

Refugee Children's Consortium

Briefing on the National Transfer Scheme, August 2017

Background

Launched on the 1st July 2016 by the Home Office and Department for Education, the National Transfer Scheme was described as a 'new voluntary transfer arrangement between local authorities for the care of unaccompanied children who arrive in the UK and claim asylum'¹. Operating through a voluntary interim transfer protocol, ('the interim protocol'),² the National Transfer Scheme aims to ensure that the responsibility for supporting these children does not fall disproportionately to a small number of local authorities situated as entry points into the UK (such as Kent and Hillingdon) and that 'there is a more even distribution of caring responsibilities across the country'.

Transfer can be triggered when the number of unaccompanied asylum-seeking and refugee children under the age of 18 in a local authority area (the entry authority) reaches more than 0.07% of the area's child population. The local authority can then request that a child is transferred to another local authority through the Home Office's central administration team. If not otherwise agreed, the local authority receiving the child will be responsible for covering the costs of transporting the child from the local authority where they entered the UK. The voluntary transfer protocol introduced new forms for local authorities to complete in relation to children they are caring for – the 'Unique Unaccompanied Child Record' (UUCR). The first of this (Part A) is to be completed for all children, regardless of whether they are entering transfer. The central administration team then aims to maintain a database of unaccompanied asylum-seeking children based on the financial receipt information submitted by each local authority and the forms associated with the transfer protocol.

Having passed its one year anniversary, the interim protocol is being reviewed. Members of the Refugee Children's Consortium (RCC) have witnessed a number of problems with the Scheme as it currently operates, and have heard of further issues directly from social workers and Independent Reviewing Officers – this paper outlines some of those problems, with a view to informing any review and ensuring that all moves only take place when they are in the child's best interests.

The following information is based on FOI requests made on locations of children (October 2016) and the views of staff in one entry area, three strategic migration partnerships and two receiving local authorities. NGOs across England who are supporting children, including the Refugee Council, Greater Manchester Immigration Aid Unit, ECPAT UK, The Children's Society and Home for Good have also shared their experiences. Most of the data is qualitative, but the RCC is of the firm view that there are significant problems with the NTS as it currently operates that need addressing.

¹ <https://www.gov.uk/government/news/government-launches-national-transfer-scheme-for-migrant-children>

² Home Office, Department for Education and Department of Communities and Local Government, Interim National Transfer Protocol for Unaccompanied Asylum Seeking Children 2016-17, at https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/534258/Interim_National_UASC_transfer_protocol.pdf

Issues with the National Transfer Scheme

1. Delays in transfer

When the transfer of children from Kent was first discussed in 2015, there was consensus that transfer should take place swiftly, with early discussions aiming for transfer to take place within 48 to 72 hours of arrival.

The interim protocol is relatively silent about timescales. It states that 'the entry local authority will make the transfer decision as soon as practicable and suitable - ideally within 48 hours (two working days) of the child's arrival in to the care of the entry local authority, although deferral may be necessary. It later states that 'the receiving local authority administration lead will as soon as possible (ideally within 1 working day of receiving [the transfer allocation] acknowledge allocation by email to the receiving regional administration lead [and] confirm transfer acceptance to the entry local authority'. Once the UASC transfer team has received a transfer request, 'it is expected that the transfer should take no more than ten working days to confirm'. There is no timeframe for how quickly transfer should take place once the receiving local authority has confirmed the transfer acceptance, although they become legally responsible for the child from that point under section 69 of the Immigration Act 2016. The draft revised protocol circulated in July 2017 retains these timeframes and makes provision for delaying a transfer in the best interests of children.

Moving a child must take account of their best interests and that this will usually include an expeditious transfer. Yet, RCC members are seeing many cases where children are not being transferred for weeks and even months. If a young person has been in a London borough or in Kent for a few weeks or more, then transfer can be very problematic, with the young person very resistant to being moved. Many referrals are taking place when the child has been in the entry local authority for over a month. In one case, a young person had been in the entry local authority for over a month and had already been moved three times. Having been with a foster family for two weeks he was extremely upset about the prospect of moving a fourth time. We have had examples of children saying they will not move, or that they will harm themselves if moved. In one case, the young person moved was so distressed that they began self-harming, and the receiving local authority had to do a 'deal' with the sending local authority so that he could be returned.

One issue may be that while certain regions have a good system in place, not all do and this is resulting in difficulties with making referrals from London and the South East. Authorities with lower number are prioritising transfers within region. Even where a receiving local authority is found there may still be delays in the physical transfer of a child. In one case we looked at, the transfer was requested within the 48 hour time frame, but although the child was told he would move, there was no confirmation about which area would be able to take him for two months. Once the area was confirmed, it took a further two weeks before a foster carer was found. This meant that although he was aware he would be transferred, the young person was unable to prepare because he did not know when or where this would take place.

It is difficult to examine exactly where delays are taking place, and whether in each case they are occurring at the same point, or if it is an amalgam of different factors:

- Entry local authority either requesting transfer or sending information outside 48 hour timeframe
- Home Office making contact with Strategic Migration Partnerships
- SMPs then making contact with potential receiving local authorities, and those local authorities responding about whether spaces are available.
- Physical transfer of child from entry to receiving local authority

What is clear is that in a significant number of cases, transfer is not taking place within a child's best interests timeframe. In one authority, no transfers were known to have taken place in a two week time frame since November 2016. Where young people were transferred, the majority were between 2-3 months or 3-4 months from arrival to transfer. A minority of cases took 5-6 months, with some cases still awaiting transfer after 6 months. Delays have resulted in disruption of education, legal advice and support that was being provided.

There has been confusion regarding transfer timescales, which could result in delays being perceived as longer than they are. In Kent, there are a number of children who transferred prior to 1st July who transferred on voluntary arrangements and may have been in Kent for up to six months prior to moving but still had a strong desire to leave. In one local authority area that acted as a receiving local authority, the majority of children were received within two weeks of the area notifying that they were able to accommodate them.

Two local authorities had experienced cases when ultimately the child was not moved. In one it had been apparent that the child was never going to be able to move, and after six weeks this was agreed. The outcome was described as good, but not the process. In the other case transfer was stopped after the involvement of the young person's solicitor. The young person had threatened to commit suicide if moved and had a history of self-harm.

A key issue seems to be the lack of clarity for social workers and IROs as to what should happen in relation to the NTS when a delay results in the entry local authority deciding that the transfer is no longer in the child's best interests, usually due to the lack of actual physical transfer in the expected timeframe and the child becoming settled.

2. Delays in access to services and lack of available services

When the transfer scheme was originally discussed, in March 2015, the Home Office committed to 'looking at access to legal aid as a priority and availability of specialist services'.³ However, this remains an issue. The lack of available legal advice is a common concern throughout most receiving authorities. Within a number of regions, there are very few legal aid solicitors for asylum and capacity to take on a large batch of new cases quickly. These cases will require legal advisers who are accredited to level 2 under the IAAS scheme – this further limits the number of legal advisers available for these complex cases. It also means that there will be further requirement for community care solicitors and public law contract solicitors – for legal advice in relation to age assessments, welfare issues and judicial review of trafficking decisions. Again, there is a lack of legal aid solicitors in these areas.

³ Discussed in the National Asylum Stakeholder Forum Children's Subgroup on 29 March 2015

In the East of England, for example, the lack of legal aid providers is particularly acute. Waits of two or three months for an appointment with a lawyer are not uncommon – in more than one case, the young person had to wait for four months. This inevitably delays the progress of their asylum claim, which can have extremely negative effects on their mental health and causes difficulties in care planning. By October 2016, there had been 59 transfers to Devon, however the only legal advice for immigration and asylum available for the whole county is in Plymouth, raising significant issues about capacity.

Access to legal advice is not solely a problem for those undergoing transfer, but the significance should not be underestimated. To accommodate delays in accessing a legal representative, the Home Office has introduced flexibility with the deadline for completing the SEF,⁴ extending this to 60 days. For those who are 17, or even 16 years old, delays and timescales are particularly crucial as they can result in the young person ‘ageing out’ and/or not being appropriately cared and planned for. It can also make a significant difference to their asylum claims, as there are different considerations for a young person’s risk on return as under 18 or over 18. With delays of months not uncommon, this can lead to young people having their asylum interview and decision made after they are 18 and at a higher prospect of being refused protection. With delays already an issue in the asylum decision making process (RCC members have worked with a number of young people who have seen delays between their interview and decision of around one to two years, by which time they are over 18) the NTS has in some cases led to further delays in a child’s asylum claim.

There is an additional concern in relation to the availability of interpreters to attend legal appointments in transfer areas. In one area in the North East, interpreters were required to travel from London which meant that costs of an interpreter were for a full day, even for a short appointment and that in many cases finding an interpreter willing to make a 2-3 hour journey was extremely difficult. This had an impact both on access to legal advice and the local authority’s ability to communicate with the child.

In several areas, concerns were raised about the appropriateness of transfer to meeting the cultural and religious needs of children. One receiving local authority said that the area lacked a diverse population, and therefore there was no one to speak the child’s language, or where the foster carer could buy food. There was also not a mosque near to where the child had been placed. This was echoed in the sending area, where a child had begun visiting a temple in London and was then moved to the South-West where there was no temple for them to attend.

Foster carers in various regions reported a lack of training and awareness around child trafficking, cultural values, the effects of trauma and its behavioural manifestations on this group of young people. Even though, Refugee Council and ECPAT UK delivered foster carer and support worker training nationally to 1,230 (average of 85 individual and group requests fulfilled) participants funded by the Department for Education, there are still 257 pending requests from both Local Authority and private Fostering Agencies (groups and individuals) requesting training.

At least one NGO raised the issue of the paucity of mental health services in some areas. While access to CAMHS is a near universal problem, in certain areas access to additional support proved

⁴ Discussed in the National Asylum Stakeholder Forum Children’s Subgroup on 14 December 2016

difficult. Access to ESOL provision has also been raised as a concern. Access to services can be further complicated by delays in proper care planning (see section 4 below).

3. Children and carers are not adequately informed and/or prepared for transfer.

Young people and their foster carers are often unaware that they are in the scheme. The only indication seems to be when young people are being told not to apply to go to school and are not assigned a social worker. Many of these children are also not provided with an interpreter or independent advocate. In one case, a child in foster care was only told they were being transferred two hours before departure. This has caused a lot of fear and uncertainty about transfer – to some young people it feels like a punishment.

In some areas foster carers are apparently routinely told the child might be transferred and then receive little information as to whether or not a decision has been made to put the child for transfer and/or decide that the child would stay in the placement. This exacerbates the many challenges facing carers and children in making relationships and settling in.

Foster carers have also expressed concerns about children being taken to them under NTS at very short notice. In one case, it took a week to get access to language line so they could actually communicate with the young person. Some RCC members find it difficult to track young people once they have been moved.

In two separate cases, foster carers reported children arriving with a few hours' notice to their placement, with no local authority social worker present, and no interpreter, or access to a telephone interpreting line, so the child could be informed about the foster carers' role or who they were. These events present as a safeguarding risk, it is known that children who are not given information on the nature of their placement are at risk of going missing from care. In one case, the foster carer stated:

'My husband and I have experience of fostering unaccompanied children and are pretty convinced that he will go missing once a new placement is found'.

Numerous concerns were raised by foster carers who received children under the NTS around the lack of support and lack of training on the care of unaccompanied children that they, as well as their supervising social workers, had received. Many reported that the child's social worker lacked knowledge and understanding on the key process affecting this group of children, particularly immigration and asylum procedures. In a number of cases where children were transferred, they had been screened in Croydon prior to transfer. Concerns were raised about whether they had legal advice prior to this, and what had happened to any notes.

Many transfers are into urban areas, and one way of helping to prepare children for moving is to put together packs about different cities – Kent has been doing this. In the East of England, authorities are intending to start using Syrian resettlement city packs.

4. Impact on social work practice

The effective functioning of the NTS may be being undermined by the perceived relationship between the Home Office and local authorities. In one case the young person was desperate to stay

in the entry local authority with his foster carers but was told that the entry authority was 'full up' and that 'immigration law stats that he has to move'. This is not the case and social workers should not feel that once transfer has been initiated that they are unable input and request that the transfer is halted if it is no longer in the best interested of the child. The protocol should be clear that best interest assessments should be undertaken on an ongoing basis and that social workers should actively review the process.

It is also important that the 'Unique Unaccompanied Child Record' is not perceived as a 'stand in' for a proper care plan while an entry authority is waiting for transfer to be facilitated, especially in light of lengthy delays. Complete files must travel with the child to the receiving local authority, and this is not happening in every case.

5. Age assessments

The mechanism for a local authority to provide its observation of the young person's age appears to be the 'Unique Unaccompanied Child Record' (UUCR) which is annexed to the Protocol. Described as 'reception information', the entry authority is required to complete and submit the UCCR "*in respect of each unaccompanied child who begins to be looked after, and submitted promptly by the local authority to (central admin team email address)*".

The UUCR is submitted in all cases, whether or not the entry local authority wishes to transfer the young person elsewhere or retain responsibility for them. Regarding the applicant's age the UUCR asks: "*Does the young person have any documents to support their stated age and nationality? Does this young person require an age assessment? If so, what is your observation of his/her likely age?*" (emphasis added). This is not requesting a formal age assessment and it is unclear how the Central Administration Team use the information in respect of transfer or decisions on treating the applicant as 'significantly over 18'. Entry authority 'observations' will not meet the criteria of a lawful assessment and reliance by the Home Office on such 'observations' are also likely to be unlawful and would breach current policy under the *Assessing Age* instruction which require evidence that any age assessment from a local authority is case-law compliant.

The protocol states that 'Where the age of a child is disputed (but accepted as being under 18 years of age) a Merton compliant age assessment will be conducted by the entry local authority if the unaccompanied child is not transferred or the receiving local authority if they are transferred.' A problem arises when the entry local authority perceives that the child *might* be over 18. In one case, the entry authority thought the child was over 18 but wouldn't assess because they were hoping to transfer, but it was too far for the receiving authority to send two social workers to conduct an assessment, so the young person was left in limbo. Similarly, one local authority and SMP in the same area said that they would not accept a transfer request where there was a doubt about age.

This places children who are disputed as potentially over 18 in a double bind. They must first go through an age determination procedure, which may take months and if found to be under 18 are then moved away under transfer having already spent a considerable period of time in the entry local authority. The delay in these cases is in-built, and entry local authorities are those which by their nature will have a large number of children to assess.

6. Contact with relatives and family members

Children may have family members or relatives in the UK. In some cases, children are brought to the UK under the provisions of the Dublin III Regulation that provides for the reunification of unaccompanied asylum seeking children with family members or relatives, where it is in their best interests. If a child is reunited with relatives, then they must be able to care for the child, although there are instances where these placements breakdown. Where a child is joining a family member (sibling or parent) then there is no requirement that they live together. This has given rise to confusion about whether these children should be part of the NTS. There are strong best interests principles that they should remain in the same area as a family member. The Care Planning, Placement and Case Review statutory guidance requires a local authority caring for a child to facilitate contact with parents and siblings. Where a placement with relatives breaks down, it is also likely to be in a child's best interests that they remain in the local authority where they have been living, rather than being entered into the NTS.

In addition, there are children who enter the UK clandestinely but who have family relationships in the UK. The transfer form does encourage information about these family members to be shared but this does not mean that children will be moved closer to their family members. In one case, a child with an older care-leaver sibling in West London was moved to Wiltshire. He was told that contact would continue, but that it was for his older brother to arrange. This places an unacceptable financial burden on a care leaver, and increases distress and mental health difficulties to the younger sibling who has been moved away.

Where contact with a family member or relative, or a move to be near them is assessed as not being in a child's best interests, an adequate explanation is required for these children.

7. Funding

There are concerns that the true cost of supporting those unaccompanied children in the receiving authority is not met by the Home Office funding through the voluntary scheme.⁵ This means that local authorities are having to fund places out of their already stretched resources, in particular the additional costs around travelling to legal advice, or paying for interpreters. It also does not include the support provided by local organisations and support services that have had to provide support where there has been a delay or lack of services in the local area. Some local authorities have estimated that the Home Office funding is only meeting around 50% of the true costs of supporting an unaccompanied child under the NTS.

8. Expansion of the scheme

The enabling regulations under section 73 of the Immigration Act 2016 for the National Transfer Scheme to be rolled out to the devolved nations of the UK have yet to be laid. Whilst no detail was provided in the Act for how the scheme would operate in Scotland, Wales and Northern Ireland, the legislation was explicit that no powers would be conferred on Ministers in these countries.

⁵ For a detailed overview of the funding shortfall see East Midlands Councils, 'Analysis of Local Authority costs incurred in support of Unaccompanied Asylum Seeking Children in the East Midlands', July 2017, at http://www.emcouncils.gov.uk/write/828_Analysis_of_LA_Costs_-_July_2017.pdf

The briefing identifies significant issues surrounding the provision of legal advice, ESOL, mental health care, and interpreting services to young people in England. In Scotland, all of these matters are devolved to the Scottish Government and not within the competence of local authorities. Furthermore, unaccompanied asylum-seeking children in Scotland are treated as looked-after and the Children and Young People (Scotland) Act 2014 Act now substantially extends their entitlement to aftercare support as care leavers. Unaccompanied asylum-seeking children also benefit from the provision of a guardian (s.11 Human Trafficking and Exploitation (Scotland) Act 2015). As such it is essential that the Home Office work directly with the Scottish Government to ensure that the transfer scheme is appropriately resourced and planned if young people are to be transferred outside of England to other parts of the UK.

Recommendations

Ensuring that the best interests of children lies at the heart of the National Transfer Scheme

Social Workers are entrusted with making the decision as to whether or when to transfer. These decisions should be made on the basis of the best interest of the child. The 0.07% formula is a way of working out how to share responsibility but must not override the best interests of a child who may need to remain in, or move to, a particular area to meet their needs.

- A best interest assessment should be clearly stated as an ongoing process. Where there is delay in the transfer, the decision to transfer should be reviewed. The need to for ongoing assessment should be clearly signposted to social workers in the protocol and accompanying communications. The following paragraph could be usefully included in the protocol:

‘Social workers are responsible for reviewing the decision if a transfer has not taken place. Weekly reviews of the decision may be necessary to ensure that the decision to request transfer remains in the child’s best interests. If a child has not been transferred in 20 days a more formal review of the care plan should take place, in line with statutory guidance’

- Repeated reference to the possibility of social workers needing to defer transfer may work to undermine the need for expedient transfers. There may be some cases where delay is in the best interest of the child but the research of the RCC indicates that more often it is transferring children after a period of delay, which undermines a child’s best interest. Statements about the possible need to defer transfer for the best interest of the child should follow from a clear indication that it would normally be in the best interest of the child to transfer before they develop ties in the entry local authority.
- Where a decision is taken to transfer a child, then the entry local authority should continue to provide assistance to the child until the transfer has taken place. This includes all the statutory duties in section 22 Children Act 1989 and the Care Planning, Placement and Case Review Regulations 2010. The regulations and accompanying guidance include the obligation to prepare a care plan within ten days of placement, health-checks, the appointment of an IRO and independent visitor and timescales for these provisions. It is important that the care of a child is not distinguished by the imminence of their transfer, and that they continue to have access to the same services and support as all other looked after children.

Revisions to the NTS Protocol

The draft Interim Transfer Protocol contains some positive inclusions, including the embedding of trafficking guidance throughout the protocol increases the safety of these children. However, the protocol itself is quite unclear and a complex document to read, which increases the likelihood of errors, misunderstandings and missed time targets. Some of the most important information is captured in annexes, such as information on the best interest of the child.

- The protocol must include clear references to the ongoing need for best interest considerations so social workers are clearer about their ongoing role within the process and to ensure that in the event of delays, decisions to transfer are reviewed (see above).
- It should be explicit throughout the protocol that an expedite transfer will usually be in the best interest of the child.
- The protocol should provide a flow chart with clear steps and timelines to ensure that all parties are clearer about the transfer process, their responsibilities and any timelines.
- The revised protocol should make it much clearer that all the child's needs must be taken into account including keeping together peer relationships /friendships, as these bonds have frequently become deep and powerful, especially in the absence of family members. If the transfer is to be successful and minimise the risk of children going missing or leaving placements or struggling with mental health problems, then care should be taken to keep groups of children who are related or who are friends together where this is in their best interests. This requires a more detailed approach to the initial transfer request.
- The UUCR needs wholesale revision. At present, it is a form which purports to assess social care needs in relation to transfer but instead focuses on asylum-related questions, which are inappropriate to ask at this stage, not relevant to the care planning process, and which have the potential to re-traumatise children and jeopardise their asylum claim.

Improving implementation of the National Transfer Scheme

Many of the issues raised in this briefing relate to social work practice, and some of the issues highlighted apply in a more general sense to young people in the care system. It is hoped that the revised statutory guidance Department for Education guidance on unaccompanied children will strengthen the protection of this group and help ensure that social workers are clearer about their duties and how best to provide support. This guidance will more likely improve practice if complemented by adequate funding and high quality training for social workers in the local authorities to which these children are transferred.

In addition, information in the National Transfer Protocol and further communication to Directors of Children's Services on the following issues may help ensure that the National Transfer Scheme functions well and in the best interests of children:

- Ensuring that a best interests assessment is an ongoing process and in the event of delay or changes of circumstances, transfer is not pursued where it would not be in the child's best interests and that a clear decision is made that is understood by all affected parties.
- Ensuring that social workers are clear that they are the drivers for deciding if a transfer should go ahead or be halted at any time, and in the event of delays will want to review the decision to transfer to ensure it is still in the best interests of the child. Ensuring that the

completion of the UUCR does not take the place of a care plan and that even if waiting for transfer children have access to the support and services they need

- Adequately preparing children for transfer, including keeping others working with the child informed, including foster carers, youth workers etc.

Availability of legal advice

- The Home Office should, through strategic migration partnerships, review the availability of legal advice in transfer areas on an ongoing basis.⁶
- The Legal Aid Agency has considered issuing an Expression of Interest for existing providers in transfer regions so that they might be able to take on more matter starts, increase capacity and help deal with demand in that area. The RCC would recommend that this takes place as a matter of urgency.
- While legal provision does not exist in every location to which unaccompanied children are transferred to, the LAA is able to encourage outreach by removing barriers facing legal providers looking to take on cases from further afield, such as the cost of travel. The RCC recommends that the LAA communicates widely and quickly about how controls can be relaxed.

Publication of data and review of the scheme

- It is important that the scheme does not become embedded without an assessment of whether it is functioning as planned. This requires information that it is both alleviating the pressures on entry local authorities caring for large numbers, and that the scheme is operating in a child's best interests. Robust data should be collected on transfer timescales, the age of children at transfer, and potential impact on asylum claims. A year on, the RCC would strongly encourage an independent assessment of the National Transfer Scheme and for the setting of standards by which the scheme will be assessed on an ongoing basis.
- There should be ongoing monitoring of the scheme while it remains voluntary, and an evaluation which can demonstrate its value and ongoing purpose. This is particularly important in light of the withdrawal of some local authorities from the scheme.⁷
- Information on the locations for transfer, shared between government departments and relevant NGOs, will enable those who provide services to this group of children and young people to plan their activities and develop better responses to children who are transferred. For example, the East Midlands Strategic Migration Partnership costs report highlights the important work undertaken by NGO partners to provide welcome groups, orientation and other forms of support.⁸ Better information sharing would enable organisations to secure ongoing funding, given that charitable trusts often provide funds in advance and for up to three years. If a sustainable support network is to be built around groups of young people and children, then the communities where they are living need to be given as much information as possible in order to plan this.

⁶ Meeting with the Home Office & Legal Aid Agency, 1 March 2017

⁷ <http://www.nottinghamshire.gov.uk/DMS/Document.ashx?czJKcaeAi5tUFL1DTL2UE4zNRBcoShgo=2FY0EGizvWYeF%2F5wiwEvhlMRqv37Y9o%2FnHMxkhScH%2BMDJG0pt594lg%3D%3D&rUzwrP%2BZ3zd4E7lkn8Lw%3D%3D=pwRE6AGJFLDNlh225F5QMaQWctPHwdhUfCZ%2FLUQzgA2uL5jNRG4jdQ%3D%3D&mCTIbCubSF>

⁸ East Midlands Councils, 'Analysis of Local Authority costs incurred in support of Unaccompanied Asylum Seeking Children in the East Midlands', July 2017

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The Refugee Children's Consortium (RCC) is a group of NGOs working collaboratively to ensure that the rights and needs of refugee and migrant children are promoted, respected and met in accordance with the relevant domestic, regional and international standards.

Members of the RCC are:

Action for Children, Asylum Aid, Asylum Welcome, AVID (Association of Visitors to Immigration Detainees), Bail for Immigration Detainees, BASW (The British Association of Social Workers), Become, Cambridge Refugee Resettlement Campaign, CARAS (Community Action for Refugees and Asylum Seekers), Children and Families Across Borders, Children England, Child Poverty Action Group, Children's Rights Alliance for England (CRAE), The Children's Society, CoramBAAF Adoption and Fostering Academy, Coram Children's Legal Centre, Coram Voice, Doctors of the World UK, DOST, ECPAT UK, Family Rights Group, The Fostering Network, Freedom from Torture, Gatwick Detainees Welfare Group, Home for Good, Hope for the Young, The Immigration Law Practitioners' Association (ILPA), JCORE (Jewish Council for Racial Equality), Kent Refugee Action Network, Law Centres Network, Love to Learn, Medical Justice, Islington Law Centre, National Children's Bureau, NSPCC, Project 17, Project for the Registration of Children as British Citizens (PRCBC), RAMFEL, Refugee Action, Refugee Council, Refugee Support Network, Royal College of Paediatrics and Child Health, Scottish Refugee Council, Student Action for Refugees (STAR), The Trinity Centre, Welsh Refugee Council, UNICEF UK.

The following all have observer status:

Barnardo's, The British Red Cross, Office of the Children's Commissioner (England), Save the Children UK, UNHCR