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Invisible No More: National Solutions for Protecting Unaccompanied and Separated Migrant Children in Egypt

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THE PUBLIC POLICY HUB

Policy Paper

Invisible No More: National Solutions for Protecting Unaccompanied and Separated Migrant Children in Egypt



Prepared by:
Enas Abdel Azim
Noran Khorsheed
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Under the Supervision of:
Dr. Mohamed Elkaramany
Assistant Professor
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«The opinions in the paper are those of the authors and do not reflect either AUC or IOM policies or views. They are published to stimulate further dialogue on issues and challenges facing Egypt in an attempt to expose graduate students to practical policy solutions. »

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In memory of Dr. Laila ElBaradei



We would like to pay special tribute to the memory of the late Dr. Laila ElBaradei, Founder of the Public Policy Hub and the former Project Principal Investigator, who left us in April 2025. Her visionary leadership and dedication to public policy education and training have left a profound legacy. Her unwavering commitment, wisdom, and belief in the power of collaboration and capacity building continue to inspire everyone who has had the privilege of working with her.

This work stands as a testament to her lasting impact and the values she championed. May her soul rest in peace.

List of Acronyms

| | |
|--------------|--|
| 3RP | Regional Refugee and Resilience Plan |
| ACRWC | African Charter on the Rights and Welfare of the Child |
| AI | Artificial Intelligence |
| BIA | Best Interests Assessment |
| BID | Best Interests Determination |
| CBO | Community-Based Organization |
| CRC | Convention on the Rights of the Child |
| DAC | Development Assistance Committee |
| ECWR | Egyptian Center for Women's Rights (based on «ECWR, 2024») |
| ERRRP | Egypt Refugee and Resilience Response Plan |
| EU | European Union |
| GCM | Global Compact for Migration |
| GoE | Government of Egypt |
| IDP | Internally Displaced Person |
| ILO | International Labour Organization |
| IMF | International Monetary Fund |
| INGO | International Non-Governmental Organization |
| IOM | International Organization for Migration |
| MENA | Middle East and North Africa |
| MoFA | Ministry of Foreign Affairs |
| MoI | Ministry of Interior |
| MoM | Ministry of Manpower |
| MOSS | Ministry of Social Solidarity |
| NCCM | National Council for Childhood and Motherhood |

| | |
|-----------------------|---|
| NCCHT | National Coordinating Committee on Combating Human Trafficking |
| NCCPIM&TiP | National Coordinating Committee for Combating and Preventing Irregular Migration and Trafficking in Persons |
| NGO | Non-Governmental Organization |
| OHCHR | Office of the United Nations High Commissioner for Human Rights |
| OECD | Organization for Economic Co-operation and Development |
| PPH | Public Policy Hub |
| RLO | Refugee-Led Organization |
| RSD | Refugee Status Determination |
| SDGs | Sustainable Development Goals |
| SOPs | Standard Operating Procedures |
| StARS | St. Andrew's Refugee Services |
| UASC | Unaccompanied and Separated Children |
| UCY | Unaccompanied Child and Youth |
| UN | United Nations |
| UNHCR | United Nations High Commissioner for Refugees |
| UNICEF | United Nations Children's Fund |
| WHO | World Health Organization |

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Executive Summary

Egypt has a strategic geographical position as a significant destination and transit country for unaccompanied and separated migrant children (UASC). With a substantial and rapidly increasing migrant population, exacerbated by recent regional influxes, the country's public infrastructure and resources are experiencing considerable strain. While Egypt has demonstrated its commitment to child rights through the ratification of key international instruments like the Convention on the Rights of the Child (CRC) and the African Charter on the Rights and Welfare of the Child (ACRWC), UASC in the country nonetheless face complex protection challenges, including legal visibility concerns, risk for exploitation, and barriers to social inclusion. The actual number of UASC may also exceed official registrations, influenced by factors such as under-registration and administrative considerations.

In addressing these complexities, the Egyptian government has undertaken several commendable initiatives to enhance UASC protection. Notably, the National Council for Childhood and Motherhood (NCCM) developed comprehensive Standard Operating Procedures (SOPs) in 2020, establishing a structured national approach for case management and essential service provision, in line with both national legislation and international obligations. Further progress is evident in the new national asylum law enacted in November 2024, which prioritizes vulnerable individuals and offers fee exemptions for services, along with the Ministry of Interior (MOI)'s decision to extend residence permit validity to one year, thereby fostering greater stability and access. The launch of the Egypt Refugee and Resilience Response Plan (ERRRP) in June 2025 further signifies a proactive national leadership role in addressing refugee needs.

Despite these significant advancements, opportunities exist to further strengthen the current protection framework and its implementation. Administrative processes, such as the ongoing transition of Refugee Status Determination (RSD) to local authorities and resource limitations affecting the United Nations High Commissioner for Refugees (UNHCR), can contribute to registration delays and impact service accessibility. From a legal perspective, the framework's evolution and the application of international conventions, alongside practical aspects of residence permit processes, present persistent challenges, especially for UASC. Service provision, currently relying significantly on the vital contributions of international and non-governmental organizations, could benefit from further integration into state systems to ensure more equitable and sustainable support. This policy paper comprehensively examines these areas for development across legal, administrative, and service provision frameworks, proposing actionable reforms to strengthen institutional coordination, standardize care practices, and further align child protection efforts with Egypt's broader developmental priorities. This is through expanding the national family-based alternative care system to include refugee and migrant UASC,

developing child-friendly asylum-seeking procedures, and formalizing Refugee-Led Organizations (RLOs) and Community-Based Organizations (CBOs) for UASC support.

Introduction

Egypt occupies a critical geographic position, making it a significant destination and transit country for unaccompanied and separated migrant, refugee, and asylum-seeking children (UASC). As of 2022, Egypt hosts approximately 9 million international migrants, making it one of the largest migrant-hosting nations in Africa and the Middle East (IOM, 2022). Within this context, refugees and asylum seekers represent a distinct subset. Since 2023, the country has faced an unprecedented surge in refugee populations, further intensifying the complexities of child protection. As of June 2025, Egypt hosts more than one million registered refugees and asylum-seekers from over 60 nationalities, with Sudanese individuals comprising a significant 73% of this population, followed by Syrians at 13.5%. This dramatic rise in the number of places imposes immense pressure on public infrastructure and resources, which are already strained (UNHCR, 2025).

UASCs in Egypt face profound protection risks stemming from legal ambiguity, administrative inefficiencies, and inconsistent access to essential services (Hetaba, 2020; Elsaid, 2022). Despite Egypt's ratification of key international instruments such as the Convention on the Rights of the Child (CRC) and the African Charter on the Rights and Welfare of the Child (ACRWC), thousands of UASC remain trapped in cycles of legal invisibility, exploitation, and social exclusion (Human Rights Watch, 2023; IOM, 2024). As of June 2025, 10,403 UASC were registered with the United Nations High Commissioner for Refugees (UNHCR) in Egypt, but the actual number is likely much higher due to persistent under-registration, residence permit bottlenecks, and operational pressures resulting from recent regional influxes (UNHCR, 2025). In addition to the lack of parental care, these children, often fleeing conflict, persecution, or economic instability, encounter systemic barriers that expose them to exploitation, legal invisibility, and exclusion from essential services.

Recent efforts by the Egyptian government demonstrate a growing commitment to the protection of UASC on Egyptian land. In 2020, the National Council for Childhood and Motherhood (NCCM), a key governmental body responsible for child protection, developed Standard Operating Procedures (SOPs) for the Protection and Assistance of Child Asylum-Seekers, Refugees, and Victims of Migrant Smuggling and Trafficking. This manual establishes a structured national pathway for the case management and provision of essential services to these vulnerable children. The SOPs are grounded in national legislation, including Egypt's Constitution and specific laws on combating human trafficking and illegal migration, and international obligations. The manual aims to ensure that all children "in motion", including child asylum-seekers, refugees, victims of trafficking, and smuggled migrants, receive protection from violence, abuse, and exploitation, and enjoy their fundamental rights without discrimination. Furthermore, the document is designed to improve coordination among a wide array

of stakeholders, including various Egyptian governmental ministries (such as Interior, Social Solidarity, and Education), other national committees such as the National Coordinating Committee for Combating and Preventing Irregular Migration and Trafficking in Persons (NCCPIM & TIP), international organizations such as UNHCR, United Nations Children's Fund (UNICEF), and the International Organization for Migration (IOM), and local civil society organizations (CSOs). By delineating clear roles and responsibilities for these diverse actors, the SOPs seek to streamline the delivery of protection and assistance services, ensuring a more coherent and effective national response to the challenges faced by UASC in Egypt ([NCCM, 2020](#)). Another pivotal development is the new national asylum law, enacted in November 2024, which establishes a permanent Committee for Refugee Affairs and explicitly prioritizes the examination of asylum applications from vulnerable individuals, including unaccompanied children. This law also grants exemptions from fees for health, education, and justice services for refugees ([AUC APS, 2025](#)). Another commendable example is recent decision of the MoI to extend the validity of the residence permits for asylum seekers and refugees in Egypt to one year, "enhancing the protection environment for refugees and asylum-seekers in Egypt by promoting greater stability, reducing administrative burdens, and facilitating improved access to essential services, including healthcare, education, and livelihood opportunities, as well as access to birth certificates." ([UNHCR, 2025](#)). Moreover, the launch of the Egypt Refugee and Resilience Response Plan (ERRRP) in June 2025, a nationally owned comprehensive refugee response plan, further signifies a strategic move towards national leadership and coordination in addressing the needs of refugees and host communities ([UNHCR, ERRRP, 2025](#)).

Despite these commendable strides, there is still room for improvement in the current protection framework for non-Egyptian UASC. At the field level and as of the present moment, the current protection framework often reveals a significant gap between policy existence and its effective implementation. Administratively, while the new asylum law aims to enhance the asylum seekers and refugees' access to basic services, it entails the transition of the refugee status determination process to local authorities, which may present significant challenges by straining the current institutional capabilities as well as exacerbating administrative inefficiencies. On the other side, UNHCR currently faces chronic funding shortages, which lead to increased delays in the registration processes, leaving many without legal protection and therefore access to services ([AUC APS, 2025](#)).

Legally, while Egypt has made important commitments on paper to uphold the rights of all children within its borders, including refugee, asylum-seeking, and migrant children, a significant gap remains between these legal obligations and the reality on the ground. This gap becomes particularly visible when considering the country's adherence to the Convention on the Rights of the Child (CRC), which

Egypt has ratified in full, thereby assuming binding responsibilities to protect children's rights regardless of their nationality or legal status, in line with the core principles of non-discrimination (CRC Article 2) and the best interests of the child (CRC Article 3). However, the framework is fragmented by Egypt's historical practice of delegating significant refugee responsibilities to UNHCR since 1952 due to the absence of a national asylum system. Moreover, Egypt has maintained reservations on key articles of the 1951 Refugee Convention, such as those concerning elementary education, public relief, and labor legislation, which directly prevent refugees from receiving the same rights as nationals, creating systemic barriers despite the country's ratification of the convention. This demonstrates a fragmentation on the policy level in the application of international standards ([Hetaba, 2020](#)). Moreover, despite the government's decision to extend the validity of the residence permits, the process to obtain and renew such permits remains cumbersome and lengthy, often requiring asylum-seekers and refugees to make multiple trips to Cairo, incurring significant costs and lost income, and, more importantly, lacking child-friendly assistance for UASC ([Jones, 2024](#); [Sharafeldin, 2020](#)). Another major practical barrier is the frequent demand by immigration authorities for a valid passport in addition to the UNHCR card for permit renewal, a requirement that many refugees cannot fulfill due to severed ties with their home countries ([Hetaba, 2020](#)). Lastly, individuals who have applied for a residence permit and received a reference number from the Ministry of Foreign Affairs (MoFA) are not considered to have a valid permit during the waiting period, making them vulnerable to detention at checkpoints ([Sharafeldin, 2020](#)).

In terms of service provision, an unideal landscape is created by the reliance on international and non-governmental organizations (NGOs) to deliver essential services, often filling critical gaps where governmental provision is insufficient. This creates a fragmented landscape where comprehensive coverage is affected by capacity limitations and funding shortages faced by these organizations, leading to stark disparities in access, especially between registered (with UNHCR) and unregistered UASC. Additionally, the existing system does not comprehensively address the complex needs and challenges of UASC, nor does it foster long-term sustainable pathways for their integration into Egyptian society due to structural barriers. NGO projects are predominantly short-term (one or two years), designed for emergency relief rather than sustainable development, despite the protracted nature of the refugee situation in Egypt. Furthermore, it can be argued that reliance on underfunded NGOs and UN agencies for service delivery creates a donor-driven model that lacks sustainability, diverting state resources and complicating long-term planning. Additionally, the costs that organizations spend to provide comprehensive legal protection cannot be accurately determined or calculated due to the lack of detailed tracking and data ([El Hussein, 2021](#); [Elsaid, 2022](#)). While the Egyptian government, through NCCM, has developed the previously mentioned comprehensive SOPs for the protection and assistance of child asylum-seekers, refugees, and victims of migrant

smuggling and trafficking, the practical implementation of these policies remains significantly challenged; the realities on the ground suggest a gap between policy and practice. As evidenced in discussions at the Public Policy Hub Roundtable held on April 10th, 2025 (PPH Roundtable Discussion, 2025), various stakeholders highlight persistent systemic and operational hurdles that impede the effective delivery of the mandated protections and services, pointing to areas where the framework's ambitious goals face practical limitations. Examples of such limitations include but are not limited to (a) a notable lack of awareness among refugees and asylum seekers themselves regarding available services, despite these formalized SOPs having been developed; and (b) while shelters for children at risk exist, managed primarily by the Ministry of Social Solidarity (MoSS) as per the SOPs, and, at the policy level, all eligible children are entitled to physical protection and shelter, ground-level management practices can sometimes lead to the denial of access for some children requiring such protection; and lastly, (c) confusing redundancy observed between various shelters, particularly those managed by MoSS, leading to differing mandates and eligibility criteria that complicate access for children in need.

Needless to mention that the economic strain on Egypt due to regional conflicts and geopolitical instability is significant. The influx of undocumented migrant children, exacerbated by crises such as the Sudanese civil war, places immense pressure on Egypt's social services and labor markets. Many UASC are forced into hazardous informal labor like street vending or domestic work due to legal barriers to education and formal employment ([Elkorashy, 2023](#)). This situation not only perpetuates cycles of poverty but also undermines Egypt's Sustainable Development Strategy (Vision 2030), which prioritizes human capital development and social inclusion (Ministry of Planning and Economic Development, 2023). The arrival of an estimated 500,000 official Sudanese refugees and approximately 1,200,000 new Sudanese arrivals since 2023 further highlights the scale of this challenge, straining housing, healthcare, and education systems already under pressure ([Albazar, 2024](#)).

Addressing the systemic gaps facing UASC is not merely a humanitarian necessity; it is essential for Egypt's social cohesion, national security, and international credibility. Strengthening the child protection system will enhance Egypt's leadership role in responsible migration governance, support the realization of Egypt's Vision 2030 goals, and contribute to broader regional stability at a time when migration dynamics continue to reshape the geopolitical landscape.

Addressing gaps in Egypt's protection system for UASC and other refugees becomes a necessity with significant benefits for the country's national development, economy, public systems, and international standing. Investing in youth, including UASC, is crucial for building healthy and sustainable societies, creating a "win-win

situation” for both Egypt and its hosted populations (Hetaba, 2020), as properly integrated refugees can contribute to economic growth (Elkorashy, 2023). Economically, facilitating their access to formal employment increases gains for Egypt and protects them from exploitation, reducing their dependency on aid, while providing technical skills to forcibly displaced populations enhances employment and development (Andrade, 2021). The presence of international migration organizations like UNICEF, UNHCR, and IOM also brings international funding that translates into development funding for the broader Egyptian population. For instance, in 2014, the UNHCR allocated \$1.4 million to the Egyptian government for the refurbishment of Egyptian schools, accessible to certain refugee nationalities (Norman, 2024). Furthermore, revising decrees to allow refugee children to be legally fostered by their communities would bring their care, education, and healthcare under state supervision for better monitoring (Maxwell, 2004; Sherbiny, 2015), and supporting enhanced data collection on migrants and refugees would enable “more accurate assessments of actual needs,” recalibrate financial support negotiations, and help “dispel exaggerated refugee and migrant estimates” (Abdel Fattah, 2021).

This policy paper offers a comprehensive review of the current frameworks in Egypt related to UASC, encompassing legal, administrative, and service provision aspects. It explores contributing factors to existing challenges, such as areas where legal mandates could be clarified, opportunities for enhancing bureaucratic efficiency, and potential for more integrated governance.

The paper aims to be a constructive resource, proposing actionable policy recommendations designed to foster stronger institutional coordination, standardize care practices, and further align child protection efforts with Egypt’s broader developmental priorities. By collaboratively addressing these areas, Egypt could translate its humanitarian commitments into robust, sustainable, and rights-based outcomes for UASC, simultaneously contributing to the nation’s economic and social well-being.

This policy paper is divided into the following segments:

Section 1: Problem Statement: Providing a detailed overview of the context and scope of the UASC issue in Egypt.

Section 2: Review of Current Policies: Offering a constructive assessment of current practices and identifying areas for enhancement across legal frameworks, administrative systems, and service provision, delving into the underlying causes of challenges faced by UASC.

Section 3: Policy Alternatives: Presenting policy alternatives that are meant to complement Egypt’s national development agenda, enhance institutional coordination and capacity, and ensure that international commitments are effectively realized through sustainable, rights-based outcomes for all children.

Section 4: Conclusion and Recommendations: Finally, and after carefully evaluating the feasibility of all the proposed options, the policy paper makes the following recommendations to enhance the protection landscape for migrant and asylum-seeking UASC: i) Expanding the National Family-Based Alternative Care System to include Refugee and Migrant Children UASCs; ii) developing Child-Friendly asylum-seeking procedures for UASC within the framework of the new Asylum Law; and iii) formalizing RLOs for UASC Support in Egypt.

I. Problem Statement

A. Problem Identification

UASC in Egypt represent one of the most at-risk groups within the country's migrant, refugee, and asylum-seeker population. As of June 2025, 10,403 UASC were registered with UNHCR (UNHCR, 2025). However, this figure likely underrepresents the actual number due to widespread under-registration and gaps in age disaggregation; it is currently impossible to quantify precisely how many UASC are present in the country. Several factors contribute to this under-registration: first, the lack of systematic child-specific screening mechanisms at border points and in urban centers means many UASC are not identified upon arrival (IOM, 2025). Second, UNHCR faces mounting operational pressure in the context of periodic mass influxes, such as from Sudan, which have overwhelmed existing registration infrastructure. Severe backlogs in registration are common, resulting in long delays before individuals, including children, are added to the protection system (UNHCR, 2025; Bahar, 2024). Third, the requirement for residence permits to access services introduces additional administrative burdens. Due to high demand and limited capacity within the MoI, the processing of these permits can take up to two years, during which children remain without legal status or full access to services, unless they are registered with UNHCR. Together, these factors compound legal invisibility and contribute to prolonged vulnerability for unregistered UASC. Psychosocial distress is pervasive among UASC, resulting from displacement trauma, family loss, and the stress of navigating life without adult support. This emphasizes the negative impact of disrupted caregiving and the lack of structured mental health services on children, noting high levels of anxiety, depression, and behavioral symptoms. Even basic developmental needs- such as play and recreation- are often neglected (UNICEF, 2024).

Education access is another critical gap, although Egypt formally allows migrant and refugee children from certain nationalities to enroll in public schools (Ministry of Education [Egypt], 2014; Hussein, 2023), UASC frequently face bureaucratic hurdles; reports show that the main reason for the high rate of non-enrolment is the financial strain caused by school fees and associated

costs. Other contributing factors include challenges in obtaining the necessary documentation for school admission, insufficient access to information, or cases where applications are submitted but subsequently rejected (UNICEF, 2024). Many adolescents have aged out of compulsory education or lack sufficient Arabic proficiency, leaving them with no viable schooling pathway (Refugees International, 2025).

Economic insecurity is nearly universal among UASC. Without a legal guardian or access to lawful work, and with nearly half of Sudanese displaced children in Egypt currently out of school, a situation highlighted by recent UNICEF surveys, many face heightened risk of engaging in informal or hazardous labor, including street vending, agriculture, or domestic work. (UNICEF, 2024; Elkorashy, 2023; Alhasn, 2025). Girls face gender-specific risks, including early marriage and domestic servitude, particularly in unregulated housing settings (Sherbiny, 2015; Elsaid, 2022).

A major structural factor influencing these vulnerabilities is the ongoing development of Egypt's national asylum system. Although a domestic asylum law was enacted in December 2024, the government is currently in the process of drafting the executive bylaws and establishing implementation mechanisms. As this transition unfolds, Refugee Status Determination (RSD) continues to be managed by UNHCR, and the modalities for shifting to a state-led asylum process are still being defined (Guindy, 2021; UNHCR, 2025). As the system evolves, important details remain under discussion, including the future role of UNHCR, the responsibilities of state agencies in registration, and the framework for refugee entitlements (Ayoub, 2021; Bahar, 2024). Access to core services, including healthcare, education, and cash assistance, currently remains with UNHCR for registration and the acquisition of residence permits from the Mol. Yet, due to high demand and limited processing capacity, obtaining residency permits often takes up to two years, as the new appointments are now available from September 2027 (Refugees International, 2025; UNHCR, 2025). For UASC, this delay severely limits access to protection and protection of basic rights, and children without valid permits risk further marginalization.

Ultimately, Egypt has made legal commitments to protect unaccompanied and separated children. However, operational challenges leave many of these children facing significant risks. These include legal uncertainty, such as difficulties obtaining documentation or clarity on their status, economic hardship due to limited access to formal employment and reliance on financial aid, and psychosocial harm stemming from trauma, discrimination, and insufficient mental health support. Studies and field reports document that UASC in Egypt may experience detention, exploitation, barriers to accessing services, and emotional distress, especially in the absence of robust guardianship and individualized care (Laban

& Hassanein, 2021; Shokr & Salama, 2018). While civil society organizations and UN agencies provide essential support to UASC in Egypt and coordinate closely with national counterparts through established protocols and a national task force, the collaborative process can be complex and time-consuming. The involvement of numerous governmental entities, such as NCCM, NCCPIM&TiP, MOSS, and MoFA, requires extensive communication and coordination, which can sometimes lead to procedural delays and obstacles. As highlighted in the PPH Roundtable Discussion (2025), coordination between governmental bodies often constitutes a significant time hurdle due to the scale of inter-agency engagement required.

To address these interconnected vulnerabilities, this policy paper is structured around four core pillars: (1) Legal frameworks, (2) Administrative systems, (3) Service provision, and (4) Financial causes.

It seeks to identify systemic gaps across these domains and analyze how they intersect to contribute to challenges in institutional coordination and propose concrete solutions to strengthen coordination among key actors, including ministries, civil society organizations, international agencies, and local communities. Central to this analysis is the need to develop an integrated child protection system that enhances data sharing, improves case management, reduces redundancy, and ensures a consistent, rights-based approach to protect and assist non-Egyptian UASC in Egypt.

B. Causes of the Problem

1- Legal Causes

Egypt's legal framework for child protection, including the *Child Law No. 126 of 2008* (Egypt, Child Law, 1996/2008) and *Asylum Law No. 164 of 2024*, establishes general safeguards for minors. However, these laws do not explicitly address the distinct vulnerabilities of UASC. While existing provisions aim to protect children broadly, they lack targeted mechanisms to resolve issues of UASC, such as access to specialized services and long-term care solutions (PPH Roundtable Discussion, 2025). This legal ambiguity leads to inconsistent implementation of protections, resulting in gaps in essential services, legal uncertainty, and challenges in guardianship frameworks for UASC. It is important to note that Law No. 82 of 2016 on Combating Illegal Migration and Smuggling of Migrants explicitly mandates that the state, through NCCM, assume legal guardianship of unaccompanied children whose families or legal representatives cannot be identified. However, in practice, operational challenges and coordination hurdles, as mentioned in the PPH Roundtable Discussion (2025), can limit the effective realization of these protections, leaving some UASC exposed to vulnerabilities.

The Egyptian law emphasizes the protection of all children within its jurisdiction, irrespective of their legal status. Besides, the principle of non-discrimination is upheld by the Egyptian constitution, Article 9, and reinforced by Law No. 12 of 1996 (the Child Law, as amended by Law No. 126 of 2008 and subsequent amendments), as well as Law No. 64 of 2010 on Combating Human Trafficking and Law No. 82 of 2016 on Combating Illegal Migration and Smuggling of Migrants. These laws, together with NCCM Standard Operating Procedures for the Protection and Assistance of Child-Asylum Seekers, Refugees, and Victims of Migrant Smuggling and Trafficking in Persons, provide a legal framework for the care and protection of migrant UASC. However, despite these legal frameworks and protocols, practical challenges persist. Migrant UASC, especially the undocumented, may still face barriers in accessing healthcare, education, and legal representation due to gaps in implementation and the absence of detailed, child-specific operational guidelines targeting the unaccompanied or separated. This can exacerbate their marginalization and limit their ability to secure stable futures, underscoring the need for continued efforts to strengthen coordination and ensure effective application of existing laws and SOPs.

Additionally, multiple entities, including government agencies such as the Ministry of Social Solidarity and the Ministry of Youth and Sports, the National Council for Childhood and Motherhood, Child Protection Committees, and international organizations, are tasked with safeguarding children. However, while NCCM is explicitly mandated as the legal guardian of UASC and serves as the coordinating authority for child protection in Egypt, the involvement of numerous actors can sometimes lead to overlapping responsibilities and coordination challenges in practice. This underscores the importance of continued efforts to streamline inter-agency collaboration and ensure the effective implementation of child protection protocols. As discussed during the PPH Roundtable Discussion (2025), which included various governmental entities, international organizations, civil society, and academia, it was raised that some of the governmental committees and entities face significant understaffing challenges. As a result, the employees responsible for the child protection unit are often assigned additional administrative duties, which hinder their ability to perform their core responsibilities in child protection fully.

This limitation in staffing can strain the capacity of relevant agencies, potentially leading to delays in critical interventions and making it more challenging to ensure consistent follow-up and coordination in child protection cases.

2- Administrative Causes

Government agencies responsible for handling UASC cases in Egypt face significant challenges in managing the complex legal and social needs of these children. For example, officials often encounter bureaucratic barriers and lengthy administrative procedures when processing residency permits or family reunification, resulting in delays and obstacles to accessing essential documentation and services for UASC (European Commission, 2022; [Human Rights Watch, 2024](#); Regional Refugee and Resilience Plan [3RP], 2024). Additionally, while collaboration and coordination between key entities, including governmental entities and international NGOs, have historically faced challenges, recent efforts reflect meaningful progress. For example, [in February 2025](#), IOM organized a roundtable with government counterparts specifically aimed at enhancing coordination among UN agencies, NGOs, and governmental bodies. Furthermore, mechanisms such as the Taskforce for Children on the Move, which brings together IOM, UNICEF, UNHCR, NCCM, MoSS, and NCCPIM&TiP, facilitate information-sharing and joint decision-making.

Nevertheless, the involvement of multiple actors and the evolving nature of these coordination platforms mean that fully unified and streamlined approaches to UASC case management are still a work in progress. As collaboration continues to deepen, time and sustained effort are required to overcome existing operational barriers and ensure consistently coherent support for UASC (UNICEF, 2021; 2022; 2023). Moreover, insufficient funding for legal aid, child protection services, and care facilities further strains administrative systems. Budget shortfalls limit the availability of shelters, mental health support, and educational programs tailored to UASC, with recent funding cuts threatening the continuity of these essential services and leaving many children without adequate care or protection (UNHCR, 2025a; The New Arab, 2025).

3- Service Provision Challenges

Observations from the PPH Roundtable Discussion (2025) suggest that, while Egypt's national frameworks guarantee access to core services for UASC, practical implementation can be inconsistent, particularly for those without legal documentation, due to systemic and structural challenges. These challenges include bureaucratic and legal barriers (such as lengthy residency and documentation processes), financial constraints, limited access to core services, as well as social and cultural barriers. These insights are based on direct feedback from practitioners engaged in child protection in Egypt, representing several NGOs and RLOs, some of whose members are actual refugees in Egypt.

First, access to public services is closely tied to legal residency status. Children who lack a valid residency permit, whether due to delays in registration, arrival through irregular channels, lack of information about registration procedures, or other administrative and financial barriers, are unable to enroll in public schools, receive healthcare, or benefit from protection interventions. These administrative barriers result in a bifurcated system, where registered UASC have access to essential services, while unregistered non-Egyptian children are effectively left without support for extended periods, sometimes years (UNHCR, 2025).

Second, even access to NGO- and INGO-delivered services is often contingent on UNHCR registration. Humanitarian assistance—including education grants, medical aid, and psychosocial support—is frequently routed through UNHCR’s implementing partners, which require a UNHCR file number to initiate casework. Although multiple NGOs and agencies provide services to unregistered UASC, the predominance of UNHCR as the recognized gateway means that unregistered children may struggle to access support simply due to a lack of awareness or information about alternative providers. This underscores the need for broader outreach, information dissemination, and coordination to ensure all UASC (regardless of registration status with UNHCR) can access the protection and assistance they need.

Third, while Egypt has established national Standard Operating Procedures on children on the move and adopted a national strategy on human trafficking, there remain gaps in the implementation of a state-run referral system and alternative care infrastructure specifically dedicated to UASC. As a result, many migrant UASC may still find themselves in unsafe or informal housing arrangements due to limited access to specialized alternative care options and case management frameworks tailored to their unique needs. The limited number of shelters that do exist often lack adolescent-sensitive facilities and are unevenly distributed across governorates, leading to geographic disparities in access. Case management systems for migrant UASC in Egypt continue to face notable challenges. While significant efforts have been made by international organizations such as UNICEF and IOM, which delivered extensive training and capacity-building programs for government frontline workers on trauma-informed care and child protection in migration contexts, gaps remain in practice. During the PPH Roundtable Discussion (2025), discussions and stakeholder feedback indicate that child protection units in the National Council for Childhood and Motherhood, especially outside Cairo, frequently lack adequately qualified staff and have limited access to specialized training. Continued and expanded outreach is essential to achieve consistent, satisfactory levels of case management and service delivery nationwide.

4. Financial Causes

Financial sustainability is a critical component in ensuring Egypt's ability to protect UASC. In recent years, the country has experienced significant macro-economic challenges, including inflation, a high influx of displaced Sudanese, currency devaluation, and rising public service demands. These pressures have placed strain on national budgets and limited the ability to expand or sustain child protection services at scale ([International Monetary Fund \[IMF\]; World Bank, 2023](#)). While Egypt continues to demonstrate a strong commitment to supporting vulnerable populations, the increasing costs of hosting migrant and refugee communities have further burdened the social protection system.

Specialized services for UASC—including alternative care, psychosocial support, legal aid, and safe shelter—require not only technical capacity but also long-term financial investment. However, the absence of a dedicated national budget line for UASC programming has resulted in an overreliance on international donors and humanitarian agencies. These actors, while essential, often operate within project-based frameworks and are subject to unpredictable funding cycles ([UNICEF, 2023](#)). Recent cuts in donor contributions under the Regional Refugee and Resilience Plan (3RP) have led to reductions in education grants, case management support, and mental health services, leaving many UASC without adequate protection (SOS Children's Villages International, 2021).

This reliance on external funding underscores the need to strengthen national financial sustainability mechanisms. The lack of co-financing agreements or structured public-private partnerships means that many critical services operate in isolation from Egypt's broader social policy framework. Without integrated and stable financing, services risk becoming fragmented, inconsistent, and unable to respond to the evolving needs of UASC, particularly in underserved or high-risk areas.

C. Consequences of the Problem

Despite the government's efforts, the protection system for UASC faces a lot of challenges. It requires further substantiation to provide a comprehensive understanding of the current protection landscape. Implementation gaps persist in legal frameworks, service provision, and institutional coordination ([UNICEF, 2022](#)). These persistent problems create protection risks that extend beyond humanitarian concerns, affecting Egypt's social stability by disrupting or threatening the peaceful functioning and cohesion of the Egyptian society.

As documented by [UNICEF \(2023\)](#), this systemic breakdown affects all dimensions of children's well-being, ranging from legal identity and physical safety to psychosocial development and future opportunities.

Legal and Protection Consequences: UASC without legal residency status are afraid to face a heightened risk of arrest and refoulement due to their irregular status (undocumented immigrants). The lack of a formal active and well implemented state-led asylum system or expedited procedures for minors perpetuates their legal limbo despite the government's effort to get the new asylum law's executive regulation in action by finalizing drafting it. We will still be waiting for the Executive Application to have a clear roadmap and a full image on who will do what and when, yet we do not have this final image on responsibility distribution, which exposes UASC to rights violations and prevents access to guardianship, legal representation, or safe shelter. In the absence of effective and implemented national protocols for the identification and registration of UASC, these children may also be at risk of statelessness, particularly those born in transit or to undocumented parents ([Ayoub, 2021](#)). Furthermore, the lack of oversight and case management (PPH Roundtable Discussion, 2025) exposes UASC to serious protection risks such as exploitation, trafficking, and forced labor ([U.S. Department of Labor, 2023](#)). Smugglers and traffickers often take advantage of children on the move, particularly UASC, and with the children's desperation, this can lead to frequent cases of abuse, coercion, and sexual violence, especially among adolescent girls and children traveling alone. Without a clear legal status, children struggle to assert any rights or seek protection when threatened, placing them in a constant state of legal and existential precarity ([UNICEF Egypt, 2023](#)).

The implications for Egypt are substantial. Despite the existence of Child Law No. 12 (1996), amended by Law No. 126 (2008), persistent gaps in implementation, oversight, and coordination continue to strain Egypt's child protection system. These deficiencies have drawn criticism in recent UN human rights reviews, including Egypt's 2023 Universal Periodic Review ([EIPR, 2023](#)). While Egypt has launched initiatives such as the National Strategy for Human Rights (2021–2026) and expanded the role of the NCCM, challenges remain in age assessment, guardianship, and case management for vulnerable children, especially UASC.

Egypt can draw valuable lessons from regional and international models. Morocco's Immigration Law No. 02-03 (2003) and subsequent reforms introduced specialized juvenile protection units and improved age assessment protocols ([Moroccan Government, 2016](#)). Tunisia's Child Protection Code (Law No. 95-92) established child protection delegates in each governorate and emphasized mediation and community-based care ([OMCT, 2020](#)). The UK's child protection framework emphasizes multi-agency coordination, mandatory reporting, and safeguarding protocols across education, health, and justice sectors ([HM Government, 2023](#)). Germany's "Agents of Change" action plan integrates psycho-

social support, refugee child protection, and school-based safeguarding, offering a holistic model that Egypt could adapt ([Deutschland.de, 2023](#)).

While each model has its limitations, Egypt can selectively adopt best practices, such as Tunisia's decentralized protection delegates, Morocco's legal safeguards for migrant children, and the UK and Germany's emphasis on interagency coordination and trauma-informed care, while tailoring them to its own legal, cultural, and institutional context.

Psychosocial and Developmental Impacts: From a theoretical perspective, prolonged exclusion from education, healthcare, and psychosocial support compounds the trauma of displacement and separation. Many UASC suffer from anxiety, depression, or behavioral disorders stemming from the stress of survival, exploitation, or violence. Usually, the absence of structured, child-sensitive environments leaves children without safe spaces to recover, socialize, or develop cognitively. Despite the availability of educational opportunities, the psychosocial factors among many others of UASC affect their educational continuity and deny children the opportunity to build stable routines or plan for the future, fostering feelings of hopelessness and dependency. In response to prolonged instability and lack of psychosocial care, some UASC adopt harmful coping strategies such as substance abuse or affiliating with informal gangs as a means of protection and economic survival. These mechanisms, while offering short-term relief, often expose children to further cycles of exploitation and criminalization. Girls, in particular, may face pressure to enter early marriages as a perceived means of stability or protection, further entrenching cycles of disempowerment and exclusion ([UNICEF, 2020](#)).

Despite the accommodating policies of GoE and the continuing efforts such as those offered by the NCCM to integrate refugees, still there are implications on Egypt's society because of the increasing UASC's psychosocial needs that can sometimes make it difficult to offer the needed support. Children are more likely to require costly mental health services, remain trapped in cycles of poverty, and potentially become vulnerable to radicalization. This not only represents a humanitarian failure but also a missed opportunity to integrate potentially productive members into Egyptian society. The economic consequences of neglect become particularly apparent when examining UASC's exclusion from formal labor markets ([UNICEF, 2018](#)).

Economic and Social Marginalization: Children lacking legal documentation or UNHCR registration might face difficulties in the formal sector to receive aid, but the informal sector supports their social protection mechanisms. Organizations like St. Andrew's Refugee Services (StARS) provide critical assistance through programs such as the *Unaccompanied Youth Bridging Program (UYBP)*,

which offers education and vocational training, and the *Direct Assistance* Program, which distributes food, hygiene kits, and clothing. StARS also connects youth to legal aid and psychosocial support, helping them navigate systemic barriers (StARS, 2025).

In general, different formal and informal actors in Egypt offer a wide range of services to help UASC overcome the economic difficulties and avoid child labor risks. In this regard, an inspiring initiative from Jordan was the ILO’s “Moving Towards a Child Labor Free Jordan” project (2011–2016). It strengthened Jordan’s efforts to eliminate child labor through policy reforms, improved monitoring systems, and vocational training programs. Besides, it established a national child labor database, trained officials, and conducted Jordan’s first National Child Labor Survey (2016), which included Syrian refugees. The project also facilitated youth apprenticeships to transition children from work to education (ILO, 2016).

Systemic and Institutional Consequences: Egypt’s institutional framework for UASC protection combines state-led mechanisms with humanitarian partnerships; however, gaps persist. The NCCM and the NCCPIM&TIP anchor child protection efforts, a lot of coordinated efforts, including the Standard Operating Procedures (SOPs) developed with IOM to standardize identification, referral, and case management for UASC (IOM, 2022). This improves their opportunity of access to health, education, and legal aid regardless of nationality. However, implementation challenges persist due to limited capacity that might hinder uniform service delivery due to limited local government capacity and the need for extra funding to meet the increasing numbers of refugees, as seen in the 2025 Refugee and Resilience Response Plan (ERRRP), which seeks \$339 million to address gaps in services for 1.8 million refugees and host communities (UNDP, 2025). The implications of the above-mentioned institutional challenges emphasize the need for further coordination of institutional efforts among different formal and informal actors. Without systemic institutional arrangements, evidence-based policymaking will remain difficult, and partnerships with international donors will be complicated.

D. Significance of the Problem

The current system gaps that affect the protection of UASC pose administrative, humanitarian, social, and economic challenges to the GoE that could undermine its continuous efforts to integrate refugees into its social fabric. Strengthening child protection measures and enhancing the institutional coordination would enhance Egypt’s diplomatic leverage and access to international funding, improve cooperation with the European Union and African Union on migration governance, and ensure social cohesion and national security, positioning Egypt as a regional leader in responsible migration management.

II. Review of Current Policies

Egypt is a party to several international agreements that legally bind it to protect refugees, migrants, and asylum seekers, including UASC. Notably, Egypt ratified the Convention on the Rights of the Child (CRC) ([United Nations, 1989](#)), which under Article 22 mandates states to provide refugee children with access to protection, education, and healthcare. Similarly, Egypt acceded to the African Charter on the Rights and Welfare of the Child (ACRWC) ([African Union, 1990](#)), which, in Article 23, explicitly requires signatories to safeguard UASC from trafficking, violence, and exploitation. Additionally, Egypt has not ratified the *1954 Statelessness Convention* ([United Nations, 1954](#)) or the *1961 Convention on the Reduction of Statelessness*, exacerbating risks of statelessness for UASC born to undocumented parents ([United Nations, 1961](#)). National *Child Law No. 126 of 2008* designates the NCCM as the lead authority for child protection, aligning with CRC principles (NCCM, 2016). The *Asylum Law No. 164 of 2024*, Egypt's first dedicated asylum legislation, introduces a critical provision in Article 7, which establishes a "fast-track" procedure to prioritize asylum claims for vulnerable groups, including UASC.

Recent policy developments in Egypt reflect a growing and commendable national commitment to safeguarding UASC and other vulnerable refugee populations. In 2020, the NCCM introduced Standard Operating Procedures (SOPs) that marked a significant step forward in child protection (NCCM, 2020). These SOPs offer a clear and structured framework for case management and service delivery, rooted in both national legislation and international child rights standards. By enhancing coordination among government ministries, national committees, international organizations, and civil society actors, Egypt has created a more inclusive and protective environment for children "on the move," ensuring their access to essential services and safeguarding them from violence, abuse, and exploitation (APS, 2025).

Egypt's commitment was further reinforced with the enactment of a new national asylum law in November 2024. This progressive legislation established a permanent Committee for Refugee Affairs and prioritized the processing of asylum applications for vulnerable groups, including UASC. The *Asylum Law No. 164 of 2024*, Egypt's first dedicated asylum legislation, introduces a critical provision in Article 7, which establishes a "fast-track" procedure to prioritize asylum claims for vulnerable groups, including UASC. Importantly, the law removes financial barriers by exempting refugees from fees for health care, education, and legal services—ensuring equitable access to support. Additional measures, such as extending residence permits to one year (UNHCR, 2025), promote greater stability and integration. The launch of the Egypt Refugee and Resilience Response Plan (ERRRP) in June 2025 underscores Egypt's strategic leadership in refugee protection, demonstrating a forward-looking approach to resilience, inclusion, and comprehensive coordination

across host communities and humanitarian partners (UNHCR, ERRRP, 2025).

Egypt's current policies reflect a coordinated, rights-based approach to UASC protection, emphasizing structured procedures, legal reforms, administrative facilitation, and multi-stakeholder collaboration to ensure the safety, rights, and well-being of vulnerable children.

Egypt's policy framework for UASC integrates international partnerships and domestic programs; nonetheless, implementation gaps persist. The NCCM operates the *Aman* Initiative, which means safety, offering temporary shelters and psychosocial support for UASC; however, services are concentrated in urban centers like Cairo and Alexandria and not in rural regions (National Council for Childhood and Motherhood, 2019). In collaboration with UNICEF, UNHCR manages the PROSPECTS Program (2020–2025), funded by the Netherlands, which has provided education grants, healthcare referrals, and vocational training to 3,200 UASC as of 2023 (UNICEF, 2024). IOM also provides services to UASC through different means (capacity building, medical assistance, MHPSS, case management, and social cohesion efforts). Despite the Ministry of Education's Refugee Student Integration Program (2018), only 42% of eligible UASC attend school due to Arabic-language requirements and transportation barriers (Save the Children, 2023). Non-formal education initiatives by NGOs like Terre des Hommes mitigate these gaps through multilingual curricula. Healthcare access remains uneven: registered UASC benefit from the *National Health Insurance Reform* (2021), while unregistered children rely on IOM, NGO clinics, such as Caritas Egypt, which serves 1,500 UASC annually via EU funding (Caritas, 2023). Anti-trafficking efforts are led by the National Coordinating Committee on Combating Human Trafficking (NCCHT) and IOM (PPH Roundtable Discussion, 2025). Budgetary limitations further constrain progress: only 5% of the Ministry of Social Solidarity's 2023–2024 child protection budget (EGP 12 billion/\$388 million) targets UASC-specific services, with over 80% of programs dependent on foreign donors.

Stakeholder coordination challenges exacerbate systemic barriers, especially between the unofficial migrants' communities and the ministerial representatives (PPH Roundtable Discussion, 2025). The NCCM oversees shelters, but it lacks a dedicated UASC budget line, while the MOI's residency permit delays hinder access to education and healthcare (UNHCR, 2024). Donors tend to prioritize short-term projects, such as the EU's €87 million migration management fund, rather than more long-term sustainable solutions (European Commission, 2024).

Egypt's government has made commendable strides in protecting UASC through legislative reforms, strategic partnerships, and targeted programs. While challenges remain, the country's proactive measures and international collaborations underscore its dedication to upholding the rights and dignity of vulnerable children.

III. Policy Alternatives and Analysis

1. Strengthening and Institutionalizing the Implementation of the National Guardianship System for UASC

This policy alternative proposes the establishment of a formal, operational, and well-resourced national guardianship system for UASC in Egypt, building upon the existing legal framework and enhancing governance, coordination, and service delivery mechanisms. Under current legislation, the NCCM is designated as the legal guardian for all unaccompanied children on Egyptian territory, including non-nationals. The absence of an institutionalized system limits the practical realization of this mandate. To address this gap, the policy calls for embedding guardianship functions within dedicated UASC units across NCCM, relevant ministries (such as the Ministry of Social Solidarity and the Ministry of Health), and key partner organizations, including UNICEF, UNHCR, and select NGOs. These units would coordinate case management, standardize data collection, and improve accountability, operating within the broader framework of the National Task Force on Children on the Move.

The activation and strengthening of Child Protection Committees (CPCs) at district and governorate levels are central to this approach, as is capacity building for the child protection workforce, including social workers and helpline staff. While NCCM's legal guardianship role is established in law, operationalizing a comprehensive guardianship system that provides individualized advocacy, monitors guardians' performance, and prevents exploitation requires further legal reform, increased financial investment, and ongoing capacity building.

NCCM is mandated to oversee planning, coordinating, monitoring, and evaluation of all child well-being dimensions, and it chairs the national task force on children on the move. Recent efforts have focused on developing and rolling out national Standard Operating Procedures (SOPs) for child protection case management, with special provisions for migrant, refugee, and trafficked children launched by NCCM in 2020 (NCCM, 2020). These SOPs, supported by IOM, UNICEF, UNHCR, and other partners, aim to ensure that UASC have access to legal representation, social protection, and essential services, including education, healthcare, and psychosocial support, through coordinated case management and referral pathways (IOM, 2022).

Additionally, the policy advocates for clear procedural guidance to regulate guardian responsibilities, monitor performance, and safeguard against exploitation or neglect. Strengthening NCCM's leadership role and improving inter-agency collaboration are critical to aligning national practices with international standards. Financial sustainability should be secured through pooled donor

mechanisms and by integrating UASC protection within broader national child protection and migration strategies. If fully implemented, this policy would reinforce Egypt's legal obligations, improve cross-sectoral coordination, and ensure comprehensive and durable protection for all UASC residing in the country.

2. Expanding the National Family-Based Alternative Care System to Include Refugee and Migrant UASC

As of January 2025, Egypt's *kafala* system included 12,323 Egyptian children living in alternative care situations. Additionally, the number of foster families recorded reached 12,094, according to official data from the Ministry of Social Solidarity. These figures reflect the government's ongoing efforts to expand family-based care as an alternative to institutional placement ([Egypt Today, 2025](#)). Therefore, Egypt should consider adopting a national policy framework that recognizes and enables the formal placement of unaccompanied and separated refugee and migrant children into community and family-based alternative care systems. Drawing from promising practices in the MENA region ([UNICEF & IDC, 2022](#)), this policy option would move beyond institutional placements toward a structured system rooted in local norms, particularly foster care and *kafala* (Islamic guardianship). While Egypt already mandates the NCCM and Child Protection Committees at the governorate and district levels to respond to children without parental care, the system remains poorly adapted to the legal and protection needs of non-Egyptian children; *Kafala* and foster care systems in Egypt are primarily designed for Egyptian nationals, which creates significant barriers for non-Egyptian children in accessing these care options. Legal and regulatory requirements stipulate that foster or *kafala* families must be Egyptian, and the system does not formally monitor or support alternative care for non-Egyptian children ([Maxwell, 2004](#)). Integrating refugee children into existing national care mechanisms requires legal reforms, such as the new alternative care law that shifts from institutional care to family-based care for children without parental care. The draft law will strengthen the legal framework for *kafala*, expand eligibility, and promote deinstitutionalization by prioritizing family placements over orphanages. This reform is part of Egypt's national strategy to ensure every child has the opportunity to grow up in a safe, nurturing family environment and aligns with international best practices ([Elbawab, 2024](#)).

Operationally, this care model should be built around the assets Egypt already has: strong religiously grounded acceptance of guardianship through *kafala*, informal hosting practices in refugee-dense communities, and a growing ecosystem of community-based organizations. Drawing from Tunisia's pilot to place refugee children in *kafala* arrangements under judicial oversight and Jordan's kinship-care recognition for Syrian children ([UNICEF & IDC, 2022](#)), Egypt could establish a dual-track system where both Egyptian families and vetted refugee

caregivers are eligible to host children. These arrangements should be legally recognized, monitored, and supported through standardized training, financial or in-kind assistance, and access to psychosocial and legal support services. Organizations like *Yalla Kafala* and Save the Children have developed technical expertise in supporting caregivers and could be mobilized alongside refugee community groups to identify and prepare safe households. Embedding these partnerships into national SOPs—co-developed by NCCM and the Ministry of Social Solidarity, with inputs from UN and civil society—will create a coordinated ecosystem where care placements are documented, reviewed, and centered on the child’s best interests. Over time, these systems can be scaled nationally through pilot programs in governorates with high refugee and migrant populations, such as Cairo, Giza, Alexandria, and Aswan.

Nonetheless, implementation must confront predictable structural and social barriers: limited funding, staff shortages in local child protection units, legal ambiguity around refugee and migrant children’s status, and public hesitation to care for non-national children. To mitigate these risks, Egypt can begin with phased implementation, including legal review of guardianship provisions under the *Child Law, Law 2016 art. 3*, and *Personal Status Law*; budgeted pilot programs under the Social Solidarity and Education ministries, and joint capacity building for social workers and family court officials. RLOs, CBOs, and religious leaders should be systematically engaged to reduce stigma and build social acceptance, particularly around caring for older children, girls, and children from African backgrounds. With targeted international support and integration into broader child protection reform, Egypt can evolve toward a coherent, culturally resonant, and legally protective care model, one that ensures every child on its territory, regardless of origin, can grow up in a safe, nurturing family environment.

3. Developing a Child-Friendly Asylum-Seeking Procedure for UASC within the Framework of the New Asylum Law

Egypt’s newly enacted 2024 National Asylum Law and its forthcoming 2025 Executive Regulation present a critical opportunity to establish a robust and child-sensitive legal pathway for migrant and asylum-seeking UASC. At the same time, the continued delegation of RSD to UNHCR offers a crucial transitional mechanism, but there remains an absence of clearly defined legal clauses that underline the special needs and vulnerabilities of UASC within the new law. This ambiguity could potentially impact UASC, which may not have legal representation or fully understand complex asylum procedures and, consequently, expose these vulnerable children to heightened risks of marginalization, exploitation, and procedural uncertainty. Moreover, the law’s requirement for asylum seekers to submit applications within 45 days of arrival, with penalties for non-compliance, is a significant concern for UASC.

Children who arrive irregularly (potentially as survivors of trafficking) may be particularly vulnerable and unaware of such deadlines, potentially leading to criminalization or denial of protection. Moreover, the process doesn't ensure interpretation services for non-Arabic speakers ([Amnesty International, 2024](#)). And while the law recognizes UASC as one of the categories of vulnerable asylum seekers who would be eligible for fast-tracking, the specific procedures for age assessment and how they align with international best practices (e.g., presumption of minority, avoiding punitive measures) are crucial but not fully elaborated in the publicly available summaries of the law itself ([Amnesty International, 2024](#)). Historical issues with age assessment in Egypt have been noted, where children were sometimes incorrectly processed as adults, denying them access to specific child protection services and resettlement opportunities ([Folache & Ritchie, 2020](#)). Lastly, the law outlines a clear distinction between the rights provided to refugees as opposed to asylum seekers; it provides no provisions for the rights of asylum seekers during this period (which lasts up to one year), including access to adequate reception, shelter, healthcare, housing, education, or work.

Accordingly, this recommendation advocates for the introduction of bylaws that outline child-friendly and sensitive procedures that take into consideration the special vulnerabilities and needs of UASC. The starting point would be legal and physical safety (until a decision is made by the PCRA) through a special protection residence permit that would grant UASC temporary legal status and guarantee access to essential services, including education, healthcare, and psychosocial support, thereby mitigating risks of statelessness and child labor or exploitation. Additionally, integrating child rights principles into the asylum framework further entails embedding UNHCR's Best Interests Procedures (BIA and BID) directly into the new state-led asylum system, with special attention given to their psychological and developmental stage. Crucially, every UASC must be appointed a trained guardian and legal representative to ensure their best interests guide all administrative and legal decisions. This is in addition to providing interpretation for children who are non-Arabic speakers. In terms of age assessments, multidisciplinary and non-invasive age assessment methods are preferred, with a presumption of minority in cases of doubt. Drawing on the UK's commendable, albeit imperfectly implemented, age assessment framework, Egypt should prioritize establishing clear, publicly available guidelines for age assessments within the bylaws of the new asylum law. Emulating the UK, Egypt's framework should uphold the "benefit of the doubt" principle, treating individuals as children unless their physical appearance and demeanor *strongly suggest* they are significantly older (e.g., 25+ years). To ensure accuracy and child-rights adherence, all assessments should be conducted as a last resort, be entirely standalone interviews, and allow for the presence of an independent, appropriate adult, such as a legal representative. Crucially, Egypt must also implement accessible and transparent complaint

mechanisms and appeal reviews, providing children with written reasons for decisions and upholding their right to be heard and participate in processes affecting them, thereby preventing increased vulnerability and ensuring fairness during their asylum proceedings (Forced Migration Review, Issue 65, November 2020).

Moreover, to ensure child-friendly procedures, it is essential to provide comprehensive training for all personnel interacting with asylum-seeking UASC (e.g., border officials, registration staff, interviewers, legal aid providers, and child protection actors). This training should cover child development, trauma-informed care, child-specific forms of persecution (e.g., child labor, child marriage, trafficking), and the importance of an ethic of care and empathy. This is in addition to establishing clear protocols and referral pathways (aligned with the already developed national SOPs) to specialized child protection services, including for children at heightened risk, victims of violence, abuse, or exploitation ([UNHCR Technical Guidance, 2021](#)).

Technically, Egypt possesses the foundational elements to embed these procedures. The UNHCR Technical Guidance on Child-Friendly Procedures provides a clear roadmap, emphasizing key components such as specialized training for frontline workers on child development and trauma-informed care, the implementation of BIP, the appointment of trained guardians and legal representatives, and the establishment of clear referral pathways to specialized child protection services through the NCCM-led national SOPs and child protection services. Additionally, the government can piggyback on the already made some advancements in establishing a child-friendly justice system, building on the “best interests of the child” principle and focusing on tailored approaches for children. These advancements include the establishment of specialized Child Courts, public prosecution, and care institutions, which handle child cases with tailored approaches, often supported by social workers, and offer child-friendly interview and waiting rooms. Furthermore, children are granted the right to free, high-quality, state-funded legal aid that is accessible, age-appropriate, multidisciplinary, effective, and responsive to their specific legal and social needs, with referrals to NGOs or Child Helpline lawyers when needed. The system also emphasizes psychosocial support through trained professionals, with recommendations to increase the number of psychological experts and provide additional training for staff on child-friendly communication and specific child-related issues. Child participation and empowerment are fostered by raising children’s awareness (as rights-holders) and developing protocols for seeking their views in proceedings. Finally, procedural adaptations like allowing audio and video statements and ensuring children can be accompanied by a trusted support person are implemented to minimize negative impacts during legal proceedings ([OECD, 2023](#)).

Economically, the substantial financial commitments made by international part-

ners to Egypt offer a clear opportunity to bolster the nation's new asylum framework. Specifically, the European Union's €7.4 billion strategic partnership with Egypt (2024-2027), which includes €200 million directly earmarked for migration management, and the European Union's significant contribution as a top donor to UNHCR's global operations (whose 2024 budget stands at over \$10 billion), highlight a robust resource base ([EU Official Website, March 2024](#)). By strategically reallocating a portion of these existing funds, Egypt can enhance the implementation of its new asylum law, embedding comprehensive child-friendly asylum procedures. This targeted investment would not only align with the EU's migration management objectives by fostering more orderly and humane processes but also leverage existing international aid to yield significant long-term economic benefits for Egypt. Such benefits include reduced administrative inefficiencies, decreased social welfare burdens associated with undocumented populations, and a future economic contribution from integrated individuals, thereby transforming these expenditures into a fiscally responsible investment in human capital and a stronger, more stable society.

Last but not least, institutionalizing a dedicated legal pathway within the new asylum system would formally recognize and protect UASC, aligning with Egypt's constitutional obligations under Article 93 ([Constitution of the Arab Republic of Egypt, 18 January 2014](#)) and its commitments under the Convention on the Rights of the Child (CRC).

4. An Integrated, AI-Enhanced National Coordination Platform

This alternative suggests an enhancement tool that can add to the existing coordination activities of both government and international organizations engaged in UASC services. This policy proposes a transformative, integrated National UASC Coordination Platform, leveraging both established coordination models and advanced AI technologies, to streamline service provision, optimize resource allocation, and enhance protection mechanisms for UASC in Egypt.

The core components of the Integrated Platform include the following:

A- Institutional Structure and Centralized Coordination: Establishing a multi-stakeholder governing committee chaired by the Ministry of Social Solidarity, incorporating technical working groups for case management (led by the NCCM), health services (Ministry of Health and Population), security coordination (MoI), and community engagement (co-led by UN and Refugee-Led Organizations - RLO networks). The Committee can then assign task forces to create both national coordination mechanisms to foster stronger partnerships between government and nongovernmental entities, and an accountability mechanism to monitor child protection standards inspired by Germany's centralized coordination system ([BAMF, 2018, 2023](#)).

The coordination arrangement will also ensure a Community Engagement

Framework through formalizing partnerships with RLOs and CBOs, ensuring culturally appropriate service delivery while maintaining necessary oversight. This inclusion can be supportive in addressing cultural barriers and enhancing monitoring capabilities, as validated by recent successful applications in comparable contexts such as Greece, Tunisia, and Germany ([UNDP, 2022](#)).

For instance, in Greece, collaborations between humanitarian actors and refugee community groups have been vital for localized service provision and integration efforts ([UNHCR, 2021](#)). Similarly, Tunisia has seen increased recognition and engagement with civil society organizations, including those led by migrants and refugees, to address immediate needs and promote social cohesion ([UNHCR, 2022](#)). Similarly, Germany has also notably enhanced its data-driven approach to integration with the launch of the Integration Dashboard by the Federal Statistical Office (Destatis) in April 2025, an interactive online tool providing accessible insights into migration, integration, and participation ([European Commission, 2025](#)).

B- AI Driven Platform—Advanced Digitalized Infrastructure: The AI platform component proposes developing a centralized AI-powered platform to revolutionize UASC management in Egypt. This system will integrate biometric case management with real-time service tracking and duplicate detection, while leveraging blockchain for secure data sharing and machine learning for predictive analytics to identify at-risk children. The infrastructure will also feature user-friendly mobile interfaces and dashboards for stakeholders, ensuring robust data privacy and security through onshore data hosting in compliance with Egypt’s Data Protection Law, and mitigating algorithmic bias via regular ethical AI audits. The system will integrate advanced technologies like blockchain for secure and transparent data sharing, enabling clear audit trails for decisions and resource allocations, addressing areas of improvement in Egypt’s child protection sector.

The platform will ensure fair and efficient management and coordination and prioritize their needs. The platform will utilize machine learning for predictive analytics to identify at-risk children by detecting patterns like prolonged lack of guardianship, frequent school absenteeism, or health emergencies, enabling early intervention. Algorithmic bias will be prevented through regular audits using ethical AI frameworks. This builds on proven models of digitalization, like Tunisia’s Ahmini mobile application, which successfully integrated 500,000 rural women into the National Social Security Fund. Similarly, Morocco utilized an electronic platform to enable informal women workers to apply for financial compensation under its COVID-19 response plan (Gibson, Gazi, & Arner, 2024). Moreover, among the most recent proven models of digitalization is Abu Dhabi’s “TAMM 3.0 platform”. TAMM 3.0 is an AI-powered

government service portal that utilizes advanced algorithms to analyze user behavior and provide proactive support, effectively pre-empting challenges and enhancing seamless service delivery across various government interactions (DGE Abu Dhabi, 2024).

This comprehensive approach directly addresses Egypt's enhancement potential in its coordination mechanisms while establishing sustainable systems for UASC protection. By integrating centralized governance models with technological solutions and Egypt's unique community partnerships, the policy balances humanitarian obligations with national security priorities.

5. Formalizing Refugee-Led Organizations (RLOs) and Community-Based Organizations (CBOs) for UASC Support in Egypt

Formalizing and legalizing RLOs and CBOs in Egypt represents a strategic shift from informal, precarious operations to recognized, empowered partnerships. This approach acknowledges the unique strengths RLOs and CBOs bring to the protection landscape, particularly their deep understanding of community needs, cultural sensitivity, linguistic and geographical proximity, and direct lived experience of displacement. This is in addition to their ability to reach vulnerable populations, including UASC, that traditional aid actors often cannot, which gives them a massive edge as pivotal actors in protection and especially child protection. Legalization would unlock access to formal funding, training, and legitimate engagement with government and international bodies. While the new asylum law aims to nationalize the asylum process, it introduces potential restrictions, particularly concerning civil society engagement and the provision of "unofficial aid." Simultaneously, RLOs and CBOs often operate informally due to restrictive NGO laws (Law 149 of 2019), which pose significant barriers, such as stringent registration requirements, limitations on foreign funding, and particularly challenging "Egyptian nationality" clauses for board members that inherently exclude most genuine RLOs and CBOs. Such organizations are the first to be on the front lines, providing vital support to their communities, including UASC. Formalizing their status is crucial to enable them to operate transparently, access funding, and effectively contribute to protection efforts. These efforts would build on Egypt's strong tradition of community solidarity while promoting cost-effective, culturally grounded alternatives to institutional care.

The recent adoption of Egypt's 2024 Asylum Law and the work currently being done to finalize the executive regulations offer a timely and constructive platform to advance these reforms. Especially, the law, as it is, doesn't touch upon the RLOs and CBOs' essential role in the migration realm within Egypt. Clarifying these areas through legislative amendments or administrative guidance would provide both legal clarity and practical tools to support child-sensitive,

community-anchored care solutions. By integrating RLOs and CBOs into Egypt's broader child protection and asylum frameworks, these steps would strengthen coordination, reduce long-term public costs, and enhance protection outcomes in a culturally responsive and sustainable manner.

The policy solution looks towards simplifying registration procedures, potentially through a specialized unit within MoSS dedicated to refugee-related CSOs. This unit could provide clear guidelines, offer capacity-building support on legal compliance, governance, and financial management, and act as a liaison between RLOs/CBOs and other government entities, including the new PCRA. Leveraging technology for online registration, reporting, and information dissemination can further streamline these processes. The administrative shift also involves a mindset change within governmental bodies, moving from a purely regulatory approach to one that fosters partnership and recognizes the unique value proposition of community-led organizations. This would enhance data collection and referral pathways for UASC, ensuring they don't fall through the cracks of a complex system.

Moreover, formalizing CBOs and RLOs is essential for community-based alternative care initiatives for UASC, which are recognized as a promising practice in the MENA region, including Egypt. These informal arrangements, where families or individuals within refugees, migrants, or host communities voluntarily care for UASC, offer a family-based setting in line with UN guidelines on alternative care, which is often more beneficial for children than institutional living arrangements. RLOs and CBOs are key resources for identifying and supporting these children in need. They can help respond to the limited availability of formal alternative care places, provide stability and safety for children, facilitate their voices being heard, and help them recover from traumatic experiences. Their involvement can also ensure that these arrangements are integrated into the national child protection case management system, ensuring a continuum of protection and care until a durable solution is found. By formalizing these organizations, the state can strategically invest in and strengthen these vital community-based care arrangements, moving towards a continuum of protection and care in community settings as children's migration matters are resolved without overly stretching the national institutional care's capacities (UNICEF & IDC, 2022), especially at a time when MoSS is adopting the UN General Assembly guidelines on Alternative Care. This approach ultimately leads to the deinstitutionalization strategy that aims towards the progressive elimination of institutional cares and prompting family-based care approaches for children deprived of parental care (El Azzazy, 2023)

Furthermore, the legalization of RLOs and CBOs can enhance Egypt's attractiveness as a hub for international investment and partnerships in the humanitari-

an and development sectors. A transparent and well-regulated civil society landscape, where local organizations can operate openly and effectively, signals a commitment to the best international practices in aid delivery and human rights. This can encourage more international donors and development agencies to invest in Egypt, recognizing the robust local capacity for implementing programs. Moreover, by embracing a “whole-of-society approach” to migration governance, as highlighted in the Global Compact for Migration (GCM), Egypt can demonstrate its leadership in the MENA region by creating an environment where all stakeholders, including local communities, civil society, and the private sector, contribute to sustainable and dignified solutions for refugee populations ([UNICEF & IDC, 2022](#)). This, in turn, can positively influence Egypt’s international standing and foster greater collaboration on global development agendas. Additionally, such organizations often initiate income-generating activities, vocational training programs, and small-scale entrepreneurship support, which can create employment opportunities not only for refugees but also for members of host communities. By fostering economic independence, these initiatives reduce the long-term reliance on humanitarian aid and diminish the economic burden on the state. Furthermore, formalized organizations can leverage their legal status to engage in partnerships with the Egyptian private sector, opening avenues for job creation, skill transfer, and the integration of refugee labor into the wider economy, thereby transforming refugees from aid recipients into economic contributors (Al-Mahdi et al., 2024). Asylum Law and its 2025 executive regulation introduce important protections for asylum seekers and include references to vulnerable groups, including children, under Articles 7–9. To maximize its potential, the executive regulation could introduce mechanisms that enable accredited community actors to support child protection objectives in coordination with national institutions. By outlining clear roles for community engagement, establishing safeguards, and facilitating cooperation with humanitarian partners, the regulation could enhance referral systems, improve access to family- and community-based care, and contribute to the implementation of Egypt’s obligations under international child rights standards. Such an approach would strengthen national protection efforts in a practical, cost-conscious manner, while fostering greater trust and cohesion between refugee communities and public institutions.

IV. Conclusion and Recommendations

A- Policy Alternatives Evaluation and Policy Selection

The selection of key policy alternatives for further consideration was guided by a multi-criteria analysis, as detailed in the Policy Evaluation Matrix below. This evaluation assessed proposed options against five core criteria (**technological feasibility, financial feasibility, political feasibility, technical feasibility, and administrative feasibility**) established to address the complex protection

challenges faced by migrant and asylum-seeking UASC in Egypt. These criteria were informed by international best practices in child protection governance and policy design (UNICEF, 2022; UNHCR, 2023; World Bank, 2024).

For clarity and consistency, the following definitions were adopted in evaluating the alternatives:

- **Technological feasibility** refers to whether the tools, infrastructure, or innovations required to implement the policy are currently available or can be developed within a realistic timeframe (OECD, 2022).
- **Political feasibility** evaluates the likelihood of obtaining sufficient support from key political actors, stakeholders, and the public to adopt and sustain the policy (Save the Children, 2023; Human Rights Watch, 2024).
- **Financial feasibility** determines whether the required funding is available or can be mobilized without placing excessive pressure on national budgets or creating significant trade-offs (IMF, 2024; UNICEF, 2023).
- **Technical feasibility** examines whether the policy can be effectively designed and implemented using existing knowledge, expertise, and methodologies (UNHCR & UNICEF, 2023).
- **Administrative feasibility** considers whether existing institutions, personnel, and systems can manage, monitor, and enforce the policy effectively (Ministry of Social Solidarity, 2024; UNHCR, 2025).

| Criteria | Policy Option 1 | Policy Option 2 | Policy Option 3 | Policy Option 4 | Policy Option 5 |
|-----------------------------------|--|---|---|---|--|
| | Strengthening and Institutionalizing the Implementation of the National Guardianship System for UASC | Expanding the National Family-Based Alternative Care System to include Refugee and Migrant UASC | Developing Child-Friendly Asylum-Seeking Procedures for UASC within the Framework of the New Asylum Law | An Integrated, AI-Enhanced National Coordination Platform | Formalizing Refugee-Led Organizations (RLOs) for UASC Support in Egypt |
| Administrative Feasibility | 3 | 3 | 3 | 2 | 3 |
| Technological Feasibility | 3 | 4 | 4 | 3 | 3 |
| Financial Feasibility | 1 | 4 | 4 | 1 | 4 |
| Political Feasibility | 3 | 3 | 5 | 1 | 4 |
| Technical Feasibility | 3 | 4 | 3 | 1 | 3 |
| Total | 13/25 | 18/25 | 19/25 | 6/25 | 17/25 |

Each alternative is scored from 0 to 5, with zero meaning that the alternative is not feasible at all, and five meaning that it is highly feasible. To ensure an objective assessment for each alternative, we compared each feasibility dimension across all alternatives. For example, in investigating the administrative feasibility of all alternatives, we compare the existing administrative capacity and expected institutional responsibilities for each policy option to assign an appropriate score. This comparative approach was applied systematically across all five feasibility dimensions for each of the proposed policy alternatives.

0 - Not Feasible at All: This score indicates that the policy alternative is completely unworkable or impossible to implement under the given conditions for this specific feasibility dimension. There are insurmountable obstacles or a complete lack of necessary resources/support.

1 - Highly Unfeasible / Severe Challenges: This score suggests that while theoretically possible, the policy alternative faces extremely significant and likely prohibitive challenges within this feasibility dimension. Implementation would require overcoming major, fundamental barriers, or there are severe resource constraints/opposition.

2 - Moderately Unfeasible / Significant Challenges: This score denotes that the policy alternative faces considerable challenges within this dimension. While not impossible, it would require substantial effort, significant changes, or overcoming notable resistance/limitations to achieve feasibility.

3 - Moderately Feasible / Some Challenges: This score indicates that the policy alternative is generally feasible within this dimension, but it will encounter some identifiable challenges or require moderate adjustments. These challenges are manageable with reasonable effort and resources.

4 - Highly Feasible / Minor Challenges: This score signifies that the policy alternative is highly workable within this dimension, with only minor or easily surmountable challenges. The necessary conditions, resources, or support are largely in place, requiring minimal adjustments.

5 - Highly Feasible / Fully Supported: This score represents the highest degree of feasibility, indicating that the policy alternative is exceptionally well-suited and fully supported within this dimension. All necessary conditions, resources, and political will are in place, with no significant obstacles anticipated.

Strengthening and Institutionalizing the Implementation of the National Guardianship System for UASC:

This policy option seeks to enhance the guardianship framework under the leadership of the Government of Egypt, specifically through institutionalizing and scaling the National Guardianship System.

Administratively, the existing child protection structures demonstrate partial capacity to absorb expanded responsibilities (UNICEF, 2023). While some institutional frameworks are in place, operational bottlenecks and limited staffing remain major constraints, as discussed during the PPH Roundtable Discussion (2025). The system may be able to absorb small-scale or pilot interventions, but full institutionalization would require significant administrative restructuring and coordination (Samuel Hall & UNICEF, 2023).

The technological foundations for a guardianship system exist in a basic form, such as inter-agency referral systems. However, scaling these tools to a functional, nationwide system would demand substantial upgrades, interoperability mechanisms, and training. The required technology is broadly available but not

yet integrated on a scale (Samuel Hall & UNICEF, 2023).

As for the financial aspect, it is the most challenging aspect of the policy. Full institutionalization would involve costs related to recruitment, training, infrastructure, and ongoing service delivery. With limited fiscal space and competing social spending priorities, mobilizing sufficient domestic resources appears unlikely. The option would be heavily reliant on external funding, raising questions about long-term sustainability (Samuel Hall & UNICEF, 2023).

The political environment shows moderate support for child protection reform, particularly if framed within national development and rights-based agendas. However, expanding guardianship to non-citizen children may encounter resistance. Sustained political will and multi-stakeholder advocacy would be essential to advance this policy.

There is a solid technical foundation for guardianship protocols, supported by existing expertise and inter-agency efforts (UNICEF Egypt, IOM Egypt, 2024). However, gaps remain in specialized training, SOP standardization throughout different governmental agencies, and service delivery models. While technically viable in principle, implementation would require a concentrated capacity-building effort.

Expanding the National Family-Based Alternative Care System to Include Refugee and Migrant UASC:

This policy alternative appears to be the most feasible option among all proposed alternatives. From a technological standpoint, the management system for alternative care is not expected to be overly complex or sophisticated. Additionally, it would not require any new technology investment, as the Ministry of Social Solidarity already manages an alternative care system with established systems and procedures in place. The same applies to the technical and administrative feasibility of the proposed policy. The Ministry of Social Solidarity operates through a decentralized governance approach, with offices in all governorates that can facilitate the implementation. Since the formulation of the family-based alternative care system in Egypt, the Ministry has managed 12,323 cases ([Egypt Today, 2025](#)) in almost all of Egypt's governorates, indicating its ability to operate the system from both technical and administrative dimensions. Perhaps further training would be needed to equip the Ministry's staff with the necessary knowledge regarding the unique situation and needs of refugees. However, this appears to have limited financial implications, especially given the presence of several international organizations (such as UNICEF, UNHCR, and others) that might be willing to provide technical and financial support ([UNICEF, 2024](#)), as the policy contributes significantly to the welfare of refugee children, aligning perfectly with several international organizations' mandates and objectives. On the political level, even though we initially considered the

policy to be politically infeasible, we did so with reservations.

While the policy might face some resistance, we anticipate that this would have a limited effect for several reasons. First, despite some anti-refugee and anti-immigrant sentiments among certain Egyptian groups, there is not any institutionalized or organized anti-refugee movement that possesses sufficient political power to prevent such a policy from being materialized (National Center for Middle East Studies, 2024). Second, antagonizing stances towards refugees often emanate from blaming them for economic and social ills caused by their presence in large numbers over the past years, rather than a fundamental opposition to children's welfare. Third, family-based alternative care has religious roots and has been approved by Dar Al Ifta and Al Azhar, both of which have considerable moral influence on the majority of Egyptians (Egypt's Dar El-Iftah, 2005). Finally, the limited number of UASC represents a counterargument against potential voices that might push back due to fears of the proliferation of adopted non-Egyptians (fmreview.org, n.d).

Developing Child-Friendly Asylum-Seeking Procedures for UASC within the Framework of the New Asylum Law

This policy solution strategically leverages the ongoing governmental efforts to finalize the executive bylaws of Egypt's recently adopted Asylum Law. Its core objective is to ensure that these bylaws explicitly incorporate a child-friendly lens, recognizing and addressing the unique vulnerabilities of UASC throughout the asylum-seeking process.

From a **political feasibility** standpoint, this policy option is highly opportune. Egypt has demonstrated a clear appetite for child-sensitive reforms, evidenced by recent positive developments such as the establishment of child-friendly courts (OECD, 2023). Furthermore, the active engagement of key national entities like the NCCM and the NCCPIM&TiP, in collaboration with international organizations such as UNICEF, IOM, and UNHCR, underscores a significant political will. The existing NCCM SOPs (NCCM, 2020), developed in alignment with international mandates, provide a robust foundation upon which to build comprehensive child-friendly asylum procedures.

However, from an **administrative and technical** perspective, the successful implementation of this policy presents some limitations. The transition of the RSD process from UNHCR to the newly established PCRA remains relatively ambiguous, with the specific details regarding bylaws and executive regulations still under development (RPE & EIPR, 2024). It is currently unclear to what extent UNHCR will directly support the capacitation of government cadres in child-friendly asylum procedures, including BIPs. Moreover, national capacities responsible for issuing residence permits under MoFA already face some backlogs, leading to prolonged

waiting times for asylum seekers and refugees ([Bahar, 2024](#)). Critically, these processes are not yet adequately tailored or sensitive to the specific needs of UASC ([Muco & Webb, 2022](#)). Therefore, while resources, including existing SOPs and inter-agency task forces, provide a strong base, proactive investment in specialized training, increased personnel, and streamlined administrative processes will be essential to meet international standards set by UNHCR and effectively serve UASC.

Financially, the timing for this initiative is particularly opportune. There are already substantial financial commitments from international partners to Egypt, offering a clear opportunity to bolster the nation's asylum framework. A recent and significant example is the EU's 7.4-billion-euro strategic partnership with Egypt (2024-2027), which includes approximately 200 million euros directly earmarked for migration management. This substantial funding stream presents a perfect opportunity to enhance the implementation of Egypt's new asylum law, specifically by embedding and resourcing comprehensive child-friendly approaches, thereby ensuring that financial resources are directed towards the most vulnerable asylum seekers. Additionally, this policy option in and of itself is cost-efficient, given that there will be no need for investment in infrastructure, as it already exists; the cost will be focused on capacity building and production of guidelines if need be.

An Integrated, AI-Enhanced National Coordination Platform

The Egyptian government has taken some serious steps towards acknowledging the significant importance of AI and its merits in decision-making. This is evident by passing the country's second edition of AI strategy (2025-2030) ([Egypt National Artificial Intelligence Strategy, 2025](#)). Additionally, the country has a growing digital infrastructure, offering the potential to streamline data sharing, service coordination, and referrals across child protection actors. From a technological perspective, establishing such an integrated platform is feasible; however, from a technical standpoint, this alternative might not be feasible in the short term. Establishing, managing, and using such a platform requires highly trained and skilled staff across all concerned stakeholders, including government agencies at both the central and local levels. Notwithstanding the government efforts to build digital and technology skills for public sector employees, the advanced and sophisticated AI technology might be a challenge for many government agencies, not only in Egypt but worldwide as well ([Elsafty et al., 2023](#)).

Similarly, identifying the agency responsible for assuming the ownership of and managing the platform might be problematic from an administrative perspective, given the involvement of several government agencies with high stakes in the issue. While the NCCM might appear to be the most relevant government agency, the sensitive nature of data plausibly requires the ownership of the MOI

or other security agencies.

From a political perspective, this platform requires data sharing with several stakeholders, including international organizations and local nonprofit organizations, a degree of openness that might not be highly supported by the government. (Andersen Egypt, 2025)

Additionally, this option requires huge financial investments to build, manage, and maintain the system. With Egypt's current economic situation, it is not expected that the government would prioritize spending on such a platform, especially given the relatively small UACS population size.

As such, while this policy alternative might lead to remarkable improvements in UASC protection, we believe that it is not the most feasible option at least in the short term.

Formalizing Refugee-Led Organizations and Community-Based Organizations for UASC Support in Egypt:

The policy solution of formalizing and legalizing RLOs and CBOs in Egypt represents a strategic shift from informal, precarious operations to recognized, empowered partnerships. This approach acknowledges the unique strengths RLOs, and CBOs bring to the protection landscape, particularly their deep understanding of community needs, cultural sensitivity, and ability to reach vulnerable populations, including migrant and asylum seeking UASC, that traditional aid actors often cannot. Legalization would unlock access to formal funding, training, and legitimate engagement with government and international bodies, transforming them from informal service providers into credible, sustainable partners.

Technically and administratively, on the part of the government, the formalization process requires a pragmatic approach. This includes simplifying registration procedures. A specialized unit within MoSS already exists and provides clear guidelines, offering capacity-building support on legal compliance, governance, and financial management for local NGOs. Under this policy option, the only addition would be to expand this support to RLOs and CBOs and act as the liaison between these organizations and other government entities, including PCRA. Leveraging the already existing technology for online registration, reporting, and information dissemination can further streamline these processes to also accommodate and allow access to RLOs and CBOs to register themselves through them. The administrative shift also directly aligns with the direction of the concerned governmental bodies, especially looking at the gains that could come out of such change (i.e. Data collection and close monitoring over the activities of RLOs and CBOs, and a more accurate figure of the number of UASC present in Egypt). Therefore, despite

the initial administrative and technical capacity building, the option presents a higher benefit in the long term ([Kasmo, 2023](#)).

While it may appear at first glance that this option is not politically viable, we believe that from a **political feasibility** standpoint, this policy option directly aligns with the government's intention to have a more active role and take ownership over the migration and asylum portfolio. Formalizing RLOs and CBOs enables MoSS and the Egyptian government to put the activities of such organizations under the overall monitoring and ownership of the government, ultimately leading to the enhancement of national capacity and the streamlining of humanitarian efforts. Needless to say, community-led initiatives are both cost-effective and efficient, with strong potential to alleviate pressure on state services. Moreover, such formalization brings greater transparency, accountability, and the ability for the government to better understand and coordinate with these vital actors, rather than having them operate completely outside formal oversight. Moreover, the law ([No. 149 of 2019 on Regulating the Exercise of Civil Work and its Executive Regulations \(Ministerial Decree No. 104 of 2021, published in January 2021\)](#)), in contrast to its highly restrictive predecessor, facilitates the establishment of NGOs by mere notification rather than requiring prior approval, and abolishes imprisonment penalties for violations, replacing them with financial and administrative fines. This shift indicates a move towards fostering a more cooperative relationship, recognizing NGOs as partners in development, and reducing the previous atmosphere of suspicion and control. Furthermore, the law allows for the operation of foreign NGOs and CSOs within the country but subjects them to a more stringent regulatory framework than that applied to domestic organizations. To begin operations, foreign NGOs must secure prior approval from MoFA, a licensing process that assesses their proposed activities, geographical scope, and duration. Once this initial approval is granted, they are then required to notify MoSS, providing comprehensive documentation about their parent organization, legal status of foreign staff, and detailed plans for their work in Egypt. Despite the specific governance limitations faced by foreign NGOs—such as the cap of 25% on non-Egyptian members within their boards of directors or general assemblies, and strict regulations on the employment of foreign personnel, who require permits from the MoSS—this policy option nonetheless demonstrates both the political will and the practical feasibility of implementation (Egypt Law No. 149/2019; Egypt Ministerial Decree No. 104/2021).

Financially, the legalization of RLOs/CBOs holds immense potential for unlocking new funding streams. Currently, many international donors are hesitant to provide direct funding to unregistered entities due to compliance and accountability concerns. Formal status would enable RLOs/CBOs to open official bank accounts, sign agreements, and directly access grants from international organizations, philanthropic foundations, and even the Egyptian private sector. This decentralization of funding, moving away from solely large international NGOs,

would empower local initiatives to tailor programs more effectively to the specific needs of their communities, especially for vulnerable groups like UASC. While there might be initial administrative costs for the government in processing registrations and providing oversight, the long-term financial benefits include a more diversified and robust humanitarian funding landscape for refugee response, potentially reducing the financial burden on the state. Additionally, the fact that this option aligns with the localization and nexus-programming focus of large donors and the Development Assistance Committee (DAC)'s recommendations ([OECD, 2025](#)) opens more doors for international funding that would be aiming at supporting refugee self-reliance. Moreover, any foreign funding whether for local or foreign NGOs, falls under close monitoring, necessitating timely notification to MoSS and subsequent approval before funds can be disbursed, reinforcing the government's continued desire for significant oversight of the civil society sector (Egypt Law No. 149/2019; Egypt Ministerial Decree No. 104/2021).

B- Policy Recommendations

Building on the preceding analysis of policy alternatives and their feasibility and challenges, this section identifies the most viable options for strengthening protection systems for UASC in Egypt. Drawing on the previous evaluation, we prioritize policies that not only meet protection needs but also align with Egypt's institutional capacities, political context, and available resources.

The Developing Child-Friendly Asylum Procedures within the New Asylum Law Framework: This policy option in and of itself is cost-efficient given that there will be no need for investment in infrastructure as it already exists. The cost will rather be focused on capacity building and production of guidelines if need be.

Moreover, it capitalizes on Egypt's current development of executive bylaws for its new Asylum Law to incorporate child-sensitive approaches for UASC. It is politically well-timed, supported by recent reforms such as child-friendly courts and the involvement of key agencies like NCCM and international actors ([OECD, 2023](#)) ([NCCM, 2020](#)). However, administrative and technical challenges persist due to the transition from UNHCR to PCRA and unclear institutional responsibilities ([RPE & EIPR, 2024](#)). Financially, the EU's €7.4 billion partnership with Egypt (2024–2027), including €200 million for migration, offers a rare opportunity to fund capacity building and child-focused implementation.

Expanding the National Family-Based Alternative Care System to Include Refugee and Migrant UASC: This policy is among the most feasible options, leveraging Egypt's existing family-based alternative care system managed by the Ministry of Social Solidarity, which has successfully handled over 12,323 cases across governorates ([Egypt Today, 2025](#)). It requires no new technological investment and is both administratively and technically viable due to the Ministry's decentralized infrastructure. While additional training may be necessary to address the unique

needs of refugee children, this would have minimal financial implications, especially with potential support from international organizations like UNICEF and UNHCR ([UNICEF, 2024](#)). Politically, although initial concerns existed, resistance is expected to be limited. There is no organized anti-refugee movement with enough influence to block the policy (National Center for Middle East Studies, 2024), and public opposition is generally rooted in socioeconomic concerns, not children's welfare. Furthermore, the religious endorsement of family-based care by institutions like Dar Al Ifta and Al Azhar supports societal acceptance (Egypt's Dar El-Iftah, 2005), and the small number of UASC undermines fears of widespread non-Egyptian adoptions ([fmreview.org, n.d](#)).

Formalizing Refugee-Led Organizations and Community-Based Organizations for UASC Support in Egypt: This policy recommendation offers a strategic shift from informal operations to structured, empowered partnerships that enhance service delivery for vulnerable groups like UASC by leveraging these organizations' deep community knowledge and access. Technically and administratively feasible, this policy builds on the Ministry of Social Solidarity's existing systems, which could be expanded to support RLOs and CBOs with clear registration procedures and capacity-building mechanisms ([Kasmo, 2023](#)). Politically, it aligns with the government's intent to exert greater ownership over migration governance, enhances national capacity, and promotes accountability and transparency, particularly under the enabling environment created by ([law No. 149 of 2019 on Regulating the Exercise of Civil Work and its Executive Regulations \(Ministerial Decree No. 104 of 2021, published in January 2021\)](#)). This legislation simplifies NGO registration and fosters cooperation while maintaining oversight (Egypt Law No. 149/2019) ([Egypt Ministerial Decree No. 104/2021](#)). Financially, legal status would unlock access to diverse funding streams by allowing RLOs and CBOs to directly receive grants and engage with donors, reducing reliance on large INGOs. This aligns with the localization and self-reliance priorities emphasized in OECD's DAC recommendations, potentially diversifying humanitarian funding and easing the financial burden on the state ([OECD, 2025](#)).

In conclusion, the combined implementation of these three policy recommendations—**developing child-friendly asylum procedures, formalizing refugee-led and community-based organizations, and expanding the national family-based alternative care system to include refugee and migrant UASC**—offers a comprehensive, feasible, and rights-based approach to strengthening Egypt's national protection framework. Together, they address structural, legal, and community-level gaps while capitalizing on existing infrastructure, growing political momentum, and significant international funding opportunities. By embedding child sensitivity in the asylum system, empowering local refugee actors, and extending proven care models to non-citizen children, Egypt can demonstrate leadership in inclusive migration governance, reinforce its international commitments, and

ensure that the most vulnerable children are protected, integrated, and given the opportunity to thrive within a cohesive and sustainable national system.

Conclusion

Egypt is uniquely positioned to lead in regional child protection and migration governance. Its legal and institutional infrastructure, combined with its history of hosting displaced populations, gives it the tools to translate international obligations into national progress (Bahar, 2024; United Nations Children's Fund, 2024). By proactively adopting inclusive, adaptive, and sustainable reforms, Egypt can strengthen its international standing, reduce pressure on public systems, and deliver protection for all children on its soil.

This policy paper has outlined a set of actionable, feasible, and normatively grounded solutions that prioritize technological innovation, legal alignment, and community engagement. The proposed strategy balances immediate practicality with longer-term structural transformation. It recognizes that protecting UASC is not merely a legal or logistical matter, but a moral obligation.

These recommendations are not about creating separate systems for migrant and asylum seeking UASC. Instead, they are about reinforcing national systems to be more inclusive, efficient, and resilient. The path forward lies not only in urgency but in the opportunity to create a child protection system that works better for every child, now and into the future.

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Education



Protection



Health



Labor



**Community
Cohesion**