals/Healthcare professionals/Issuing a medical certificate relating to a risk of sexual mutilation.

- Lastly, one of the collective activities offered to trainee judges and prosecutors in the class of 2025 focuses on human trafficking (criminal law aspects and care and supervision orders), based on a case concerning the exploitation of unaccompanied minors in the context of a network of aggravated robberies committed in major tourist areas of Paris.

136. In the area of in-service training, the issue is considered through the lens of the judicial treatment of unaccompanied minors. In 2026, it will be addressed in nine training initiatives:

- Semi-annual training courses to prepare for changes of position for juvenile court judges and prosecutors.
- The annual session on “Children at risk and judicial protection”.
- The annual session on “Juvenile offenders: rethinking our responses”.
- The annual session (starting in 2026) on “Unaccompanied migrant children: a challenge for care and supervision orders and criminal justice”.
- The functional grouping (starting in 2026) of youth advisers within the appeals courts.
- The annual session on “Human trafficking and procuring”, which includes a half-day session on networks that exploit minors and encourage them to commit offences. The session is open to a multidisciplinary audience comprising judges and prosecutors, court clerks, child protection professionals and internal security forces.
- The annual session on “Juvenile court prosecutors”.
- The annual session on “Civil functions of prosecutors”, which deals with the issue of foreign civil status documents.

137. In line with its international strategy, the National School for the Judiciary develops and implements intra-European training projects on high-stakes issues of common interest, with the aim of enriching the training of French judges and prosecutors through a transnational and interprofessional approach. Since January 2024, the School has been running a project (“Just Child”) on the protection of unaccompanied minors caught up in cross-border organized crime networks and, more specifically, human trafficking. In the next phase, a new project (SCHIELD) submitted in March 2025 could start in January 2026 to train a panel of trainers to better educate judges, prosecutors and protection officers on the subject of child trafficking, thus enabling a larger number of professionals to be trained according to the same standards across Europe.

138. The Just Child project, financed by the European Commission’s Directorate-General for Justice and Consumers over an 18-month period in the amount of €491,000, is being implemented by the National School for the Judiciary in conjunction with the Italian School for the Judiciary and the Professional Training School of the Bar of the Paris Court of Appeal. Its aim is to train European justice professionals (judges, prosecutors, lawyers, protection officers, investigators) from Italy, Spain, Belgium, the Netherlands, Romania, Bulgaria and the Balkans on this issue. During the first training seminar, held in Roubaix at the National Academy for Youth Protection and Juvenile Justice, 83 professionals were trained, including 42 French professionals. A total of 91 participants, including 19 French professionals, attended the second training seminar, held in Naples. The final conference, held in Paris on 15 and 16 May 2025, brought together over 100 participants, of whom one third were French professionals. The project received strong support from the Directorate for Youth Protection and Juvenile Justice of the Ministry of Justice, which was represented on the scientific committee; from the Interministerial Task Force to Protect Women against Violence and to Combat Human Trafficking; and from the other institutional actors concerned, thus ensuring wide distribution of the training materials designed for professionals and unaccompanied minors.

139. The SCHIELD project, submitted to the Directorate-General for Justice and Consumers in March 2024 as a follow-up to the Just Child project, in consultation with the Ministry of Justice (Directorate for European and International Affairs and Directorate for Youth Protection and Juvenile Justice), will involve schools in Greece, Portugal, Romania, Bulgaria, the Netherlands and Albania. Trainers of judicial staff from the participating

countries will play a central role in developing and disseminating a training module and e-learning on the subject of child trafficking. An initial training session on the topic will be delivered in each country by national trainers, who will have been prepared at a train-the-trainer seminar. Finally, the project will conclude with the adoption, by each participating school, of an action plan for the sustainable use and dissemination of the deliverables for the benefit of the largest possible number of justice professionals. The cost of the project is €517,000.

Training at the National Academy for Youth Protection and Juvenile Justice

140. The National Academy for Youth Protection and Juvenile Justice provides initial and in-service training for youth protection and juvenile justice officers and directors throughout their careers. Professionals from public service agencies are trained at the Academy.

141. Public service agencies are establishments and services that are authorized and financed exclusively or jointly by the State and/or the department. Such establishments and services are authorized to implement measures ordered by judicial authorities in civil and criminal matters. In criminal cases, measures are ordered by the judge on the basis of the Juvenile Criminal Justice Code. These structures complement the public sector, which is made up of establishments and services that report to the Ministry of Justice. The public service agency sector has three levels: federations; associations; and establishments and services. In practice, establishments and services are managed by hundreds of associations affiliated with national federations, with no hierarchical relationships.

(i) Initial training

142. Since 2022, trainee officers in the statutory training programme have been provided with training on the specific features and care of unaccompanied migrant children. This topic is addressed through the lens of human trafficking and in courses dealing with the sexual exploitation of minors.

143. In 2022/23, the 128 trainee officers taking the 18-month statutory training course attended 12 hours of training on human trafficking and unaccompanied migrant children, in addition to 3 hours of training on child prostitution.

144. In 2023/24, the topic of unaccompanied migrant children was explored in greater depth, with 14 hours of courses on dealing with such children under both civil and criminal law. A total of six and a half hours were devoted to discussing the subject of child prostitution. These courses were delivered to the 142 trainee officers in the statutory training programme. During the same period, a two-day course, totalling 12 hours of training on unaccompanied migrant children and trafficking in persons, was designed to help 20 newly appointed officers adapt to their new roles.

145. In 2024/25, three hours of training on unaccompanied migrant children were offered to the 98 trainee officers in the statutory training programme, in addition to six hours on the issue of prostitution.

(ii) In-service training

(a) Training on unaccompanied migrant children

146. Since 2022, the National Academy for Youth Protection and Juvenile Justice has offered several types of in-service training on the issue of unaccompanied migrant children. The purpose of this training is to enhance understanding of the sociological characteristics of members of this population, identify the legal and institutional framework governing their care and define specific factors for assessing the difficulties encountered in supporting them.

<i>Year</i>	<i>2022</i>	<i>2023</i>	<i>2024</i>
Dedicated hours	249	217	192
Training days	477	337	396

<i>Year</i>	2022	2023	2024
Dedicated hours	249	217	192
Number of trainees who are youth protection and juvenile justice professionals	215	94	113
Number of trainees who are not youth protection and juvenile justice professionals	0	59	59
Total trained	155	100	99

(b) Training on the issue of trafficking in persons

147. In 2023 and 2025, a number of training courses on the issue of trafficking in persons have been offered at regional training centres. In 2023, 60 hours of such training were provided to 40 professionals. For 2025, a total of 270 places will be offered for training days on this theme, with a total of 76 hours of training. On 7 October 2025, at the Hotel Rennes Métropole, the branch of the National Academy for Youth Protection and Juvenile Justice for the western region is organizing a training day on the issue of human trafficking, with live video broadcasting and presentations by the Interministerial Task Force to Protect Women against Violence and to Combat Human Trafficking and the associations Hors la Rue and Koutcha.

(c) Other events and materials

148. In addition to its training courses, for many years the National Academy for Youth Protection and Juvenile Justice has helped to enhance understanding of the specific needs of unaccompanied minors by organizing events and disseminating research. Examples include the following:

- The publication in 2025 of a research report on multilingualism, mobility and learning. The report is the outcome of a collaborative research study on unaccompanied migrant children carried out by a teacher of French as a foreign language, a teacher specializing in training on culture and basic skills, youth protection and juvenile justice officers and three linguistics researchers, in an integration unit run by the Directorate for Youth Protection and Juvenile Justice.
- In 2023 the regional training centre for the south-eastern region, located in Marseille, hosted a one-day conference on “Protection and access to rights for unaccompanied migrant children” for professionals from the Directorate for Youth Protection and Juvenile Justice and the child protection services.
- On 21 and 22 June 2022, during the French presidency of the Council of the European Union, the National Academy for Youth Protection and Juvenile Justice held a symposium on assessing the needs of unaccompanied migrant children. The symposium brought together over 180 French and European professionals to discuss the issues and practices involved in caring for unaccompanied migrant children.

Training at the learning centres for non-French-speaking students and children from itinerant and Traveller families

149. Learning centres for the education of non-French-speaking students and children from itinerant and Traveller families are academic or inter-academic support structures operating as part of an exchange and sharing network for all actors involved in the follow-up of non-French-speaking students and pupils from itinerant families. By providing advice and pedagogical support to teachers in schools and institutions, conducting training initiatives and distributing teaching materials and other resources, they facilitate the integration and support of pupils whose command of French and prior education may be varied and sometimes out of step with those of other pupils of the same age.

150. As resource and training centres, the learning centres for non-French-speaking students and children from itinerant and Traveller families provide teachers with training and specialized documentation and tools. They support administrators by providing the

information and training they need to run local programmes. Learning centres for non-French-speaking students and children from itinerant and Traveller families are involved in in-service training under the academic training plan and departmental plans. They are key partners in initial teacher training.

151. As part of the drive for greater inclusion, all education staff are involved in the learning plans developed for newly arrived non-French-speaking pupils, including unaccompanied migrant children. There are several types of training:

- Initial training.
- Locally initiated training courses, collaboration between national higher institutions of teacher training and education and learning centres for non-French-speaking students and children from itinerant and Traveller families, local intermediary staff.
- Self-paced training courses available on the M@gistère website on the theme of integration and inclusion of newly arrived non-French-speaking pupils.

152. All these initiatives are aimed at primary- and secondary-school teachers at different levels of training: from introductory materials to in-depth knowledge and teaching practices relating to these students.

Actions by the Directorate General for Foreign Nationals in France

153. Since 2019, the Asylum Directorate, in partnership with the French Office for the Protection of Refugees and Stateless Persons, UNHCR and the French Red Cross, has run 14 training initiatives on access to the asylum procedure for unaccompanied migrant children, held locally for various specialized actors from institutions and associations, such as departmental councils (child welfare services), agents at one-stop services for asylum-seekers in the prefectures, ad hoc administrators and reception and accommodation centres for asylum-seekers, reaching over 200 participants. An eight-module e-learning course on access to the asylum procedure for unaccompanied migrant children will soon be available. It addresses issues such as the best interests of the child, the problems that unaccompanied migrant children may have faced in the course of their migration history, legal representation in the asylum procedure, the specific approach to the examination of asylum applications submitted by unaccompanied migrant children, family reunification and integration.

154. The Asylum Directorate has financed training courses organized by partners specializing in the issue of unaccompanied migrant children: 12 courses were organized by the association *Thémis* (186 participants) and 15 by the Alliance of Lawyers for Human Rights (140 participants). The courses were attended by ad hoc administrators, social workers, volunteers and lawyers.

155. As part of the implementation of the European Pact on Migration and Asylum, an interministerial working group led by the Asylum Directorate and comprising several directorates of the Ministry of Justice and social ministries, as well as the French Office for the Protection of Refugees and Stateless Persons and the Immigration Directorate of the Directorate General for Foreign Nationals in France, is tackling the issue of staff training on asylum applications from unaccompanied migrant children. This training, aimed at all staff who may be called upon to work with unaccompanied migrant children, will be built around existing tools (face-to-face and online training modules, guides) developed and updated by the various ministries, and brochures on the subject produced by the European Union Agency for Asylum.

Training at the French Office for the Protection of Refugees and Stateless Persons⁸

156. As part of their initial and in-service training, examining protection officers, their supervisors and other staff of the Office receive training, some of which is now compulsory, on the main causes of vulnerability as defined in the rules governing the procedure, which

⁸ The Office's [activity reports](#) are available from the website www.ofpra.gouv.fr/en. Its publications list the training activities carried out each year for staff of the Office and its partners on causes of vulnerability, including those concerning minors. See, for example, the Office's [2023 activity report](#).

include: minor age; violence against women (domestic violence, including violence against children; forced marriage, including early marriage; and female genital mutilation, the reason most often invoked by unaccompanied asylum-seeking girls); trafficking in persons, regardless of the age of the victim or the form of exploitation; and sexual orientation and gender identity.⁹ These training courses are provided by the advisory groups established by the Office in 2013 on these five themes, which also provide training to the interpreters with whom the Office works¹⁰ and to various partner institutions and associations. Staff of the Office benefit from training modules developed by the European Union Agency for Asylum, including one on interviewing children, one on interviewing vulnerable asylum-seekers and one on trafficking in persons. The number of times that staff of the Office took part in in-service training on causes of vulnerability was 1,082 in 2022, 812 in 2023 and 566 in 2024. In addition, workshops are regularly held on the implementation of the Office's reporting obligations under article 40 of the Code of Criminal Procedure and its obligation to report situations in which children are endangered or at risk of being in danger. These obligations concern children who are victims of or at risk of domestic violence, female genital mutilation, early marriage, child abuse or exploitation in the context of trafficking in persons.

157. Asylum applications from unaccompanied minors are processed by authorized protection officers, who take compulsory training, provided by the Office's advisory group on minors, on how to interview children and adolescents and on the specific approach to processing such applications. To strengthen unaccompanied minors' access to the right of asylum, which is still poorly understood by the actors involved in child protection,¹¹ in addition to the information available in the asylum guide for unaccompanied foreign minors in France and on the pages dedicated to unaccompanied migrant children on the Office's website, the advisory groups on causes of vulnerability are involved in training initiatives for various stakeholders on asylum applications from unaccompanied migrant children (such as training courses run by the Directorate General for Foreign Nationals in France of the Ministry of the Interior, the Office and UNHCR for departmental councils and ad hoc administrators; training courses at the request of the Office's partners, such as the French Red Cross or the City of Paris). This training covers access to the asylum procedure and specific approaches to the examination of asylum applications from unaccompanied migrant children and young adults, with a particular focus on trafficking in minors, early marriage and female genital mutilation.

158. With regard to violence against women, initial and in-service training for staff of the Office covers domestic and conjugal violence, with a focus on situations of coercive control and issues of access to rights, forced marriage, including early marriage (a training course on this topic has been rolled out in 2025) and female genital mutilation. Training in this regard includes a focus on the special requirement, introduced in the best interests of the child, whereby, under articles L.531-11 and L.561-8 of the Code on the Entry and Stay of Aliens and the Right to Asylum and Order IOMV2330687A of 6 February 2024 on the implementation of these provisions, a medical certificate attesting to the absence of genital mutilation in a child applying for or benefiting from asylum because of the risk of such mutilation in the event of return to his or her country is required in order to establish the

⁹ Information on the Office's consideration of causes of vulnerability, the mandates of the five thematic advisory groups and the procedural safeguards available to vulnerable persons, regardless of age, is publicly accessible, in French and English, on the Office's website, particularly in chapter 6 of the *OFPRA Procedural Guide*.

¹⁰ Interpreters who assist in interviews conducted by the Office are employees of interpretation service providers with which [public procurement contracts](#) have been signed. In accordance with Office's Interpreters' Charter, the advisory groups on vulnerability organize training sessions for interpreters on causes of vulnerability, as required. These sessions cover, among other things, specific approaches to interviewing minors (and other vulnerable applicants) in terms of attitude, appropriate vocabulary and terms referring to intimacy and violence. Some 180 interpreters received such training in 2023.

¹¹ Relatively few unaccompanied migrant children apply for asylum each year, even though they are largely in need of international protection: in 2023, 1,350 applications for international protection were submitted to the Office by unaccompanied migrant children, most of whom were male and of Afghan nationality. Their rate of protection by the Office is 84.1 per cent (or 90 per cent including protections granted by the National Court of Asylum) (French Office for the Protection of Refugees and Stateless Persons, [2023 activity report](#)).

existence of such a risk for the purposes of processing the asylum application. Such a certificate is also required every five years, in principle, until the child reaches the age of majority, to ensure that minors granted protection on this basis remain free from mutilation.¹² This medical certificate is issued by a forensic doctor working in a forensic unit or a unit specializing in the treatment of women victims of violence, and is paid for out of public funds. The Office is involved in training organized by partners on violence against women (such as training on gender-based violence as part of initial training for panels of judges of the National Court of Asylum, and training on asylum applications based on a risk of female genital mutilation, under the 2025–2028 Plan for the Paris Region to Combat Female Genital Mutilation).

159. With regard to trafficking in persons, the Office’s advisory group on trafficking in persons runs several modules as part of the in-service training of examining protection officers and their supervisors: a module on the fundamentals of examining asylum applications related to trafficking in persons, including a focus on trafficking in minors, and a module on trafficking for purposes of labour exploitation. To bolster its own expertise, the advisory group benefits from exchanges with and training provided by specialized associations such as Mouvement du Nid, Comité contre l’esclavage moderne and Hors la Rue. The Office intervenes on asylum applications based on trafficking in persons, including in cases involving minor victims, with various partners (for example, in the delivery of the “Human trafficking and procuring” module at the National School for the Judiciary in 2023, and internal training for Mouvement du Nid in 2024).

¹² As at 31 December 2024, 24,791 girl children were under the legal and administrative protection of the French Office for the Protection of Refugees and Stateless Persons due to a risk of female genital mutilation.