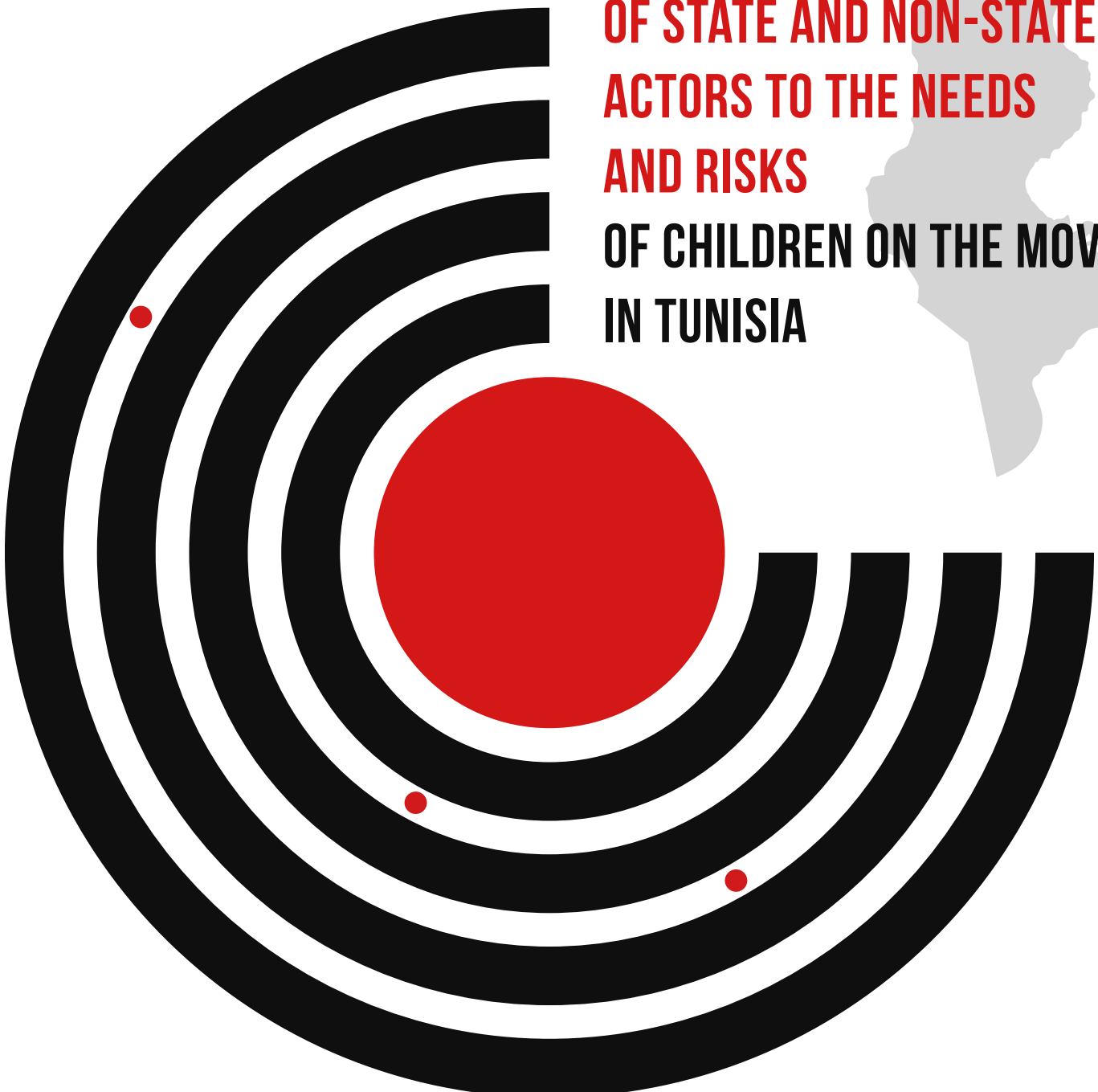


5 FOCUS BRIEF

**CAPACITIES AND RESPONSES
OF STATE AND NON-STATE
ACTORS TO THE NEEDS
AND RISKS
OF CHILDREN ON THE MOVE
IN TUNISIA**





FOCUS BRIEF 5

CAPACITIES AND RESPONSES OF STATE AND NON-STATE ACTORS TO THE NEEDS AND RISK OF CHILDREN ON THE MOVE IN TUNISIA

NOVEMBER 2024 - APRIL 2025



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LIST OF ACRONYMS

AVRR	Assisted voluntary return and reintegration
BID	Best Interest Determination
CAT	United Nations Convention against Torture
CDIS	Center for Social Integration
CEOS	Center for Social Guidance and Counseling
CRC	Committee on the Rights of the Child
CIJE	Integrated Center for Youth and Children
CPE	Child Protection Code
CPSE	Child Social Protection Center
CRT	Tunisian Red Crescent
CSO	Civil Society Organization
CSOE	Social Center for the Observation of Children
DCIM	Directorate for Combating Illegal Migration (Libya)
DGFE	General Directorate of Borders and Foreigners of the Ministry of the Interior
DGPE	General Delegate for Child Protection
DPE	Child Protection Officer (Délégué à la Protection de l'Enfance)
FGD	Focus Group Discussion
GBV	Gender-based violence
HRD	Human Rights Defender
ICRC	International Committee of the Red Cross
IMO	International Maritime Organization
INLCTP	National Authority to Combat Trafficking in Persons

INPT	National Instance for the Prevention of Torture
IOM	United Nations International Organization for Migration
ITS	Informal Tented Settlement
KII	Key Informant Interview
MRCC	Maritime Rescue and Coordination Centre
MAS	Ministry of Social Affairs
ME	Ministry of Education
MENA	Middle East and North Africa
MFES	Ministry of Family, Women, Children and Seniors
MI	Ministry of the Interior
MJ	Ministry of Justice
MS	Ministry of Health
NGO	Non-governmental organization
OHCHR	Office of the United Nations High Commissioner for Human Rights
OMCT	World Organization Against Torture
RSD	Refugee status determination
SOP	Standard Operating Procedures
SAR	Search and Rescue
SSA	Stability Support Apparatus (Libya)
SRH	Sexual and reproductive health
UN	United Nations
UNHCR	United Nations Refugee Agency
UNICEF	United Nations Children's Fund

METHODOLOGY

The OMCT's monitoring and research during the period under analysis (November 2024 - April 2025) is based on:

- An in-depth analysis of reports and communications from international organizations, non-governmental organizations and national and local associations on the rights of people on the move, with a special focus on children on the move.
- The extensive documentation of publicly available secondary data, including the analysis of videos, images, GPS coordinates, satellite images and written testimonies, which have identified episodes of violations during the period under analysis.
- Semi-structured interviews and focus groups with:
 - 32 representatives of 18 international, national and local non-governmental organizations (based in Tunis, Sfax, Zarzis, Médenine, Sousse and Le Kef) assisting children and people on the move
 - 23 representatives and social workers from six international organizations (including the United Nations¹) and cooperation agencies working on migration issues in Tunisia
 - 7 experts who have worked or are currently working in the public child protection and health sectors in Tunisia
 - 6 lawyers who have represented children on the move before Tunisian courts
 - 4 independent activists, researchers and journalists
- Documentation of 40 individual cases of victims assisted by the OMCT and partner organizations (including 12 cases documented directly by the OMCT and its SANAD program for direct assistance to victims of torture, and 28 by partner organizations).
- A quantitative analysis of the databases of four organizations that provided direct assistance to people on the move in Tunisia over the study period.

Several limitations inherent in documenting human rights violations suffered by people on the move - particularly children - make it difficult to obtain reliable quantitative data, such as, among others: the difficulty of documenting violence suffered by children in a secure and ethical manner, the constant mobility of alleged victims, the juxtaposition of different migratory flows over the same period and on the same routes, the cross-border nature of the violations suffered by people on the move, and the difficulty of accessing the areas of alleged violations. However, after conducting a detailed study and verifying the typology, incidence and prevalence of violations on Tunisian territory, the report presents conclusions on the qualitative dimension of these violations in terms of patterns and consequences on individuals, their families and their communities.



INTRODUCTION

Millions of children on the move every year take regular and irregular migration routes, for a multitude of reasons, accompanied or unaccompanied by their families or other adults. Migration is cyclical and continuous, and a child's administrative or refugee status may change several times along the way. These children, who are exposed to risks and violations of their rights along migratory routes, have the same rights as all other children, regardless of origin or status, including the right to protection from situations of risk.¹

«Children in the context of international migration are first and foremost children, who enjoy the same human rights as all other children, rights that do not cease to apply once a border is crossed».

Rapporteur Spécial de Nations Unies sur les droits de migrants²

This Focus Brief concentrates on the capacities and responses of state and non-state actors to the needs and risks of children on the move. The report begins by briefly describing the Tunisian state system for protecting *all* children in need of protection, providing an overview of the roles and responsibilities of state authorities responsible for preventing and responding to situations of danger. The second part focuses on the weaknesses of the protection system in caring for *all* children in at-risk situations³ as they emerge from the study carried out by OMCT: far from being an exhaustive assessment of the system,⁴ this section aims to detail shortcomings in the response and capacities influencing access for all children at risk. The third section looks more specifically at the challenges facing children on the move when they come into contact with the protection apparatus, based on OMCT's in-depth exchanges with experts and practitioners, as well as with families and children on the move. OMCT concludes that there is a clear reluctance on the part of Tunisia to extend the rights of children at risk to children on the move, condemning the latter to sporadically benefit from temporary and mediocre alternative care and assistance measures to meet imminent basic survival needs, while completely depriving them of secure and dignified medium- to long-term pathways and opportunities.

1. See **Conclusion No. 107 (LVIII): Children at Risk - Adopted by the Executive Committee (2007)** | Refworld

2. Report of the Special Rapporteur on the Rights of Migrants, «Children are Children: Protecting the Rights of the Child in the Context of Migration», July 22, 2024, §2.

3. **UNHCR Conclusion No. 107 adopted by the Executive Committee (2007) on children at risk** provides operational guidance on the core elements of child protection, the identification of children at risk, and prevention, response and solutions.

4. OMCT was unable to meet official representatives of the Ministry of Social Affairs, the Ministry of Family, Women and Children and Senior Citizens, or the Ministries of Justice and the Interior. Furthermore, the absence of publicly available data on budgets allocated to protection services, places available in public centers, the number of cases of children taken into care by protection services, family and juvenile justice prevent an exhaustive analysis of the State's response, its capacities and the system's shortcomings.

The best interest of the child

What does international law say?

The best interest of the child is a fundamental principle of international children's law. The International Convention on the Rights of the Child (ICRC) states that «*in all actions concerning children, whether undertaken by public or private social welfare institutions, courts of law, administrative authorities or legislative bodies, the best interest of the child shall be a primary consideration.*»⁵ This dynamic principle must be adapted to the specific context and serve as cornerstone for the implementation and interpretation of all children's rights.⁶ There is therefore no exhaustive definition in international law of the principle «best interest of the child», since it depends on multiple individual circumstances, including the child's age, level of maturity and environment.⁷

The best interest of the child must guide decisions on separation from the family environment⁸ and alternative care.⁹ The Convention on the Rights of the Child expressly requires states to grant unaccompanied children «*special protection and assistance*», and refugee and asylum-seeking children the right to «*appropriate protection and humanitarian assistance to enable them to enjoy*» all the rights conferred on them by international law.¹⁰ The best interest of the child, as emphasized by the Committee on the Rights of the Child (CRC) in its General Comments, take precedence over non-legal arguments such as those relating to the general control of migration.¹¹

And in Tunisian law?

The best interest of the child is enshrined in several fundamental texts in Tunisian law, notably the Tunisian Constitution of 2022 and the Child Protection Code.¹³ Article 4 stipulates that «the best interest of the child must be a major consideration in all measures taken with regard to the child by the courts, administrative authorities, or public or private social welfare institutions».

5. Art. 351 of the International Convention on the Rights of the Child (CRC).

6. Committee on the Rights of the Child, General Comment no. 14 (2013) on the right of the child to have his or her best interest a primary consideration, CRC/C/GC/14, §1.

7. **UNHCR, UNHCR Guidelines on Formal Determination of the Best Interests of the Child, 2006.**

8. Art. 9 CRC: «*States Parties shall ensure that the child shall not be separated from his or her parents against their will, unless competent authorities decide, subject to judicial review and in accordance with applicable law and procedures, that such separation is necessary for the best interests of the child.*»

9. Art. 20 CRC: «*Every child who is temporarily or permanently deprived of his or her family environment, or who in his or her own best interests cannot be allowed to remain in that environment, has the right to special protection and assistance from the State.*»

10. Art. 22 of the CRC: «*States Parties shall take appropriate measures to ensure that a child who is seeking refugee status or who is considered a refugee in accordance with applicable rules and procedures of international or national law, whether unaccompanied or accompanied by his or her parents or by any other person, shall receive appropriate protection and humanitarian assistance in the enjoyment of his or her rights under the present Convention and other international human rights or humanitarian instruments to which the said States are Parties.*»

11. Committee on the Rights of the Child, General Comment no. 6 (2005), Treatment of unaccompanied and separated children outside their country of origin, §86.

12. Art. 52 of the Tunisian Constitution.

13. CPE, Law n°95-92 of November 9, 1995.

1. THE CHILD PROTECTION SYSTEM FOR CHILDREN AT RISK

This section aims to provide a brief overview of the system for prevention, early identification, care and follow-up of all children considered to be *at risk*.¹⁴ The child protection system¹⁵ comprises the following elements: human resources, funding, legislation and policy, governance, monitoring and data collection, protection and care services and care management. It is made up of different actors: children, families, communities, and staff working at local, national and international levels. This section focuses on (I) the main authorities governing this system; (II) the structures offering alternative care solutions; and (III) case management procedures.

1.1 Institutions involved in child protection in Tunisia

The ministries involved in the protection of children at risk or victims are:

- The Ministry of Social Affairs (Ministère des Affaires Sociales - MAS) - in charge of combating the structural causes of poverty and exclusion among children,¹⁶ through the body of social workers,¹⁷ developing programs for children in conflict with the law and setting up the modalities inherent in social reintegration, and developing programs for children and young people in schools.¹⁸
- The Ministry of women, children and elderly (Ministère de la Famille, de la Femme, de l'Enfance et des Séniors -MFFES) - in charge of immediate prevention of situations of danger.¹⁹ Child Protection Delegates (Délégués à la Protection de l'Enfance) report to the MFFES.²⁰
- The Ministry of the Interior, through the Brigade Spéciale pour la Protection des Mineurs (Special Brigade for the Protection of Minors) and units specializing in combating violence against women and children.²¹

14. Art. 20 of the CPE describes difficult situations threatening the child's health or physical or moral integrity. Article 35 of the CPE stipulates that the child protection officer must assess whether a difficult situation threatening the child's health or physical or moral integrity exists, as defined in article 20 of the CPE.

15. Child protection is a generic term used to describe efforts to ensure the safety of children. UNICEF uses the term «child protection» to refer to measures to prevent and respond to violence, exploitation and abuse against children. See also FHI360, Child protection basics, 2012.

16. The MAS provides direct social assistance, for example (see the section on social protection in Tunisia).

17. See art. 2 of Decree no. 2013-304 of January 11, 2013, establishing the special status of the body of social workers of the Ministry of Social Affairs.

18. See art. 5 of Decree no. 2005-2978 of November 8, 2005, setting out the remit of the Ministry of Social Affairs, Solidarity and Tunisians Abroad.

19. From 2010 to 2017, the Ministry of Social Affairs was responsible for the majority of child protection spending, with an average of 75% of total spending on child protection.

Since 2018, the Ministry of Family, Women, Children and Seniors has been the main contributor to child protection in 2020, with 56% of total spending on child protection. The main child protection program is the «childhood» program, managed by the Ministry of Family, Women, Children and Seniors (MFFES). See Ministère des Finances, UNICEF, Analyse budgétaire de la protection de l'enfance : période 2010-2020, 2024

20. This administrative body, created by the CPE in 1995, is specially dedicated to the protection of children at risk and present in each governorate headed by the Délégué Général de la Protection de l'Enfance (DGPE), see CPE, art. 30. «The Child Protection Delegate is charged with a mission of preventive intervention in all cases where it appears that the child's health or physical or moral integrity is threatened or exposed to danger due to the environment in which he or she lives, or to activities or acts he or she performs, or due to the various forms of mistreatment he or she undergoes, and in particular in the difficult situations set out in article 20 of the present code.»

21. At the time of finalizing this report (September 2025), there are 58 units under the General Directorate of the National Guard and 70 units affiliated to the General Directorate of National Security.

- The Ministry of Justice (Ministère de la Justice - MJ), through the Family Judge²² and the criminal juvenile judge.²³
- Ministry of Health (Ministère de la Santé - MS).
- Ministry of Education (Ministère de l'Éducation - ME).

Specialized institutions play a key role in the protection of children at risk / in need of protection, such as:

- The National Authority to Combat Trafficking in Persons (Instance nationale de lutte contre la traite des personnes (INLCTP) under the aegis of the Ministry of Justice.
- The Commission of children rights under the Human rights Commission (Commission des droits de l'enfant) of the Instance des droits de l'Homme, not operational at the time of finalizing this report (September 2025).
- The National Observatory of children rights (Observatoire national des droits de l'enfant), under the supervision of the MFFES, responsible for collecting, analyzing and disseminating data on children's rights, and carrying out research to assess their implementation. It contributes to the development of public policies on children, facilitating coordination between the institutions concerned and proposing measures to improve the situation of children.²⁴

1.2 Procedures for the care and protection of children at risk

The diagram below aims to give an overview of the protection pathway established by law, highlighting the roles and responsibilities of each institution in theory: ²⁵

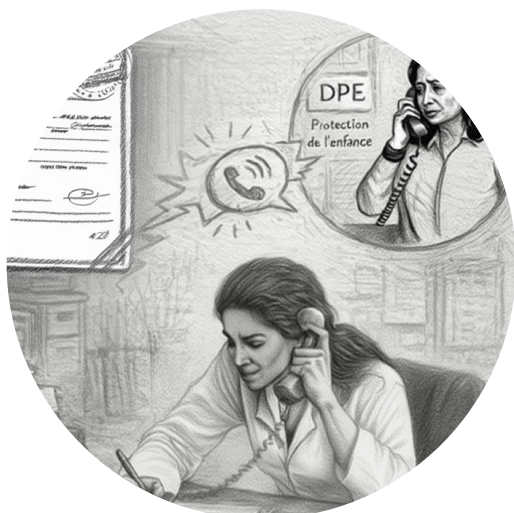
22. See CPE, chapter II on judicial protection.

23. See CPE, chapter III on the protection of children in conflict with the law.

24. **Observatoire des Droits de l'Enfant, Présentation.**

25. MFFES, Les Procédures Standardisées des délégués à la protection de l'Enfance pour la gestion des cas des enfants ayant besoin de protection, December 2024.

1 DANGER SITUATION



2 IDENTIFICATION AND REPORTING TO THE COMPETENT AUTHORITIES

3 QUALIFICATION - ASSESSMENT OF THE CHILD'S RISKS AND NEEDS



4 DRAWING UP OF A CARE PLAN

5 IMPLEMENTING THE CARE PLAN



6 FOLLOW-UP AND REVISION OF CARE PLAN

7 CASE CLOSURE





The role of the Child Protection Officer (Délégué à la Protection de l'Enfance - DPE)

The Child Protection Officer (DPE) occupies a central position in the national system for protecting children at risk in Tunisia, in accordance with the provisions of the articles of the Child Protection Code.

The Child Protection Officer is responsible for:

- **Receiving reports of situations** endangering the health, safety or morals of children. These reports may come from state structures (police and national guard institutions, educational or health institutions, etc.), civil society organizations (associations, UN agencies, etc.) or ordinary citizens.
- **Evaluating the reality of the reported danger.** To this end, the Child Protection Officer has a number of legal prerogatives, including the right to summon the child and his or her parents to listen to their statements, to go to the child's place of residence to observe the situation, and to carry out any investigation deemed useful. He may be accompanied by professionals such as a psychologist or a social worker, in order to better assess the situation (authorization from the family judge is required for these prerogatives).

The Child Protection Officer thus acts as a veritable social inspector, invested with a mission of vigilance, prevention and coordination of care around the child's best interests.



The family judge

The family judge has the power of self-referral and can also be referred to by the juvenile judge, the public prosecutor, the Child Protection Officer, public social action services or public institutions dealing with children's affairs. In addition to litigation concerning divorce and parental authority, the family judge decides on measures to protect children in danger. He/she can order judicial inquiries and

supervise the work of the Child Protection Officers, who then monitor the enforcement of judgments, including protective measures, which can include:

- Removal from the family or environment and temporary placement in an alternative care solution.
- Appointment of legal guardianship for minors at risk.
- Facilitating access to psychological assistance.
- Facilitating access to health care.
- Integration into educational establishments.

26. Reporting cases of children at risk to the DPE is a legal obligation (article 31 of the CPE).

27. The Child Protection Officer has the powers of a judicial police officer (art 36 of the CPE).





28. See articles 51 to 67 of the CPE.

29. The Child Protection Officer assumes a temporary decision-making role before the family judge intervenes, but any placement must be validated by a judge within 48 hours.

1.3 Protection and care solutions³⁰

The legal framework for protection explicitly provides and details protection solutions for all children at risk taken into care by protection services,³¹ through either conventional temporary placement measures, or emergency placement measures following judicial authorization in the event of imminent danger.³² These protection solutions can include placement³³ in public or private structures (organized by civil society and/or families). In parallel, IOM and UNHCR have set up protection solutions for children on the move, as part of their assistance and protection to specific segments of the population on the move.

The table below summarizes the existing state centers and institutions designed to provide assistance and care to all children considered to be at risk, as provided for under Tunisian law.

Center	Supervision	Legal status of children	Purpose	Basis of placement	Environment
 <p>Center for Defense and Social Integration (CDIS)</p>	 <p>Ministry of Social Affairs</p>	Vulnerable children, out of school, without family support	Social integration and protection	Administrative decision or family judge	Open, day care, community-based
 <p>Child Social Protection Center (CPSE)³⁴</p>	 <p>Ministry of Social Affairs</p>	Vulnerable children aged 6 to 18	Protection, accommodation and reintegration	Decision by family judge or child protection officers	Open









30. Alternative care refers to the various types of alternative care for children deprived of family support or at risk of being so. There are different types of alternative care, including informal and formal, and for short or long-term periods. Such care must be provided by the State: «When, even with appropriate assistance, the child's family is unable to provide care, abandons the child or entrusts him or her to a third party, the State is obliged to protect the rights of the child and provide appropriate alternative care, with the assistance or through the competent local authorities and duly empowered civil society organizations. It is the responsibility of the State, through the competent authorities, to oversee the safety, well-being and development of any child in alternative care, and to ensure regular review of the appropriateness of the alternative care system in place.» Guidelines for the Alternative Care of Children, A/RES/64/142.

31. See in particular law no. 58-27 of March 4, 1958 on public guardianship, unofficial guardianship and adoption, as amended by law no. 59-69 of June 19, 1959, law no. 98-75 of October 28, 1998 on the attribution of a patronymic name to abandoned children of unknown parentage, and law no. 1967-47 of November 21, 1967 on foster care.

32. Art 45 to 50 of the CPE.

33. Placement refers to the act of placing a child in alternative care (for example, with a foster family, extended family, residential home or foster care center) when parental care is unavailable, inadequate or contrary to the child's best interest. It is a protective measure, often temporary, guided by the principles of the child's best interests, necessity and appropriateness. See: Articles 20-21 of the Convention on the Rights of the Child; United Nations Guidelines for the Alternative Care of Children, paragraphs 59-61 on the stability and review of placements).

34. CPSE, SOS Femmes Violence Tunisie

Centre	Supervision	Statut juridique des enfants	Objectif	Base de placement	Environnement
 <p>Social Support and Orientation Center (CEOS)</p>	<p>Ministry of Social Affairs</p> 	<p>all children at risk</p>	<p>Emergency temporary placement</p>	<p>Administrative placement Decision of family judge or child protection officer</p>	<p>Open</p>
 <p>Social Center for Observation of Children (CSOE)</p>	<p>Ministry of Social Affairs</p> 	<p>Children in conflict with the law</p>	<p>Placement/ Observation for rehabilitation and reintegration after offenses</p>	<p>Judicial decision by criminal juvenile judge</p>	<p>Structured, semi-secure</p>
 <p>Integrated Center for Youth and Children (CIJE)</p>	<p>Ministry of Women, Family, Children and Seniors</p> 	<p>At-risk children in school or training aged between 6 and 18</p>	<p>Long-term educational support and protection for schoolchildren</p>	<p>Decision by family judge or child protection officer based on vulnerability and schooling</p>	<p>Open and education-friendly</p>
 <p>National Institute for Child Protection (INPE)</p>	<p>Ministry of Social Affairs</p> 	<p>Abandoned, orphaned and at-risk children aged 0 to 6</p>	<p>Care for children deprived of family support until their return to their biological families or their integration into foster families through foster care, kafala or adoption.</p>	<ul style="list-style-type: none"> - Judicial decisions by family judges. - Conventional or emergency measures taken by child protection officers. - Requisition from local police stations. - Direct placement by mothers in the presence of security services. 	<p>Structured, semi-secure</p>

United Nations shelters

Despite the primacy of the Tunisian state's responsibility to protect all children at risk on its territory, including by organizing alternative protection solutions through emergency accommodation, UNHCR and IOM also manage alternative protection solutions for children on the move considered to be at risk, within the limits of their mandates and the places available in the homes of these two agencies.³⁵

- UNHCR shelters: At the end of April 2025, 271 minors were accommodated in UNHCR shelters - 232 were unaccompanied refugee children.³⁶
- Jderia temporary emergency shelter managed by UNHCR: In April 2025, 376 people (mostly of Sudanese origin) were present in Jderia - and 11 were unaccompanied refugee children.³⁷
- IOM shelters: At the end of July 2025, 103 children were accommodated in IOM shelters (Médenine, Tunis, and Tataouine).³⁸

Protection services provided by civil society

The alternative care and protection solutions offered by the public child protection system remain largely incapable of meeting the essential needs of children at risk, particularly in terms of accommodation. Other forms of care, outside of state-run institutional structures, are therefore indispensable alternatives in view of the limitations of the current system.

A number of centers and shelters (such as the SOS children's villages, shelters for women victims of violence, or the Amen network nurseries for children aged 0-3 born out of wedlock) are run by civil society organizations, even though the placement of children in these centers is always the result of a decision by the family judge following emergency placement by the Child Protection Officer. These various centers, which are limited in number and unevenly distributed across the country, generally take in young children up to the age of 6, but also older children and women.

35. In Tunisia, IOM and UNHCR run fewer than a dozen small temporary accommodation centers, each able to accommodate just a few hundred people. In southern Tunisia, the various shelters can accommodate a maximum of 100 people in Médenine, 110 in Zarzis and 330 in Tataouine. These are open facilities, from which the people housed can leave freely. For the UNHCR, the total capacity of the five safe temporary shelters is around 500 people, plus 450 people in Jderia (although Jderia is currently overcrowded).

36. Humanitarian source.

37. Humanitarian source.

38. Humanitarian source.

The decision to place a child in danger in alternative care

What does international law say?

The family is the natural and fundamental building block of society and must be afforded the widest possible protection and assistance, particularly for the development of children. The preamble to the CRC emphasizes that a child «should grow up in a family environment, in an atmosphere of happiness, love and understanding». States must therefore ensure that no child is separated from his or her parents against his or her will, unless such separation is necessary to safeguard the child's best interest.³⁹ For children who are unable to live in their family environment due to risks, States are obliged to guarantee appropriate alternative care solutions that respect the child's best interest, such as foster care or *Kafalah*⁴⁰.

The decision to remove a child from his or her family environment must be taken by the competent authorities, in accordance with national law (which must be consistent with international law). Preventive measures and family and community support solutions must be favored, including social and financial assistance⁴¹. If alternative care is decided, states must provide children with the emotional support, education and programs necessary for healthy development, including established standards of safety,⁴² education,⁴³ health care,⁴⁴ nutrition,⁴⁵ privacy, leisure activities,⁴⁶ family contact, and participation.⁴⁷ A process of regular review of the child's situation and ongoing contact with the family must be put in place to ensure that the child is not institutionalized for longer than necessary.⁴⁸ In this context, children themselves must have access to, and be aware of, effective and impartial complaints mechanisms concerning their treatment and the conditions of their placement.⁴⁹

39. Art. 9 of the CRC. See also «Ending immigration detention of children and providing adequate care and reception for them», Report of the Special Rapporteur on the human rights of migrants, July 2020, §23.

40. Art. 20 of the CRC: "Such care could include, inter alia, foster placement, kafalah of Islamic law, adoption, or if necessary, placement in suitable institutions for the care of children". See also UNICEF, An introduction to Kafalah, 2023.»In child care, Kafalah is defined as the commitment of an individual or family to voluntarily assume daily responsibility for the care, education, safety and protection of a child deprived of family care, in the same way that a parent would do for his or her own child. See also **International Social Service, Kafalah : preliminary analysis of national and cross-border practices.**

41. Art. 18 and 19 of the CRC.

42. Art. 3, 19, 26, 32 and 37 of the CRC.

43. Art. 28 of the CRC.

44. Art. 25 of the CRC.

45. Art. 24 of the CRC.

46. Art. 31 of the CRC.

47. Art. 6 of the CRC.

48. Art. 25 of the CRC.

49. Art. 12 and 25 of the CRC.

2. THE REALITY OF PROTECTING ALL CHILDREN CONSIDERED TO BE AT RISK

This section focuses on the structural weaknesses of the protection system for all children considered to be at risk, as revealed by OMCT's research.

2.1 Prevention of situations of danger

According to interviews with experts consulted for this study, the child protection system in Tunisia fails in its primary function of preventing violations of children's rights. Despite the planned preventive intervention possibilities of child protection services,⁵⁰ this aspect is absent in practice, mainly due to a lack of available human resources, and to the low importance given to this aspect of intervention by the Tunisian state in defining budgetary and political priorities on children's issues⁵¹.

Prevention activities (such as strengthening the family, promoting alternatives to detention, implementing targeted action plans against specific phenomena such as cybercrime and drug addiction, awareness-raising workshops, visits to education and training establishments) remain occasional, very limited in terms of the number of beneficiaries and their sustainability. According to the experts consulted for this study, the lack of coordination between state authorities and civil society organizations since 2022, with, for example, the end of certain joint projects in schools and youth centers, also impacts prevention.

50. This duty of prevention is established by several articles of the Child Protection Code (CPE), notably article 2, which guarantees children the right to benefit from various preventive measures, article 13, which favors educational means before penal intervention, and article 32, which requires all adults to report situations of danger. The duty of prevention in terms of child protection is established by several pieces of legislation, notably article 31 of the (CPE) which imposes the obligation to report, article 14 of the organic law on the elimination of violence against women, as well as Ministry of Education circular number 51 of September 2020 which activates the mandatory reporting mechanism to the Child Protection Officer.

51. General comment No. 19 (2016) on public budgeting for the realization of children's rights (art. 4) | OHCHR and CRC General Comment on CRC GMI - General comment no. 5 (2003): General measures of implementation of the Convention on the Rights of the Child | Refworld

2.2 Identifying children at risk

Identifying children at risk is the first key step⁵². It enables children and their families to access the protection system. However, at the time of finalizing this study (December 2025), several difficulties are preventing sufficient identification of children at risk.

Poor take-up of the mechanism for reporting children at risk

The mechanism for reporting children at risk to protection services is currently under-utilized,⁵³ as many children in need of protection are not identified and referred to the protection system. Despite the presence of Child Protection Officers offices in every governorate, several experts consulted for this research pointed to the lack of geographical accessibility of protection services for children and their families. The towns where the Child Protection Officers offices are located are thus over-represented in the reports received and processed by the protection services.

Lack of referral of certain profiles by the security forces

The law enforcement and border authorities are among the institutions most involved in identifying and referring children at risk to the protection services. According to the experts consulted for this study, situations of danger or threat that exceed their prerogatives are generally not detected. This prevents a complete and diversified identification of children at risk. At the same time, when it comes to children in conflict with the law (suspects or perpetrators of misdemeanors and felonies), only the Public Prosecutor, the Juvenile Judge and the General Committee for Prisons and Rehabilitation (Comité générale des prisons et de la rééducation - CGPR) are able to report those in need of protection. According to OMCT's research, the lack of resources invested in training civil servants and law enforcement and border authorities from the Ministries of Justice, Defense and Interior in a child-sensitive approach unfortunately contributes to the lack of reporting.

2.3 Qualifying situations of danger

Inconsistent interpretations of the notion of danger

Despite the inclusion in law of criteria defining a situation of danger,⁵⁴ there is **no uniformity in the interpretation and application of these criteria between different institutions** - or even within different regional and local departments of the same institution.

The restrictive interpretation of a situation of danger leads to differentiated qualification of similar cases and restricted care.⁵⁵ Child protection experts and social workers have confided that the local socio-cultural context, the absence of a coherent, uniform approach and the weakness of the state's capacity-building system all have an impact on the perception and qualification of situations of danger by all the players involved.

52. UNHCR ExCom Conclusion 107 - Conclusion No. 107 (LVIII): Children at Risk - Adopted by the Executive Committee (2007) | Refworld and OHCHR - Migrants in vulnerable situations | OHCHR

53. Art. 31 CPE.

54. Art. 35 CPE.

55. A restrictive interpretation of article 20 of the CPE limits the Child Protection Officer intervention to the eight cases listed therein, whereas article 30 of the same code authorizes the Child Protection Officer to act in all situations where the child's health or integrity is threatened, including the situations covered by article 20.

Lack of coordination between actors for a holistic qualification

Child protection experts in Tunisia have reported on the importance of dialogue between the various players involved in child protection in the qualification of facts, despite the obligation to provide all the information necessary for an accurate qualification of the danger.⁵⁶ At present, social workers do not make sufficient use of the possibility of adding/reporting other facts and information to qualify a situation of danger - which prevents a complete and holistic qualification. The role of the various professionals (social workers, psychologists, medical staff) is often underestimated at the time of qualification by the protection services, who frequently have access to partial and fragmented information.

«We work on a corporatist basis - doctors on one side, social workers on the other: the idea of working together is missing.»

A Tunisian social worker

Depending on the initial training of Child Protection Officers staff, their qualifications may be more or less holistic (depending on whether they were originally social workers or lawyers), with economic threats to children being ignored by some staff with a narrow interpretation of danger situations.

No transfer of cases from the (criminal) juvenile court to the family court

Under article 99.2 of the Child Protection Code (CPE), the children's (criminal) judge has the option of transferring a child's case to the family judge,⁵⁷ in order to prioritize a protective approach rather than criminalization, which can lead to criminal proceedings being dropped. This transfer is only possible when it is established that the child is suffering from a notable and ongoing failure to provide for his or her upbringing and protection, or that the parents or carers are incapable of ensuring his or her safety and development, following the investigation or a social inquiry ordered by the juvenile judge. In such cases, referral to the family judge makes it possible to mobilize protective measures and involve the competent institutions and services to put an end to the situation of danger and ensure the child's protection, care and reintegration.

According to the experts consulted for this study, however, the diversion of children in conflict with the law through case transfers is rare, and even more so for children on the move. This measure of transfer to the family judge is not applicable if the child is deprived of his or her liberty and placed in a re-education center (in this case, the child's situation falls specifically within the criminal framework and the remit of the children's judge and the re-education authorities). As pointed out in Focus Brief 2 on criminalization, children on the move who are arrested are almost invariably remanded in custody, which prevents their cases from being transferred to the protection system.

56. Art. 31 and 32 of the CPE.

57. Art. 99 of the CPE.

2.4 Protecting children at risk

Even if children in danger are reported, the dangers correctly qualified and their cases taken in hand by the protection services, the protection of children considered to be in danger - whether Tunisian or foreign - suffers from numerous difficulties. The following were particularly highlighted during OMCT's research.

Diverse interpretations of the best interest of the child

Despite the fact that the best interest of the child is enshrined in law,⁵⁸ **there is currently no precise definition or consensual application of this concept in practice in Tunisia - divergent interpretations by different actors prevent a uniform approach at national level.** For example, some institutions have divergent views on placement in state structures or outside the family environment and consider corporal punishment or deprivation to be disciplinary measures. Social workers consulted for this study reported having witnessed acts of violence committed by members of the security forces against children in conflict with the law. Recognition of the child as a subject of rights thus remains variable and has a major impact on the protection of children at risk.

«There are as many interpretations of the best interests of the child as there are actors.»

A Tunisian social worker

Justice plays a key role in defining the best interest of the child, and in the adoption of conventional protection measures. Despite their status as conventional⁵⁹ and the Child Protection Officer role as proposer, all reports and the resulting protective measures require judicial validation, guaranteeing the legality and control of actions taken to protect the child.⁶⁰

According to the experts consulted, judges are not sufficiently equipped to qualify situations of danger - and opt for appropriate judicial protection - given their lack of training and expertise in children's rights. According to the experts consulted by OMCT, several factors may explain judges' lack of specialization in child protection matters:

- The initial training of magistrates, both at university level and at the Institut Supérieur de la Magistrature, does not give sufficient space to in-depth courses on children's rights. This gap in the basic curriculum limits the acquisition of the specific knowledge and impacts their ability to understand the complex situations involving children at risk or in conflict with the law. As a result, judges do not always take up their duties with solid expertise in this crucial field (even though family or children's judges are required to have ten years' seniority).
- The texts governing judges' careers do not encourage specialization. Unlike other judicial systems, the current regulatory framework does not provide clear mechanisms or sufficient incentives to enable judges to dedicate themselves specifically and permanently to child protection. This lack of a specialization leads to frequent rotation of magistrates in these positions, preventing the development of in-depth expertise and essential cumulative experience.

58. See Art. 52 of the Tunisian Constitution, Art. 4 of the CPE, the Personal Status Code (Art. 32, 58, 60, 62, 67) or organic law no. 2016-61 on preventing and combating human trafficking.

59. See article 43 of the CPE. They include keeping the child with his or her family with parental involvement and monitoring, organizing social interventions, taking precautions to prevent dangerous contact, or using educational, social, rehabilitation and care services, even if the latter involve very short accommodation, or exceptional temporary placement.

60. In cases of imminent danger, the Child Protection Officer may (without requiring prior authorization from the family judge) take the initiative of removing the child from the place of danger, even using the police, and placing him or her in a safe place under his or her own responsibility, on the basis of article 46 of the CPE.

Whether on the part of judges themselves, who are aware of the complexity of cases and the need for greater skills, or on the part of the various actors involved in child protection (state institutions, civil society organizations), the need for a more specialized juvenile justice system was clearly reported. The lack of an institutional response to this demand, in terms of enhanced training and recognition of genuine specialization, contributes to maintaining this deficiency.

Children's limited participation in decisions concerning them

Despite being enshrined in the law,⁶¹ the principle of children's participation in all decision-making processes concerning them has been reported as limited: children and their parents have the right to be consulted in any decision concerning the child - except in exceptional circumstances - in practice, they are consulted little or not at all. Existing procedures do not allow for informed child consent to proposed and adopted protection solutions.

A fragmented system

Despite the importance of inter-agency coordination being enshrined in legislation,⁶² several child protection experts deplored **a lack of real willingness to work together in a coherent and coordinated way on the part of the various actors involved at every stage in the protection of children at risk**. According to the organizations consulted, there is no dedicated, functional working group or commission at national or regional level that brings together all the actors involved in child protection. Although an interministerial circular was discussed to set up a child protection working group and cells at regional level bringing together all actors (Child Protection Officers (DPE), Regional Directorate of Social Affairs, UN agencies, civil society organizations), only one child protection cell is actually functional for the Médenine governorate alone - and no longer even includes associative actors since May 2024. According to OMCT's research, collaboration between all these players is generally limited to occasional meetings, in the framework of awareness campaigns or the fight against emerging and worrying phenomena such as cybercrime or drug addiction. The players rarely meet around the table to coordinate decisions; exchanges often take place informally by telephone - on a case-by-case basis. For example, despite being enshrined in the law,⁶³ the procedure for Child Protection Officer to transmit a monthly summary of cases to the family court judge is reportedly not implemented in practice.

In the absence of a clear mapping of services and the protection system, and of standardized operational procedures adopted by all actors, the multiplication of institutions involved in supporting children under the protection system results in a duplication of responsibilities for their educational and social support, with MAS and MFFES intervening in similar situations. Several of the experts consulted for the research pointed to a lack of definition of horizontal and vertical responsibilities, and a low level of coordination between the actors who report to different ministries.

61. See Art. 1.6, Art. 10 and Art. 42 of the CPE.

62. Article 4 of the CPE states that the best interest of the child must be a primary consideration in all measures taken with regard to children by the courts, administrative authorities and social welfare institutions, whether public or private. This principle gives a central role to the Child Protection Officer, which accompanies and monitors the child throughout the social and legal protection phases. Prime Ministerial Circular no. 39 for 2001, on assisting child protection delegates in the performance of their duties, states that «it is desirable that Ministers, Secretaries of State, Governors, Presidents of Municipal Councils, as well as the presidents and general directors of public institutions and establishments, issue the necessary instructions to the central and regional services under their supervision, and take the necessary measures to ensure the provision of assistance to child protection officers and the provision of all the necessary capacities to guarantee that they carry out their missions in the best conditions and exercise their functions in the most complete manner, in accordance with the provisions of the Child Protection Code». On the other hand, although the CPE does not have a strong focus on coordination, this is specified by decree no. 96-1134 of June 17, 1996, which defines the means of action of the body of child protection officers with the social services and organizations concerned (see in particular articles 2 and 3).

63. Art.41 of the CPE.

Limited financial, human and logistical resources

The resources available to child protection services do not appear to be commensurate with the identified needs to prevent high-quality case management and follow-up.⁶⁴

Although 40 new Child Protection Officers have been recruited and appointed in the regions, in addition to the 78 already in place,⁶⁵ these appointments have not been accompanied by sufficient recruitment of additional staff (social workers, educators and psychologists). At the same time, the number of Tunisian social workers (an ageing profession with few new recruits) has been stagnating for years.

Reality: a crying shortage of Child Protection Officers

In the governorate of Médenine, there are four Child Protection Officers for almost 400,000 inhabitants (July 2025), with one social assistant working with them and no social worker specialized in psychological assistance: too few for a governorate marked by the absence of certain key services (pediatric hospital services, emergency accommodation) and significant needs, particularly among communities on the move. The governorate of Tozeur can count on only two Child Protection Officers by December 2024.⁶⁶ In the governorate of Sfax, the Child Protection Officers are unable to cover all needs, according to the organizations consulted, even though the vast majority of the hundreds of children on the move in need of protection living in the informal settlements of El Amra are neither identified nor cared for by the protection services.⁶⁷

The Child Protection Officers do not have the resources to respond in depth to all reports, preventing the launch of social investigations and emergency protection measures for children at risk.⁶⁸ The saturation of the reporting mechanism results in an **inability to process requests and take long-term charge of referred cases, even though the mechanism is under-utilized**. Many social investigations (carried out by social workers within foster families) are reportedly unsuccessful due to a lack of human resources. Despite urgent measures approved by the courts, there have been reports of significant delays in the execution of family court decisions to protect children in need of care.

Even after being taken into care, children often continue to face situations of danger, hence the importance of follow-up. Tunisian legislation provides for short-, medium- and long-term support to prevent a relapse into a dangerous situation, and for cases to be closed if the child is no longer exposed to danger. In practice, the organization of work and the lack of human resources make it difficult to monitor and support children who have benefited from protection at every stage of their care. Social workers in Tunisia devote a disproportionate amount of their time to administrative tasks, given:

- A non-digitized, time-consuming case processing system, ill-suited to today's challenges.
- Limited means of professional travel to cover entire governorates.

64. UNICEF's budget analysis reveals a persistent under-allocation of resources to child protection in Tunisia, with less than 1% of the national budget devoted to this sector between 2010 and 2020 - reaching just 0.03% in 2020. Funding remains fragmented: after 2018, the Ministry of Family, Women, Children and Seniors became the main contributor (56% in 2020), succeeding the Ministry of Social Affairs. Despite this, funds directly dedicated to child protection remain low. The Ministry of Justice's share has fallen from 29% to 15% between 2015 and 2020, in contradiction with international recommendations, while contributions from the Ministry of the Interior are negligible. This situation highlights a worrying discrepancy between child protection commitments and the resources allocated. See UNICEF, «Une analyse budgétaire éclairante sur le secteur de la protection de l'enfance en Tunisie», January 2024. In addition, the budgets of the various ministries can be consulted on the Ministry of Finance website, under this link: Tunisian government ministry budgets

65. Humanitarian source.

66. UNICEF, Bi-annual report on the activities of Child Protection Officers 2020 - 2021.

67. Humanitarian source.

68. According to the latest available statistics for the year 2023, the total number of reports received by Child Protection Officers amounted to 25,057. Of these, 23,737 reports were retained, leading to the opening of a file. These data are taken from the latest activity report for the offices of Child Protection Officers for 2022/2023, and are not available online.

- Significant involvement of Child Protection Officers in regional commissions:⁶⁹ the Child Protection Officer is placed under the authority of the Governor, not to mention frequent requests from the central administration, particularly for the 18 Child Protection Officers in Greater Tunis.

According to the organizations and experts consulted, all these constraints considerably reduce their capacity to carry out actions in the field and ensure in-depth follow-up of the children in their care, often transforming their role into a simple referral task, despite a context of rupture with civil society and saturation of public establishments.

The weakness of state protection and care solutions

The state's public placement structures are insufficient in number and unable to take in new children considered to be at risk, due to the saturation of establishments and an advanced state of disrepair. The closure of the Zahrouni center has considerably reduced intake capacity, and existing public centers are facing a lack of financial and human resources, in particular a shortage of specialized staff and qualified professionals to support children considered to be at risk. Many of the organizations consulted stressed the lack of psychologists in sufficient numbers. The centers are located on the outskirts of urban centers, contributing to a feeling of isolation for the children. All the experts consulted for this study, as well as the families of children in care, confirmed that the housing conditions can even generate additional risks of exposure to violations of children's rights.

At the time of finalizing this report (December 2025), **there is no centralized, digitized system that would provide the Family Judge and the Child Protection Officer with real-time visibility on the number of places available in residential institutions for children at risk**, whether these are centers under the responsibility of the Ministry of Social Affairs or the Ministry for the Family, Women, Children and Seniors. This lack of visibility makes it difficult to direct children directly and quickly to care structures adapted to their needs and to vacant places, thus contributing to the challenges of care. Available statistics focus more on the number of referrals or the number of children taken into care overall, but rarely on the exact intake capacity and saturation rate of the various centers. The absence of accessible official data on the existing capacities of the child protection system also prevents a global view of the system and an assessment of its capacities and shortcomings for civil society actors working on reform and capacity-building of the protection system.

According to several child protection experts in Tunisia, the alternative care and protection solutions provided by public institutions do not represent sustainable solutions for the long-term development and protection of children at risk. The general approach to child protection is to respond to immediate needs, where possible, without thinking strategically towards sustainable, comprehensive solutions.

69. In accordance with article 1 of Decree no. 96-1134 of June 17, 1996 on the special status of the body of Child Protection Officers and the areas of its intervention and its means of action with the social services and organizations concerned.

Living conditions at the Centre d'Encadrement et d'Orientation Sociale (CEOS) in Sfax, anything but a lasting solution

Located in an isolated spot, at kilometer 14 on the road to Gabès, with no shops or services nearby, the CEOS in Sfax has a capacity of 45 places for temporary placement and welcomes all types of all types of individuals in situation of vulnerability (two pavilions, one for women and one for men - and historically more dedicated to single women, elderly and street people, and vulnerable Tunisian adolescents). Accommodation conditions are difficult, with no space dedicated solely to children, exposing them to additional risks as they are mixed with adults (including cases of physical and sexual violence, exposure to drug use, etc.). While a psychologist and social workers intervene at regular intervals, there are no human financial resources to organize school, educational and recreational activities, nor the possibility of enrolling in a training center at the same time. The lack of resources, is starkly evident in the dilapidated state of buildings and in poor quality food.

«CEOS is all white walls, where children sleep and watch TV with nothing else - it's a little prison.»

A social worker who has worked in CEOS

The Social Support and Orientation Centers (Centres d'Encadrement et d'Orientation Sociale -CEOS) is not a closed center, but leaving the center is still conditional on the agreement of the management, in a logic of protection pushed to the extreme, to the detriment of the child's development. According to an organization that has reported numerous cases of unaccompanied Tunisian children and children on the move, CEOS runaways are frequent.

3. LACK OF PROTECTION FOR CHILDREN ON THE MOVE IN TUNISIA

All the organizations (national associations and international organizations) and experts consulted - despite the fact that they report cases of children at risk to child protection services on a daily basis - reported very limited access to the child protection system for children on the move, and weak and inconsistent care for these extremely vulnerable children.⁷⁰ This section summarizes the difficulties encountered by children on the move considered to be at risk during the various stages of the protection case management system.

3.1 Difficulties in identifying children on the move considered to be at risk

Several factors hinder the identification of children on the move who are considered to be at risk - pushing the majority of them into limbo outside any protection scheme.

Criminalization leading to fewer referrals

Civil society organizations help to create a bond of trust between social services and their referred beneficiaries, who generally have little trust in institutions. However, in the context of the shrinking civic space and criminalization of solidarity and humanitarian assistance to people on the move since May 2024,⁷¹ several of the main organizations reporting cases of children on the move in danger, such as Terre d'Asile Tunisie (TAT) and the Tunisian Refugee Council (CTR) among others, have had to suspend their programs of direct assistance to and physical reception of people on the move - greatly impacting the identification of children on the move in danger.

Civil society organizations have also reported that they do not wish to be identified as assisting people on the move and would therefore limit their reporting to the authorities in order to protect their operational space.

Limited referral of children on the move to protection services by security forces

The identification of children in need of protection largely depends on referrals to protection services by public services (health authorities, education, etc.). However, the majority of people consulted for this study noted that **security forces report very few children on the move to child protection services**. They reportedly have neither the will to identify vulnerable children on the move and consider them to be at risk - especially forces active in areas where people on the move are concentrated and in border and coastal zones - nor the practical means to carry out vulnerability assessments.

70. There is no public estimate of the number of children on the move reported to Child Protection Officers services for 2024 or for previous years. In the absence of a centralized information system, current statistics do not specify the nationality of the children. Reports are recorded according to the child's situation, without distinction based on origin. The latest available statistics for 2023 therefore do not take this specific category into account. However, it should be noted that children on the move did benefit from some of the placement measures listed for 2023. The majority of these placements involved children who had passed through the (criminal) children's judge (for illegal entry or residence) and who were then placed in a protection center.

71. By systematically targeting associations that protect and assist people on the move, and by exerting increasing pressure on their financial resources, the Tunisian authorities are seriously compromising civil society's ability to operate and defend vulnerable people. For more information, see OMCT, Routes to Torture Vol. 3: The shrinking of civic space and its impact on people on the move in Tunisia, January 2025.

Limited access to communities on the move

According to the experts consulted for this study, the Tunisian Red Crescent (CRT) maintains a monopoly on humanitarian assistance to people on the move and keeps other actors at a distance from the areas where the most vulnerable children on the move reside. As a result, civil society organizations have been unable to intervene in the informal settlements of northern Sfax since the summer of 2023, where many children reside in informal shelters, exposed to numerous risks to their safety and health. Social services, including Child Protection Officers, suffer from the same access restrictions.

Discriminatory access to public services prevents identification

Children on the move have limited access to public services (such as health and education facilities), which limits their identification. Thus, while reports of children at risk often originate from schools, colleges and training centers, the lack of integration of children on the move within the education system prevents the identification of children at risk of violations and their referral to protection services (see Focus Brief 6 on access to education for children on the move).

In addition, before February 2023, two initiatives improving identification and referral to the relevant services (including the child protection system) had been launched:

- The National Referral Mechanism (NRM) launched in December 2021 as a multi-sectoral coordination platform for the identification and referral of victims of trafficking (including children on the move).⁷²
- The Shamel Office, set up by UNHCR and IOM as a reception, information and referral space for refugees, migrants and Tunisian returnees in the municipality of Raoued.⁷³

These two initiatives have not been active for people on the move since February 2023. At the same time, reports from the National Authority to Combat Trafficking in Persons (INLCTP) have reportedly been declining since 2022.⁷⁴

Little use of protection services by children on the move and their families

Communities and families account for a significant proportion of referrals made to child protection services. However, in the case of people on the move - in a context of risk of arrest, forced displacement and deportation - an absence of referrals has been reported. This does not mean that there are no needs, but is mainly the result of several factors linked to their migration journey and their perception of state institutions:

- Fear of turning to the authorities for protection: Children generally lack confidence in public institutions, which they associate with the risk of being reported or arrested, leading them to avoid any contact with state services, including Child Protection Officers.
- Low awareness of their rights and of the services available in Tunisia.
- Discriminatory access to transport, which prevents free movement towards protection services.
- The perception of their presence in Tunisia as strictly temporary.

72. Council of Europe, «Tunisia launches a new initiative to better identify and assist victims of trafficking: the National Referral Mechanism», 15/12/2021

73. UN in Tunisia, «Inauguration of the «Shamel» Office for the inclusion of refugees, asylum seekers, migrants and Tunisian returnees in the Al Ghazella citizen space», 12/2021

74. In 2022, 158 children were reported as potential victims of human trafficking, a figure that decreased to 139 cases in 2023. Humanitarian source.

3.2 Classification of children on the move as children at risk in need of protection

Even if children on the move are identified, their care depends on the classification of the danger they face, and the resulting need for protection.

A legislative and regulatory framework that is not very inclusive of children on the move

According to OMCT's research, and the child protection experts consulted, the child protection system in Tunisia established by the legislative and regulatory framework does not provide a sufficient level of protection for children on the move. **The definition of a child at risk⁷⁵ makes no explicit mention of children on the move** - even though unaccompanied children are theoretically considered to be «at risk» given their lack of family support. The Tunisian legislative framework thus suffers from a significant legal vacuum, failing to establish any protective status for children on the move, which seriously affects the work of child protection intended by the legislator. The latter are cited as a specific vulnerable category in the standard operating procedures adopted in December 2024 by the MFFES - testifying to the efforts of government stakeholders and UNICEF - but this working document has not been signed to date by the Ministry of Social Affairs.

Under-reporting of certain violations

According to the experts consulted, certain violations suffered (notably trafficking and exploitation within communities on the move) are under-reported by children and their families, preventing a fair assessment of their situation and therefore holistic protection by the state. This under-reporting is the result of:

- Low trust in protection services and widespread ignorance of their existence and the services provided/ accessible.
- The internalization of certain forms of violence as normal by children on the move, and ignorance of their rights.
- The impossibility of verbalizing the violence suffered, a consequence of psychological trauma.
- The language barrier for non-Arabic or non-French speakers.
- Fear of denouncing the perpetrators of violations, whether they be agents of the security forces, relatives or members of the community, for fear of reprisals among other things.

75. The six categories of children at risk are detailed in article 20 of the CPE. See also: UNICEF, **Types and subtypes of children in need of protection, 2024**.

76. The Child Protection Officer Standard Procedures for Case Management of Children in Need of Protection, adopted by the MFFES, categorizes the typologies of children in need of protection. The categories include children without family support; children at risk due to their socio-familial environment; child victims of violence; child victims of trafficking, exploitation and labor situations; children on the move; and children in need of protection due to their behavior. The category of children on the move is subdivided into unaccompanied children, separated children, asylum-seeking children and refugee children.

77. These procedures institutionalize the case management system for children at risk and create a «case conference» - to conduct, among other things, BID panels (see box on «assessment and formal determination of best interests») for children on the move with the DGPE, relevant UN agencies, the Ministry of Social Affairs and the Ministry of Women's Affairs.

Transfer of responsibility to UN agencies

According to the people consulted for this study, the perception within public institutions is that children on the move are in Tunisia only temporarily, and that no lasting solution for their integration into Tunisian society is possible, contributes to their exclusion from the public protection system.

As a result, the Tunisian authorities tend to **transfer their responsibility for protecting children at risk to the IOM and UNHCR**, considering these organizations to be the main actors responsible for children on the move. In practice, children at risk are sometimes referred by social services to IOM or UNHCR, without any prior protective measures being taken by the State, in contradiction with its primary obligations. For children on the move, the UN agencies are responsible for family tracing and assessing alternative solutions (such as return or resettlement to a third country).

Criminalization of children on the move

Since July 2023, in line with the security approach adopted by the Tunisian state, children on the move have been considered above all as children in conflict with the law on the basis of their irregular situation, and not as children at risk⁷⁸ - particularly if they are part of a group of arrested adults (see Focus Brief 2 on the criminalization of children on the move). According to lawyers defending children on the move in conflict with the law, no child on the move was convicted before the summer of 2023 for illegal residence and entry. On the contrary, the practice was to place them in one of the solutions provided by the protection system for children in need of protection. The majority of experts consulted stressed that the poor coordination between law enforcement and border management authorities and those responsible for protection disproportionately impacts children on the move.

«If we try to find solutions for foreign children, the Child Protection Officers tell us: you've come to the wrong address, go and see the Ministry of the Interior or the Government.»

A Tunisian association leader

Whatever their status - whether they are on the move, being prosecuted on administrative grounds or incarcerated in correctional centers - it is imperative that these children benefit from the full protection of their rights.⁷⁹

78. With regard to children in conflict with the law, several people consulted for this research confirmed that the lack of reporting from police forces to the DPE also concerned Tunisian children. However, unlike children on the move, cases are transferred from the juvenile judge to the family judge during the investigation phase, in order to adopt a «protection» rather than criminalization approach.

3.3 The reality of protection for children on the move

Children on the move can be identified and reported to child protection services, and then taken into care in a multitude of situations in principle, including:

- After being reported to the protection services by public health structures (when a child goes to hospital alone, for example, or after giving birth to a woman on the move in a street situation), by associations, or by private citizens.
- When one or both parents are arrested - generally on the basis of their administrative status, after being intercepted at sea, or for other common law offences - and the child is reported by the security forces to the protection services.
- When a child is arrested without his or her parents - for example, during begging activities in city centers, or after the disappearance of his or her parents in the case of accompanied children- and the security forces report the child to the protection services.

However, according to OMCT's research, care for children on the move at risk has worsened since July 2023 and is now limited. In addition to constant mobility, which makes it difficult to stabilize the situation and provide lasting social or educational care, other factors explain this decline in the availability and quality of care.

Strong discrimination when providing care

According to information gathered by OMCT, the majority of children on the move referred to protection services and in need of protection would not have access to the alternative care solutions detailed above, despite their eligibility. Children on the move in need of protection and in an irregular situation are not assigned to alternative care solutions by the Child Protection officers placed by Child Protection Officers due to their nationality and administrative status or are denied access to state centers by center directors. **No children on the move residing in or transiting through Tunisia had access to the Center for Defense and Social Integration (CDIS) and Integrated Center for Youth and Children (CIJE) over the period studied,** even though in principle unaccompanied or separated children would be eligible for the activities and services provided by these centers.

According to the civil society organizations and child protection experts consulted for this study, decisions concerning children on the move are now centralized at ministerial level: despite goodwill at the technical level to find solutions for children on the move at risk, the organizations consulted regret the escalation to a higher level and lack of transparency of the decision-making process concerning children on the move, in a context of politicization of the migration issue and the absence of an independent judicial system. Difficult communication between local units and the central level prevents a clear and timely decision-making process.

79. This obligation applies without exception and derives from Tunisia's international commitments, notably the International Convention on the Rights of the Child (CRC), as well as the provisions of the 2022 Constitution and the Child Protection Code. These texts guarantee every child the right to protection, education and development in conditions that respect his or her dignity and best interest.

Reality: **the story of Jessica and her children**

Jessica is a woman originally from Burkina Faso, living in Tunisia with her children. In the summer of 2024, an organization reported Jessica's case to child protection services, citing her mother's psychiatric problems and a history of child abuse. The family judge ordered Jessica's emergency hospitalization in a psychiatric ward and the placement of her children in the Manouba center. However, the decision was not carried out by the local Child Protection Officer, who failed to respond - the children and mother remained on the streets in the middle of a heatwave. The next day, after Jessica attempted suicide, the DPE and the police finally executed the court order.

Lack of staff training and structures adapted to children on the move

At the time of finalizing this report (December 2025), there is no public structure specifically dedicated to children on the move, providing dignified and sustainable alternative care and protection solutions. At the same time, Child Protection Officers, social workers and judges have little or no training in the specific needs of children on the move, and are consequently unable to adopt a protection approach sensitive to the intersectional vulnerabilities inherent in displacement (gender, nationality, legal status, experiences of violence during the migratory journey, etc.). Resistance to the adoption and operationalization of an inclusive and universal protection framework thus prevents the integration of children on the move into the child protection system.

«Health and social services in the field are not equipped to deal with children on the move»

A Tunisian social worker

Lack of coordination between those involved in protecting children on the move

Coordination between national authorities, UN agencies and civil society, which is essential to ensure effective and sustainable referral and quality care for children on the move, in line with the best interest of the child, is already weak for all children. According to the experts consulted for this study, this coordination has become **extremely limited since May 2024 and the gradual narrowing of civic space** - when organizations prominent in assisting children on the move, such as the Tunisian Council for Refugees (CTR) and Terre d'Asile Tunisie (TAT), had to suspend their activities and some of their leaders were placed in pre-trial detention. Coordination is now mainly limited to referrals from CSOs to Child Protection Officers. This prevents an effective, concerted management of children on the move in care, who are complex cases often requiring multidisciplinary assistance involving a multiplicity of actors, including civil society organizations.

80. One structure has been designated by the authorities for the reception of foreign children over the age of six, the Manouba center, but this center is a temporary solution (see below) that cannot constitute an alternative protection solution aligned with international standards, while it exerts considerable pressure in terms of capacity and may delay care.

Assessment and formal determination of the child's best interests

The principle of the best interests of the child obliges States to establish procedures and mechanisms for assessing and determining the best interests of all children under their jurisdiction.⁸¹ Two processes can be distinguished: *Best Interest Assessment (BIA)* and *Best Interest Determination (BID)*.

Best interest assessment is a process in which the best interests of the child are continuously pursued as the overall goal of any intervention on behalf of an unaccompanied or separated child through the cycle of displacement. **The best interest determination**, based on the assessment of the child's best interests,⁸² is a formal, multidisciplinary procedure culminating in the determination of a preferred durable solution for the child according to his or her situation.⁸³ UNHCR and IOM can assist actors (child protection, health, justice, social services) in these processes to identify durable solutions for unaccompanied and separated children.⁸⁴ For unaccompanied children, family reunification should be the priority, and return should only be chosen in the best interests of the child.⁸⁵ Return cannot be voluntary if no other solution is proposed.

In Tunisia, BID panels have been set up to coordinate decision-making concerning children on the move. Organized by IOM, they bring together child protection services (DGPE) under the aegis of MFFES, regional social affairs departments, UNICEF and, where necessary, UNHCR and, until May 2024, civil society organizations. The task of these panels was to assess the children's situation, determine their best interests and propose lasting solutions - such as family reunification, return to the country of origin, resettlement in a third country or local integration - before a decision was taken by the family judge.

Until January 2025, the DGPE's presence was direct, via a simple e-mail invitation. Since then, however, each new BID panel meeting requires a verbal note from IOM to the Ministry of Family, Women, Children and Seniors (MFFES). This change in protocol, by potentially delaying processes, no longer respects the best interests of children on the move, who are nevertheless considered to be the most vulnerable. Furthermore, BID Panels concerning children under UNHCR protection have been suspended since November 2024. As a result, the frequency with which these panels are held has fallen sharply, paralyzing the implementation of these solutions.

81. UNHCR, *UNHCR Best Interest Guidelines 2021: Assessing and Determining the Best Interests of the Child*, 2021, p. 31. See also General Comment No. 14 (2013) on the right of the child to have his or her best interests a primary consideration, CRC/C/GC/14.

82. CRC/C/GC/22 - CMW/C/GC/3, 2017, §31.

83. UNHCR, *UNHCR Guidelines on Formal Best Interest Determination*, 2006, p. 10.

84. UNHCR, *UNHCR Guidelines on Formal Best Interest Determination*, 2006.

See also UNHCR, *UNHCR Best Interest Guidelines 2021: Assessing and Determining the Best Interests of the Child*, 2021.

85. UNHCR, *Notes on family reunification*, EC/SCP/17

Alternative care arrangements and protection solutions not readily available for children on the move at risk

There are several types of public centers and facilities for children at risk who have been placed in care by a family court judge. In principle, a child's placement in one or other of these facilities is based on an assessment of his or her eligibility, needs and the purpose of the care, in line with his or her best interest.

However, in reality, these solutions are not very accessible for children on the move considered to be at risk in Tunisia, for the following reasons, according to the experts consulted:

- **Difficulty of integration** in certain centers and host families for teenagers on the move, given their age.
- **Overcrowding** and impossibility of accommodating young children with their parents in public facilities.
- **Refusal of placement:** Despite a court decision ordering placement, refusals to integrate children on the move have been documented and confirmed over the period studied. According to the experts consulted for the research, the lack of available places, and referral to the Manouba CSOE, designated by the MAS as the structure to receive children on the move after the closure of the Zahrouni CPSE in 2024 (see below), were the main arguments justifying refusals to integrate into the centers.

Protection alternative care ill-suited to children on the move

According to OMCT's research, children on the move are nonetheless placed in state-run facilities by the family protection and justice services, albeit in very limited numbers and under difficult conditions, generally without access to education and in structures ill-suited to their long-term development and protection.

Placement in state-run facilities is motivated by the risks to the child's safety and well-being if he or she is not removed from this environment.⁸⁶ The following centers took in children on the move over the period November 2024 - April 2025:

- **INPE** took in several newborns and young children on the move separated from their parents at birth or after the intervention of protection services.
- **Sidi Bouzid CPSE:** Following the closure of the boys' pavilion, only young girls and women are now housed there - in a very limited number that does not reflect the protection needs of young girls on the move in Tunisia. Social workers have reported that the CPSE is not a suitable environment for vulnerable girls on the move - who cohabit with Tunisian children who are drug users or have just been released from correctional centers for delinquency or prostitution.

86. Art. 46 CPE.

- **The Zahrouni CPSE**, which previously housed young children at risk in the Greater Tunis region, including unaccompanied children on the move, was closed in January 2023 following tensions between children placed at the center and the neighboring host community.⁸⁷ Acts of violence committed against the children on the move housed at this center were reported by several people consulted for this study.
- **The Manouba CSOE**: Designated by the State as the center dedicated to the reception of foreign minors after the closure of the Zahrouni CPSE, this center received up to 30 persons, including children, who were housed at the same time - with an open regime. In 2024, at least 20 Sudanese child were released from detention.⁸⁸
- **The Sousse CEOS**: It is said to have taken in at least 8 people on the move, including unaccompanied and separated children, and single mothers on the move with their children.
- **The Sfax CEOS** received up to twenty children on the move in early 2025, referred from Sfax, Tunis, Sousse, Kairouan, the majority being unaccompanied or separated children, on release from detention or following the arrest of their parents and/or awaiting return to their country of origin via the IOM, as well as children on the move under the age of 12, for periods of up to a year - particularly those for whom return to their country of origin poses problems, either in terms of re-establishing family ties or security. According to information gathered by OMCT, there is currently no automatic notification of IOM or UNHCR in the event of a decision by the authorities to place children on the move in CEOS.

According to several of the experts consulted for this study, there is no political will on the part of the actors involved to provide children on the move placed in these centers with a long-term path to integration into Tunisian society. Several sources have confirmed that CEOS and CPSE are not designed to take in minors on the move, as the youngsters are sometimes better protected within their national and ethnic groups than in these insecure structures with violent environments.

Placement in the CEOS would be a measure of «last resort» for the social services, in the event of refusal of integration by the centers or the absence of other accommodation solutions.

Reality: **Aïssata's story**

Aïssata is a 17-year-old child from Cameroon. In 2024, she was deported from Tunisia to Libya. In Libya, she was raped and became pregnant. Having managed to return to Tunisia, she gave birth a few months later - outside hospital. Taken in charge by an association, she was reported to the child protection services for urgent measures of protection. Unfortunately, no center was available to house Aïssata and her baby. The latter was placed in a unit of the Institut National de Protection de l'Enfance (INPE), and Aïssata was granted visiting rights twice a week.

87. «Le ministère des affaires sociales décide de fermer le center de protection sociale des enfants de Tunis,» 20/01/2023, La Presse.tn.

88. Humanitarian source.

Placement in state structures against the best interest of the child⁸⁹

According to United Nations standards, alternative care for young children, especially under the age of 3, should be provided in a family setting.⁹⁰ This principle may be waived to avoid separating siblings, and in cases where the placement is of an emergency nature or is planned for a very short, pre-determined period, with the ultimate aim of returning the child to his or her family or adopting an appropriate long-term solution.

While it responds to an urgent need for protection to ensure the child's immediate safety, placement in state structures generates several problems specific to children on the move in terms of respect for their best interest, whether they are unaccompanied, separated or accompanied by their parents but separated by a court decision. If placement is necessary, it must enable the child's healthy development and not lead to further violations of his or her rights.

- **Placement in centers unsuited to the vulnerabilities of children on the move:** The institutions taking in these children are filled to capacity with limited resources. Accommodation conditions do not meet the specific developmental needs of children on the move, exposing them to the risk of further violations.
- **Placement conditional on a request for return:** Many placements of children on the move give priority to those who have expressed their wish to return voluntarily to their country of origin or to be reunited with their families. This situation can be explained by the lack of capacity at the Manouba center and the absence of skills and care techniques adapted to this category of children, as well as a willingness to support them pending their return. However, according to the organizations consulted by OMCT, access to certain public alternative care solutions is in fact conditional on a request to return to the country of origin - sometimes in contradiction with the child's best interest.
- **Family separation:** Family separation can have a serious impact on both parent and child. These placements are based on the preconceived idea of «bad parents» on the street. The authorities do not automatically launch a search to re-establish family ties or sometimes offload their responsibility to UN agencies. Family ties are not automatically maintained by the authorities when the parent is known, with the risk of prolonged family separation; visiting rights are not guaranteed to parents, nor even frequent telephone contact even if the family link is maintained.

89. The effects of separating children and placing them in state institutions are serious and long-lasting. Largely invisible, these children are particularly vulnerable to violence, neglect and abuse. The removal of a child from his or her family should only take place when it is not in the child's best interest to do so. Despite international provisions, the majority of states do not put in place prevention, protection and support mechanisms to reduce the number of children living in institutions. See **UN Guidelines for the Alternative Care of Children (A/RES/64/142)**

90. Resolution adopted by the UN General Assembly, Guidelines for the Alternative Care of Children, A/RES/64/142.

*«The best place for a child is in the family:
long-term placement in a center must be the last resort.»*

An expert in child protection

Over the period studied, OMCT documented several cases of placements of children on the move, including newborns, decided by a judge, resulting in separation from the parents and ultimately a breakdown in family ties. In practice, no alternative public care solution could accommodate children and their parents at the same time, leading to the risk of family separation.

Reality: the story of William and Mariam

William and Mariam are originally from Guinea. Living in Sfax with their 8-year-old son, the couple were arrested and forcibly moved to Algeria, without their son who remained in Sfax. On their return to Sfax several months later, William and Mariam contacted associations to find their son. After several weeks of administrative procedures, the couple learned that their son had been placed in a public institution by the courts. Both parents had great difficulty in obtaining regular visitation rights and telephone contact with their son.

United Nations shelters: unsuitable solutions

United Nations shelters take in children on the move who need protection. However, they do not represent solutions adapted to children's needs, and can in no way fill the gap left by the state in terms of alternative care arrangements:

- **Limited access due to strict eligibility criteria:** They are intended for specific population categories, namely refugees and vulnerable asylum-seekers for UNHCR shelters, and people enrolled in the Assisted Voluntary Return and Reintegration program for IOM shelters. The majority of children on the move who are at risk are therefore not eligible.
- **Weak capacity:** Very few places are available in a context of a lack of safe, sustainable accommodation solutions for people on the move in Tunisia. In April 2025, some 154 unaccompanied children were housed in UNHCR shelters, while over 500 unaccompanied children under international protection were homeless.
- **Temporary solutions neither designed nor implemented to meet the needs of children at risk:** These temporary shelters are not sustainable solutions for children at risk - especially as there are no shelters specifically dedicated to accommodating children in southern Tunisia, and living conditions are not adapted to a child's development and fulfillment. However, the complexity of identifying durable solutions (including voluntary return to the country of origin, family reunification or other third-country solutions for refugee children) means that children remain for long periods in these shelters, which do not fully guarantee structured coordination with other basic services, such as education. This creates a gap in inclusion and integration for children on the move in Tunisia, who thus find themselves stranded without access to services.

91. Humanitarian source.

«I'd rather go back to Sudan, because here I have nothing to live for»:

The consequences of the absence of lasting solutions and effective protection

According to OMCT's data collection, more and more children on the move in Tunisia are developing a sense of isolation and disengagement from the assistance provided in the face of a lack of prospects and appropriate support. Faced with a climate of uncertainty, discrimination and stigmatization, traumatic experiences on migration routes, and persistent obstacles to accessing social or institutional assistance, children on the move often lose faith in the possibility of obtaining protection and accessing lasting solutions. This loss of bearings, combined with psychological distress and family estrangement, leads many of them to consider or undertake a return to their country of origin, including countries covered by UNHCR's no-return policy such as Sudan, or to attempt a departure to other neighboring countries, such as Libya, sometimes in extremely precarious conditions. This phenomenon highlights the urgent need for reinforced psychosocial support and effective short-, medium- and long-term protection responses to prevent the exacerbation of their suffering and vulnerability, and their recourse to high-risk migratory trajectories.

Alternatives to placement not explored for children on the move

As the alternative care arrangements offered by the child protection system are inaccessible, unsustainable and ill-suited to the needs of children on the move, other solutions to placement in state structures offer an alternative to the inefficiency of institutional care.

- **Centers run by civil society organizations**

According to information gathered by OMCT, with the suspension of the activities of a significant number of civil society organizations that provide accommodation and protective care solutions for families and children on the move in vulnerable and dangerous situations, these solutions have in practice become largely inaccessible.

- **Foster care**

Foster care is rarely used by Tunisian family judges for children on the move and is made all the more complicated by the fact that the vast majority of unaccompanied children are teenagers (boys) aged between 15 and 17 - which, by its very nature, makes their integration into foster families difficult. According to the experts and organizations consulted, the current racist and xenophobic context adds to the fact that few families are available to take in sub-Saharan children.

- **Other alternative solutions**

The Tunisian authorities are reportedly refusing to implement new alternative care arrangements implementation of new alternative care arrangements by the United Nations or other CSOs. Prior to May 2024, semi-independent living, community-based solutions had been set up by CSOs and UN agencies and accepted by the authorities, in the form of shared accommodation for young unaccompanied children under the guardianship of a responsible adult from the same community - or under the authority of CSOs and their social workers. The children on the move hosted in such shelters were reportedly expelled in May 2024 following the suspension of the activities of several CSOs.



CONCLUSION

This research highlights structural weaknesses in Tunisia's public child protection system, designed to provide protection for all children at risk, without discrimination or distinction of status or nationality. The principle of the best interest of the child must be the primary consideration in all government measures. Yet current practices are often at odds with this principle and the obligations that flow from it. In this context of restricted access to protection, people and children on the move are deprived of both justice and rehabilitation measures - including psychological support, which is essential for the rehabilitation of victims. In the absence of reparation and rehabilitation, the processes of integration in the country of transit or destination, resettlement in a third country, or return and reintegration in the country of origin, cannot be sustainable. The stories and testimonies collected and analyzed in this report illustrate the inseparable link between respect for children's rights and the possibility of safe transition to adulthood, and how the current situation in Tunisia compromises both. The research confirms that children on the move who are at risk face the precariousness of a lack of legal status and social instability in the country of transit. Their right to child protection is violated and their right to child protection is violated, they are completely abandoned by the state and left with no options.

RECOMMENDATIONS

- Guarantee equal access to national child protection services for children on the move in accordance with national legislation, guaranteeing them equal access to care, public protection and care structures and specialized protection services.
- Ensure that all law enforcement, immigration and border authorities receive systematic, continuous and mandatory training on children's rights and child-sensitive procedures, in line with the principle of non-discrimination, the best interest of the child, the right to life, survival and development, and respect for the views of the child.
- Strengthen alternative care solutions and reception capacities, as well as specialized child protection measures for all children considered to be at risk, including unaccompanied and separated children.
- Recognize the positive role of civil society organizations implementing child protection programs, including shelter and protective care programs for children on the move, in coordination with the authorities and UN agencies.
- Reopen a public protection and care center in Greater Tunis, and make it accessible to all children regardless of status.
- Adopt and implement Standard Operating Procedures (SOPs - December 2024) by all child protection stakeholders, in particular the Ministry of Social Affairs.
- Relaunch the organization and holding of panels to determine the best interests of the child by the DGPE, in collaboration with civil society organizations and UN agencies.
- Avoid placing children at risk in protection centers housing adults with diverse needs, such as CEOS Sfax, and favor public centers specifically dedicated to the protection of children at risk.
- Allocate adequate, sustained and transparent public resources are allocated to preventive measures aimed at protecting all children from situations of risk, neglect, exploitation, violence, and other harmful circumstances and to the provision of comprehensive and adapted support services, including post-traumatic therapy, for child victims of violence.
- Enable the maintenance of family ties between children placed with their families in public protection centers.

ACKNOWLEDGEMENTS

The World Organisation Against Torture (OMCT) works with 200 member organisations who fight to put an end to torture and ill-treatment, help victims and protect human rights defenders at risk, wherever they may be. Together, we form the largest international group active in the fight against torture in over 90 countries. We strive to protect members of marginalized groups at risk of being the most vulnerable, including women, children, indigenous peoples, migrants and other marginalized groups.

In Tunisia, OMCT's direct assistance program, SANAD, provides holistic, tailor-made support to victims of torture and ill-treatment. We combine field expertise with advocacy to inspire reform, undertake strategic legal action and support institution-building in partnership with Tunisian civil society and government.

OMCT aims to promote information, documentation and the study of the human rights situation of all people, including migrants, refugees and asylum seekers, as well as stateless people. The organization is committed to combating discrimination, racism and xenophobia, and aims to promote and protect in society the affirmation of the principles of equal rights, equal opportunities and respect for dignity, without distinction of origin, nationality, language, religion, gender or political opinion.

Our warmest thanks go to the partner organizations, researchers, experts, human rights defenders, journalists and associations assisting people on the move, who shared their views on the human rights situation of children on the move in Tunisia. This report has been greatly enriched by their views and perspectives. Civil society organizations in Tunisia currently play a crucial role in promoting the rights of people on the move.

Special thanks go to the direct victims of violations who have shared their suffering and relived their experiences of violence; through this report, OMCT hopes that their voices can be heard. People, including child victims of human rights violations, are actors for change and in the fight against impunity, and OMCT salutes their commitment.

All quotes have been anonymized to respect the identity of the interviewees. The contents of this report are the sole responsibility of OMCT. This report is intended to inform OMCT's future work and positioning on the subject and will be shared with interested partners and stakeholders.

This report is based on primary and secondary research and programmatic learning.
The content of this document is the sole responsibility of the OMCT.

The English version of this report is a translation of the French report
« FOCUS BRIEF 5. Capacités et réponses des acteurs étatiques
et non étatiques aux besoins et aux risques des enfants en déplacement. »

