



CONFERENCE OF INGOs
OF THE COUNCIL OF EUROPE

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COMMITTEE ON MIGRATION ISSUES OF THE CONFERENCE OF INGOs OF THE COUNCIL OF EUROPE

*Accommodation of migrants, a major issue
for the respect of Human Rights.*

RECOMMENDATION ON THE GUIDELINES “TOYS FOR CHILDREN AND FAMILIES DURING RETURN”, Frontex

September 9, 2025

Preamble

This document has been prepared within the framework of the **Committee** of migration issues of the Conference of INGOs of the Council of Europe, in close cooperation with the **Committee of the Rights of the Child in Europe**.

It is based on:

- the standards and principles enshrined in the **UN Convention on the Rights of the Child (CRC)**, in particular the right to play (Article 31), participation (Article 12), protection from violence (Article 19), the principle of non-discrimination (Article 2), and the best interests of the child (Article 3).
- the experience and good practices identified in several member States, in particular the Portuguese model “**Cantinho da Criança**” (**Children’s Corner**), implemented both in the medical consultations of the National Health Service and in the courts, designed to create child-friendly spaces combining play, books, and the presence of trained support professionals.

These recommendations reflect a collaborative and inter-committee approach, bringing together complementary expertise to ensure that the outcome is **legally sound, operationally feasible, and child centred**. They are intended to inspire the establishment of similar initiatives in the context of migration and return, in full compliance with the fundamental rights of children.

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The reviewed guidelines show partial compliance with the fundamental principles of the CRC. They emphasize a child-centred approach, consistent with Article 3 (Best interests of the child), partially recognize the child’s right to choose their toys (Article 12 – Participation), and stress safety measures (Article 19 – Protection from violence and danger).

However, several aspects need to be strengthened, particularly regarding Article 12, which affirms the child’s right to freely express their views and to be heard in any decision affecting them. While the guidelines mention play and safety, they do not foresee any mechanism allowing children to provide feedback on the programme itself.

Gaps and recommendations

Participation (Article 12)

- Establish means for children to give their opinion on the toys and the layout of the play area.
- Regularly gather children’s views through age-appropriate methods (short conversations, drawings, sticker systems).
- Involve children in decisions regarding the selection of toys and the organization of the space.
- Respect children’s choice not to play with certain toys or not to participate.

Non-discrimination and cultural sensitivity (Article 2)

- Provide toys that reflect cultural, religious, and linguistic diversity.
- Avoid stereotyped or culturally inappropriate toys.
- Take dietary restrictions into account when distributing edible items or toys representing food.

Right to information and privacy (Articles 16 and 17)

- Explain to children, in age-appropriate language, the purpose of the play space and their freedom to use it.
- Provide simple, child-friendly visual cues to support autonomy.
- Arrange the space to allow some degree of privacy while ensuring appropriate supervision.
- Offer children quiet moments and the option to play alone.

Right to play (Article 31)

- Recognize play as a fundamental right contributing to children's well-being and development, not merely as a distraction during return procedures.

Proposed revisions to the principles

Child-centred approach: Respect the child's right to play, to express themselves, and to have their choices and comfort considered, in line with their age, stage of development, and cultural context.

Child participation (new principle):

- Directly ask children about the activities and toys they enjoy.
- Involve them, where appropriate, in organizing the space.
- Create simple, age-appropriate means for continuous feedback.
- Respect children's decision not to participate in play.

Suggested additions to the “Do’s and Don’ts”

- Do not assume that all children want to play or need to be distracted.
- Do not use play as a tool for control or behaviour management.