

NGO intervention on Programme of action: Areas in need of support – reception and admission (Part III.B.1)

Agenda item 3

Dear Chairperson,

This intervention reflects a diversity of views among NGOs.

The section on **areas in need support** now presents better linkages with contributions to be made through responsibility-sharing mechanisms and we stress that the main objective should remain to improve the lives of refugees. In this perspective, this section rightly promotes a gender- and age-sensitive response, with references to specific needs of older persons and survivors of SGBV. We also urge the inclusion of disability as a cross-cutting issue and further mainstreaming of youth.

More specifically, we welcome a strengthened **early warning, preparedness and contingency planning** section, highlighting internal displacement. Establishing national coordination mechanisms and risk mitigation measures is positive and should include NGOs, refugee and host communities. Standby capacities are also essential and the compact should explain how these will be constituted.

Under **immediate reception arrangements**, training and capacity development must be human rights-sensitive and extend to all border, reception and admission staff. Efforts must also be made to save the lives of asylum seekers in transit, including through search and rescue. Such actions should not be criminalized. Support for identifying those who have died or gone missing and informing family members is also essential. Lastly, we reiterate the need for regular and independent monitoring of reception conditions to ensure adherence to human rights standards.

We note that the section, **safety and security**, continues to privilege state security. Typically, refugees do not threaten national security. We therefore consider such language as disproportionate. While we welcome protection-sensitive screenings, we urge the addition of measures enabling refugees to access legal assistance and grievance-handling mechanisms. We also reiterate the vital role national human rights organisation play in this perspective.

We welcome the reference to preventing human trafficking under **registration and documentation**. While welcoming references to data protection standards, we reiterate the sensitivity of identity-related information, especially when refugees flee individual persecution. During registration and documentation, support will also be needed to ensure all persons of concern are able to access information and legal assistance in a language they understand. We reiterate that asylum seekers whose claims have been rejected must continue to access basic services and legal assistance.

Under **addressing specific needs**, welcoming references to developing non-custodial and community-based alternatives to detention for children, we encourage extending this to all those with specific needs. These must be accompanied with freedom of movement and the right to privacy. We repeat that include

refugee children should be included in national protection systems, rather than in parallel services. Identification of safe spaces for people with specific needs should be re-introduced. Furthermore, we reiterate that medical services must remain child- and youth-friendly as well as gender- and disability-responsive. They must include all preventive and essential healthcare services, particularly to address SGBV-related trauma such as post-rape care.

In identifying international protection needs, we welcome references to international and regional instruments, which recognise various drivers of displacement. We consider that broader interpretations of protection risks should contribute to determining international protection needs. As such, mixed movements must be mentioned, along with the right to seek asylum and clear rejections of push-backs policies. In large refugee movements, group-based recognition remains key, albeit with consideration for the vulnerabilities and specific needs of asylum seekers.

We welcome further details on the **asylum capacity support group**. NGOs and refugees stand ready to help upholding the integrity, fairness, efficiency and adaptability of asylum systems and share good practices. The support group must also strive to incentivize all countries – not just usual hosts – in welcoming refugees. This support must not only lead to technical improvements but result in a broadening of the asylum space, clearly rolling back instances of *refoulement*.

Finally, we are disappointed to note that references to disaster-related processes, including the Nansen Initiative, have been gradually removed. These reflect advances in international efforts to mobilise a predictable and sustained response to disaster displacement. Blinding ourselves to emerging challenges will not make them go away.

A detailed version of this intervention is available on icvanetwork.org

Thank you.