

Fundamental Rights Officer

Annual Report 2025



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List of abbreviations

Term	Definition
AST	Asylum Support Team
EUAA	European Union Agency for Asylum
FRO	Fundamental Rights Officer





Foreword



The past year was marked by a phase of consolidation in the activities of the Office of the Fundamental Rights Officer. Efforts focused on establishing structures, processes and tools to integrate fundamental rights considerations throughout the work of the EU Agency for Asylum (EUAA). This work helped to position the Office of the Fundamental Rights Officer as a fully-fledged entity of the Agency while maintaining its independence.

To reinforce fundamental rights throughout the Agency's activities, the EUAA adopted its first annual fundamental rights action plan. The fundamental rights focal points, newly appointed by the EUAA Executive Director in 2025, played a key role in keeping my office informed on the progress made with the action plan.

Visits by my office to the EUAA's operational locations in 2025 helped to evaluate possible fundamental rights-

related risks in the Agency's activities. These were noted in observation reports that were shared with the Agency. With the support of the Agency's fundamental rights focal points, my office monitored progress on the corrective actions taken by the Agency.

An accessible complaints mechanism ensures the accountability of the Agency in potential violations of fundamental rights in its operations. In 2025, the EUAA continued to encourage access to the complaints mechanism, resulting in the handling of the first admissible complaint.

With the implementation of the Pact on Migration and Asylum around the corner, the Agency will be called upon to support Member States under migratory pressure or at risk of migratory pressure and will be operating in challenging contexts. In 2026, my office will focus its work on preparing the Agency to continue operations in full compliance with the fundamental rights of persons seeking international protection within the new framework of the Pact implementation. With robust processes in place and continued support from my office, I believe that the EUAA, as an Agency of the European Union, a community of shared values with fundamental rights and the rule of law as foundations, remains instrumental in supporting national authorities in this complex endeavour.

François Deleu

Fundamental Rights Officer
European Union Agency for Asylum



1. Introduction

In compliance with the EUAA Regulation ⁽¹⁾, the Fundamental Rights Officer (FRO) of the European Union Agency for Asylum (EUAA) has played a central role since his appointment in May 2023 in supporting the Agency to uphold and promote fundamental rights in all of its activities.

This report, the second official publication issued by the Office of the FRO ⁽²⁾, provides an overview of its work and developments in 2025. It provides an overview of the EUAA's [Fundamental Rights Strategy 2024-2028](#) and the progress made in its implementation. It examines the activities of the Office of the FRO in providing operational and technical assistance to Member States and presents the main findings of consultations, visits and observations which were carried out in this context. It reports on the first full phase of operationalisation of the EUAA complaints mechanism and concludes with an outlook on priorities and activities for 2026.

By presenting the office's activities, results and priorities, this report reflects the FRO's commitment to **transparency**, which is one of the guiding principles of the EUAA's Fundamental Rights Strategy.

The EUAA Fundamental Rights Officer

The Fundamental Rights Officer is appointed in accordance with Article 49 of the EUAA Regulation. The FRO is responsible for ensuring the Agency's compliance with fundamental rights in all its activities and promoting respect for fundamental rights within the Agency.

The FRO is independent in the performance of his duties and reports directly to the Agency's Management Board.

In the exercise of his mandate, the FRO supports the mainstreaming of fundamental rights across the Agency's activities. In carrying out these tasks, the FRO benefits from the support of the Office of the FRO and has access to all information relevant to fundamental rights in the context of the Agency's activities.

¹⁾ Regulation (EU) 2021/2303 of the European Parliament and of the Council of 15 December 2021 on the European Union Agency for Asylum and repealing Regulation (EU) No 439/2010, (OJ L 468, 30.12.2021)

²⁾ The first official publication by the EUAA FRO was published on 14 July 2025 and can be found [here](#).



2. Mainstreaming fundamental rights: Progress in implementing the EUAA's Fundamental Rights Strategy 2024-2028

On 25 September 2024, the EUAA adopted its first Fundamental Rights Strategy for the period 2024–2028. This landmark multi-annual document sets out the Agency's goals and strategic objectives to strengthen respect for and promotion of fundamental rights across all its areas of work, reflecting the Agency's commitment to ensure that fundamental rights considerations are fully integrated into the Agency's activities and decision-making processes.

To ensure that the strategy is translated into concrete and measurable actions, its implementation is governed by annual action plans. These plans define specific measures and indicators and provide a structured framework for the implementation of activities and assessment of their progress, in accordance with the principles of transparency and accountability.

In May 2025, following a broad and inclusive consultation process between the Office of the FRO and all entities within the Agency, the Executive Director adopted the Action Plan 2025 for the implementation of the Fundamental Rights Strategy. The consultative process brought together expertise from across the EUAA, thereby reflecting the Agency's shared and collective ownership of fundamental rights objectives. The action plan 2025 set out 38 measures which are complemented by 27 indicators, outlining how the Agency will advance the strategy's seven strategic objectives during the year.

The actions identified in the plan were diverse and composite – including the introduction of innovative approaches, the development of new tools and procedures, and the reinforcement of existing practices through a stronger and more explicit fundamental rights perspective. The measures identified under the action plan 2025 covered all areas of the Agency's work, encompassing operational and technical assistance to Member States, the Agency's monitoring mechanism, the European asylum curriculum, and the provision of technical and specialised support through practical tools and guidance. They also addressed cooperation with external stakeholders, as well as internal processes, including human resources and procurement.

A key instrument to support both the implementation and monitoring of the action plan 2025 was the establishment of the Agency's network of fundamental rights focal points. Their appointment fostered dialogue, mutual learning and strengthened cross-Agency collaboration in mainstreaming fundamental rights-based processes.

Throughout 2025, progress was regularly monitored, and mid-year and year-end updates were provided to the Management Board, ensuring continuous commitment and transparency.



By the end of 2025, 65% of the planned measures had been fully implemented. Around 30% of activities were still ongoing, with two rescheduled to the following year and one cancelled because the objective of the measure was achieved by different means.

The FRO assessed the overall implementation of the first action plan to be positive, in particular as it marked the initial phase of putting into practice the EUAA's first multi-annual Fundamental Rights Strategy. Significant effort was invested not only in carrying out specific activities, but also in establishing key processes, developing guiding concepts and building the structures necessary for sustainable, long-term implementation.

In this context, the FRO welcomed the extensive cross-Agency consultations in late 2025 to define the measures and indicators for the action plan 2026. The new plan, expected to be finalised and adopted in 2026, will ensure continuity of ongoing activities, provide follow-up to actions initiated in 2025, and introduce new measures to further advance the implementation of the strategy.

2.1. Establishing the Agency's internal network of fundamental rights focal points

By decision of the Executive Director in April 2025, an Agency-wide network of fundamental rights focal points was formally established. Its purpose is to facilitate structured and continuous collaboration between the FRO and the Agency's centres, thereby enabling all entities to contribute actively to ensure compliance with fundamental rights in every aspect of the Agency's activities. By bringing together representatives from different professional backgrounds and areas of expertise, the network promotes a multidisciplinary and cross-cutting vision, which strengthens mutual understanding and reinforces a culture of collective exchanges.

The fundamental rights focal points serve as key interlocutors within their respective centres to highlight fundamental rights matters in their areas of responsibility and facilitate internal reflection and awareness. In addition, they work closely with the Office of the FRO in preparing annual action plans and contributing to reporting on progress in their implementation.

To foster collaboration, knowledge-sharing and a cohesive network, the Office of the FRO organised several dedicated exchanges with the fundamental rights focal points throughout 2025. In addition, on 10 December 2025 on the occasion of International Human Rights Day, the network convened, after the EUAA Fundamental Rights Conference, with external experts for an end-of-year exchange to reflect on the achievements and challenges of 2025 and

discuss forward-looking priorities for 2026, including in the framework of the implementation of the Pact on Migration and Asylum.

The first EUAA Fundamental Rights Conference

On 10 December 2025 on the occasion of International Human Rights Day, the Office of the FRO organised the Agency's first Fundamental Rights Conference. The event provided a platform for knowledge-sharing and discussion on emerging challenges, developments and complexities related to fundamental rights in the asylum context in Europe. It also reflected the commitment of the Agency to uphold and promote fundamental rights in its daily work.

Hosted online, the event gathered more than 220 participants, including EU Agencies, the Council of Europe, academia and EUAA staff. The conference was opened by the Agency's Executive Director and the FRO, followed by a panel discussion on the protection of fundamental rights in asylum and reception, the role of EU bodies, and specially the EUAA's role in this field.

The conference offered EUAA personnel the opportunity to actively engage with speakers, including through a dedicated session for the fundamental rights focal points, fostering meaningful dialogue and reinforcing shared responsibility for embedding fundamental rights considerations in all aspects of the Agency's work.



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2.2. Consultations on the Agency's processes and deliverables

To support the strategy's objectives, the EUAA consults the FRO on the Agency's processes and key deliverables, including training material, tools and guides. In this framework, the Office of the FRO provides guidance and support to ensure that fundamental rights considerations are adequately integrated and mainstreamed across the Agency. By drawing on relevant literature, jurisprudence and legal frameworks, the FRO supports the alignment of the Agency's work with fundamental rights.



During 2025, the Office of the FRO delivered 29 consultations ⁽³⁾, which were requested by the Operational Support Centre (4 consultations), the Training and Professional Development Centre (3), the Asylum Knowledge Centre (16), the Institutional and Horizontal Affairs Centre (5) and the Administration Centre (1).

Through these consultations, the office contributed to the development of quality assurance tools in providing operational and technical assistance on the ground, in particular related to registration and vulnerabilities. The office further supported the development of training modules on reception, vulnerability, asylum interviews, trafficking in human beings and the fundamental rights legal framework. The FRO contributed to the integration of fundamental rights considerations in the revised methodology for the EUAA Monitoring Mechanism and in monitoring exercises conducted in 2025, as well as in the drafting of EUAA practical guides (including on age assessment, screening, standards and indicators in reception, the solidarity mechanism and the accelerated examination procedure).

³⁾ Data presented in this report is based on the most current sources available at the time of drafting. While every effort has been made to ensure the accuracy, completeness and relevance of the information, data analyses may involve inherent limitations, including possible discrepancies due to data collection methods, evolving datasets or human error in interpretation or reporting.



3. Activities related to operational and technical assistance

The EUAA supports Member States through the provision of technical and operational assistance, defined in operational plans with each country. In 2025, the EUAA supported 12 Member States across 153 locations ⁽⁴⁾ through the deployment of 1,475 operational personnel ⁽⁵⁾ and approximately 500 interpreters ⁽⁶⁾.

3.1. Consultations on operational plans and evaluations

The FRO plays a crucial role in ensuring the Agency's compliance with fundamental rights across all its activities, particularly in operational and technical assistance activities, where the risks to fundamental rights non-compliance are most pronounced. This is where the FRO plays a crucial role and is involved throughout the entire operational cycle, including planning, implementation, monitoring and evaluation.



In 2025, the Office of the FRO provided five consultations on the Agency's operational plans and amendments ⁽⁷⁾, in addition to seven consultations on the evaluation of operational plans.

3.2. Operational visits and observations

The Office of the FRO may conduct visits to locations where the Agency carries out operational activities. During such visits, the office identifies any gaps, risks and mitigating measures to ensure that the Agency's operational activities respect and uphold fundamental rights. Following an operational visit, the FRO shares the observation report with the Agency,

⁴⁾ 'Location' figures exclude roving teams and do not provide a breakdown of individual offices or facilities within the same city. Multiple offices or entities situated in a single city are consolidated and reported as one location.

⁵⁾ 'Operational personnel' figures are calculated using a single body count methodology. Each individual is counted only once per reporting year, regardless of the number of deployments undertaken. This includes cases when an individual participated in multiple deployments of the same or different types, whether within the same EUAA operation or across different operations during the same year.

⁶⁾ 'Interpreter' figures are calculated on the basis of the annual average full-time equivalent (FTE) across all EUAA operations.

⁷⁾ An operational plan is a formal, binding document which is concluded by the Executive Director and the Member State in need of assistance, in accordance with Article 18 of the EUAA Regulation. When a need arises, a structured needs assessment is initiated by the EUAA, including through dialogue and consultations with the Member State, with a view to jointly defining possible assistance measures. Such measures, as well as the means to implement them, are detailed in the operational plan. For more information, visit the [EUAA website](#).



including a set of individual observations ⁽⁸⁾ which identify fundamental rights-related risks, issues that emerged during the visit and proposals for mitigating measures.

The Agency, in turn, provides a consolidated reply to the individual observations, outlining measures to address, resolve or mitigate the identified risks and issues. It should be noted that the Agency response is often composite and multi-layered, consisting of a range of actions and tools already in place, as well as newly developed, adjusted or replicated actions applicable to the specific operational context. Accordingly, the FRO observations are a pivotal instrument to inform, strengthen, refine or further guide the Agency's operational activity in compliance with the respect and promotion of fundamental rights.

Furthermore, in coordination with the Agency's Operational Support Centre, the FRO has established a system to monitor the response and the implementation of the preventive and mitigating measures which were identified in the observations.

⁸⁾ Individual observation is specific, evidence-based and relates to a particular aspect of operational support (e.g. asylum or reception). An individual observation describes a concrete situation, practice, gap, safeguard, challenge or risk, and assesses its implications for fundamental rights. It may identify potential or actual risks of fundamental rights violations, and typically includes suggested mitigation measures to prevent, address or respond to such risks. Suggested mitigating measures may refer to good practices already established in other operations. Each observation is prioritised (high, medium or low) and contributes to guiding management responses and operational improvements within the framework of the operational plan.



Good practice: Involvement of fundamental rights focal points during FRO operational visits

Appointed by the Executive Director, fundamental rights focal points in operations play a central role in coordinating with the Office of the FRO, particularly in the context of operational visits. They facilitate structured information exchange and ensure appropriate follow-up at the operational level. Acting as key interlocutors between their respective country operations and the Office of the FRO, the fundamental rights focal points in operations ensure continuous coordination and effective communication.

During 2025, the role and involvement of fundamental rights focal points in operations were further consolidated. In particular, they actively participated in operational visits alongside the Office of the FRO and, drawing on their specialist knowledge of the Agency's country operations, contributed to targeted exchanges related to fundamental rights with the EUAA's Asylum Support Team (AST) experts. In addition, the fundamental rights focal points supported information-exchange and coordination through their participation in meetings which were held prior to and following operational visits.

Their enhanced collaboration with the office also extends to monitoring the Agency's response to the FRO's observations through designated tools. In this context, the fundamental rights focal points facilitate the follow-up to FRO observations, as their direct involvement in the operational visits and related exchanges provides them with a clear understanding of the findings and recommendations issued by the Office of the FRO.

Alongside other initiatives taken by the Agency, this approach represents one of the good practices that embed fundamental rights expertise directly within the Agency's operational structures. By strengthening coordination, accountability and follow-up mechanisms, the involvement of fundamental rights focal points in operations enhances transparency, supports the timely implementation of the FRO's recommendations and contributes to a sustained and systematic integration of fundamental rights across the Agency's operational and technical activities.



In 2025, the office conducted seven operational visits. These visits enabled the assessment of the Agency's activities across 22 locations in the context of five operations (in Bulgaria, Cyprus, Greece, Italy and Romania). In the same year, the Office of the FRO submitted five observation reports to the Agency (following the operational visit conducted in the Netherlands at the end of 2024, and in Bulgaria, Cyprus, Italy and Romania in 2025), which contained 55 individual observations that required follow-up actions by the Agency.



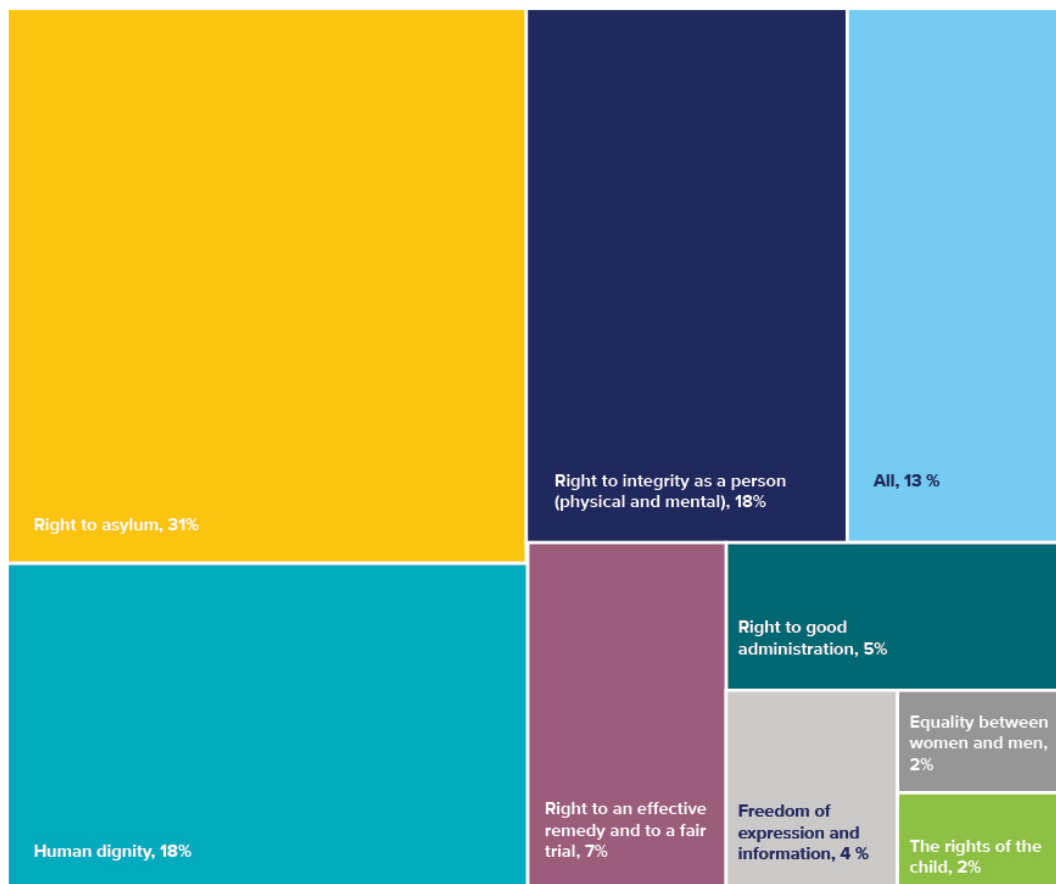
In line with the Agency's timeline for the submission of observation reports, individual observations on the operational visit in Greece were shared by the FRO at the beginning of 2026.

Individual observations issued by the Office of the FRO can be categorised according to their primary connection to the fundamental rights outlined in the EU Charter of Fundamental Rights, noting that each observation may intersect with multiple rights. In 2025, approximately 31% of the observations were primarily linked to the right to asylum, 18% to human dignity, 18% to the right to integrity as a person, 7% to the right to an effective remedy and a fair trial, and 5% to the right to good administration (see *Figure 1*).

55% of these observations were addressed to the Agency with the aim of improving the quality of its operational support from a fundamental rights perspective, thus helping to mitigate the risk of potential fundamental rights violations. They included suggestions on how the Agency could develop or adjust its tools and procedures accordingly. In 40% of the cases, the observations were related to gaps or challenges in the national/operational context that may negatively impact the intervention of the Agency and therefore pose a risk to the Agency's compliance with fundamental rights. 5% of the observations referred to instances where further support from the Agency could have a positive impact on the promotion and respect of fundamental rights. In this regard, the Agency may agree with the national authorities to increase or adjust its support to address these opportunities to actively promote fundamental rights either through the current or a future operational plan.



Figure 1. Number of individual observations in 2025 by corresponding fundamental right ⁽⁹⁾



By the end of 2025, the Office of the FRO received consolidated responses from the Agency to 11 out of 55 individual observations submitted in 2025. Of these 11 observations, the Agency accepted or partially accepted ten and did not accept one ⁽¹⁰⁾. In its responses, the Agency has identified follow-up measures for the implementation of the FRO's observations that were accepted or partially accepted.

The Office of the FRO monitors the responses to all individual observations. Between 2023 and the end of 2025, the Office of the FRO monitored responses to 90 individual observations ⁽¹¹⁾. Of these, 79 observations were accepted or partially accepted by the Agency, leading to the identification of 110 follow-up measures associated with the observations. According to data shared by the Agency, 65% of the measures were implemented, 15% are ongoing, 5% have not yet started and 11% have been discontinued (see *Figure 2*). Follow-up measures were discontinued primarily because the scope of support

⁹⁾ 'All' refers to instances where the risk or the gap outlined in the individual observation is not primarily linked to one specific fundamental right and may rather have implications for all fundamental rights in general.

¹⁰⁾ The Agency may not accept FRO observations when it is assessed that the observation goes beyond the scope of the Agency's intervention or support requested by the national authority.

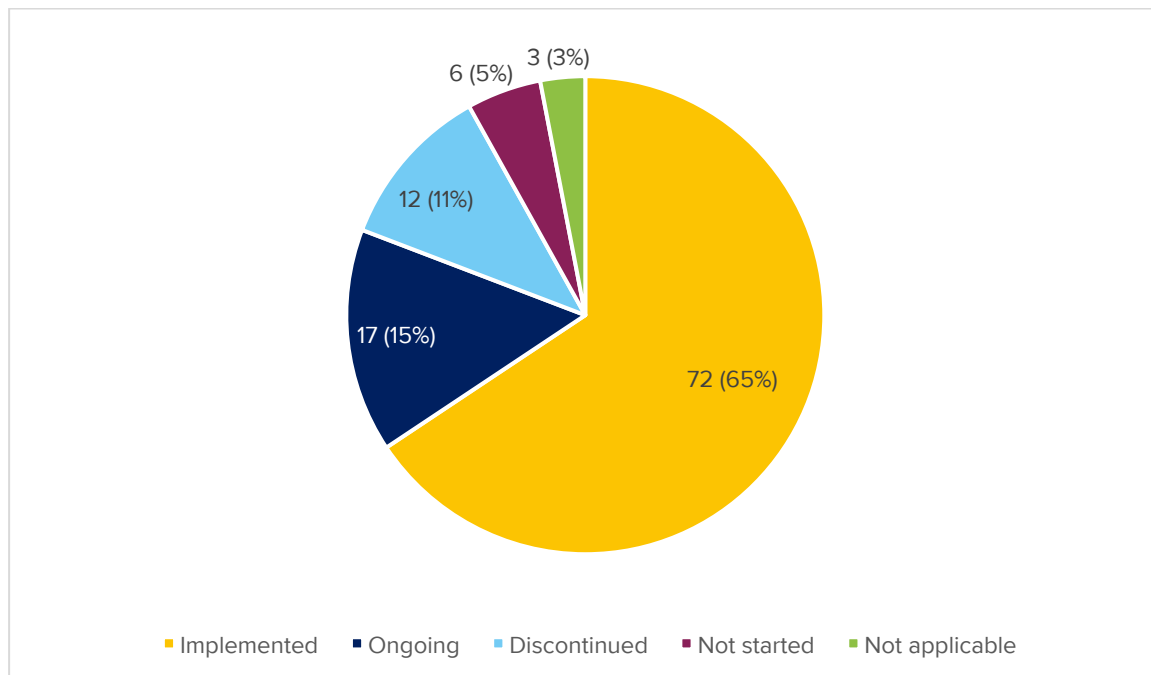
¹¹⁾ Some observations may refer to similar issues in different operations.



under the operational plan ended or changed and no longer included the measures that were the subject of the observations.

By the end of 2025, the FRO considered that 69 out of 90 observations that were responded to were closed, meaning that no further action was required by the Agency.

Figure 2. Implementation status of follow-up measures in 2023-2025



3.3. Types of observations issued by the Office of the FRO

Observations from operational visits are predominantly country-specific and reflect particular challenges faced in the location. Nonetheless, cross-cutting issues can be identified, with varying nuances. This underscores the holistic nature of the FRO's contribution to the Agency's operational and technical assistance to Member States.

This section synthesises the main areas of analysis in the context of operational visits in 2025 through the office's observations and the key aspects of follow-up measures implemented by the Agency in its country operations in response to past FRO observations, issued in 2023 and 2024. This approach links the concerns raised by the Office of the FRO and the corrective and preventive actions undertaken by the Agency.

For clarity and coherence, the content of this section is organised into five thematic sub-sections. These cover horizontal and cross-cutting topics, issues related to asylum procedures, matters concerning reception conditions and standards, considerations applicable to children and unaccompanied children, and aspects relating to applicants in vulnerable situations.



As a general consideration, Member States may request the support of the EUAA when they identify a need with regard to the implementation of their obligations under the Common European Asylum System or in the case of disproportionate pressure or migratory challenges. These circumstances can have a negative impact on a national authority's temporary capacity to uphold operational standards. The support provided by the Agency, therefore, almost by default, offers additional guarantees for fundamental rights compliance. In addition, the Agency has put in place its own mechanisms, including risk management processes, to ensure that inherent risks in providing operational support are duly and timely identified.

3.3.1. Horizontal and cross-cutting topics

As an overarching observation about the Agency's country operations, the Office of the FRO continued in 2025 to emphasise the importance of ensuring that AST experts deployed in country operations are clearly identifiable as personnel acting on behalf of the Agency. Clear identification is considered a prerequisite for the effective functioning of the complaints mechanism (see *Section 4*). Potential complainants, primarily applicants for international protection, must be able to recognise when they are interacting with the members of EUAA ASTs in order to exercise their rights effectively. Enhanced visibility contributes directly to accountability, transparency and trust in the Agency's activities. In this context, the FRO also highlighted the importance of ensuring the Agency's visibility in digital interactions, for example when conducting remote asylum interviews.

In response to similar observations on the visibility of ASTs which were raised by the Office of the FRO in previous years, the Agency undertook a number of follow-up measures in 2025. These included the development and dissemination of dedicated visibility guidelines for country operations, as well as the organisation of information sessions within operational contexts to reinforce awareness. In addition, the Agency designed new branded clothing to enhance the recognisability of ASTs, the distribution of which commenced in 2025 across country operations.

Building on the existing structures for reporting and escalating potential violations of fundamental rights and international protection obligations of the host Member State in the context of the Agency's operational and technical assistance, the Office of the FRO continued throughout 2025 to promote the comprehensive roll-out of the escalation mechanism⁽¹²⁾. This includes ensuring that AST experts can rely on clear and comprehensive procedures for reporting, assessing, recording and escalating potential violations. The need for adequate training on the mechanism was also highlighted. The Agency developed standardised reporting templates and, in 2025, piloted the mechanism in two country operations.

Another cross-cutting observation that the Office of the FRO continued to raise in 2025 was the need to ensure sufficient interpretation services for activities supported by the Agency's AST experts. In response to similar observations raised in previous years, the Agency continued to actively address the challenges. These measures included systematically raising

¹²⁾ Article 18(6)(c) grants the Executive Director the authority to suspend or terminate the deployment of Asylum Support Teams if, after consultation with the Fundamental Rights Officer, it is determined that serious violations of fundamental rights or international protection obligations by the host Member State have occurred or are likely to persist.



the issue with national authorities in the context of new operational plans or related amendments, as well as providing targeted support through ad hoc deployments or time-bound interpretation arrangements to address urgent operational needs.



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3.3.2. Asylum procedure

The Office of the FRO recognises that the right to asylum lies at the core of all the Agency's activities, and the Agency promotes this right through the support provided in asylum procedures in Member States.

Building on the successful implementation of the EUAA's Quality Assurance Tool ⁽¹³⁾ for personal interviews and first instance decisions in the asylum procedure, in 2025 the Agency developed a Quality Assurance Tool for the quality review of registrations, which was also piloted in selected country operations. The Office of the FRO welcomed such development and, in its 2025 observations, highlighted the opportunities to implement structured quality assurance procedures for asylum registrations in some operations.

In response to the need to conduct registration activities in locations that ensure confidentiality and privacy, in 2025 the Agency carried out a mapping exercise in some country operations to identify locations which required improvements, for example by installing sound-reducing separators. Additionally, in response to the FRO's emphasis to properly identify and record vulnerabilities at the registration stage, the Agency proposed several mitigating measures in 2025, including support to national authorities in reviewing registration templates and standard operating procedures, as well as guidance to AST experts on the recording of vulnerabilities through ad hoc arrangements.



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¹³⁾ The Quality Assurance Tool application (QAT app) is an EUAA-developed, user-friendly tool for a more streamlined and efficient internal quality assurance process. It allows the user to systematically assess the quality of personal interviews and first instance decisions in the asylum procedure. It provides insights into the overall quality of the interviewing and decision-making processes, and assists in identifying possible weaker points for which follow-up actions may be needed while highlighting good practices. For more information on the tool, please see [here](#).

Following past observations from the FRO, updates were made in 2025 to the information on temporary protection which is provided by AST experts in certain country operations. This included particularly information on effective remedies when temporary protection is denied.

In its 2025 observations, the Office of the FRO highlighted improvements which could be made in the examination of asylum applications. For example, adequate preparation time should be dedicated for EUAA case officers to familiarise themselves with an applicant's file and to consider relevant individual, procedural and contextual elements. In line with its practice, the Agency continued with capacity-building efforts to address the need by training and coaching sessions to AST experts, and by undertaking quality assurance exercises and enforcing existing work instructions.

3.3.3. Reception conditions and standards

The Office of the FRO recognises that the rights to human dignity and integrity of applicants for international protection lies at the core of the Agency's activities, and the specific support in reception which is provided by the Agency in Member States plays a role to support and promote these rights.

The Office of the FRO repeatedly observed that supporting the reception of applicants in full compliance with fundamental rights may be particularly challenging in contexts where there are capacity constraints, including for applicants in vulnerable situations, or where the facilities require improvements to ensure a dignified standard of living. Such circumstances may require reinforced assessments or measures to ensure that the Agency's operational support remains fully aligned with fundamental rights.

In the 2025 observations, the office further highlighted on several occasions the need to strengthen information provision activities in reception facilities, including by developing standard information material that is regularly updated to reflect the most current legal and procedural frameworks.

In certain instances, the Agency may support the allocation of applicants for international protection to specific accommodation units or contribute to the mapping of maintenance needs within reception facilities. This may expose the Agency to potential fundamental rights risks when the accommodation units require further assessment or improvement. The Office of the FRO highlighted in its 2025 observations the need to develop and adopt standardised methodologies and procedures to systematically integrate maintenance findings into allocation processes. The office further emphasised the importance of establishing standard operating procedures that foster a rights-based approach to allocation and setting standard criteria to assess the suitability of accommodation units. Following similar past observations, the Agency conducted a mapping exercise in one country in 2025 to assess the conditions and suitability of housing units within reception facilities and agreed with the national authority to develop a standardised tool to evaluate their suitability, based on the EUAA's guidance on reception standards and indicators.

The Office of the FRO also emphasised the need to strengthen the safety and security of AST experts to enable them to respond effectively to incidents, both for their own safety and that



of applicants. This may be achieved through dedicated briefings, access to information on established national and local safety and security protocols, and targeted capacity-building and training sessions. Where safety and security concerns for both applicants and staff were observed in reception facilities, the Agency responded in specific country operations by coordinating with the national authority and reinforcing security briefings and training for AST experts.

As AST experts may regularly receive requests for assistance from applicants, ensuring a timely response is essential to safeguard applicants' right to access appropriate support. The office therefore highlighted in their 2025 observations the need for experts to be adequately equipped to guide applicants to the appropriate procedure, whether through a dedicated referral pathway or access to the relevant national complaints mechanism. In this context, the FRO emphasised the importance of establishing clear and standardised procedures for all types of referrals, particularly those concerning protection or high-risk cases and complaints of a serious nature.

The Agency may provide support to national authorities in self-assessing their reception conditions, and in this context, the Office of the FRO highlighted in its 2025 observations the need to ensure that, in case of direct support, the EUAA's findings are shared with national authorities in a manner that guarantees transparency and the accountability of the Agency. The office also emphasised that when customising the EUAA Assessment of Reception Conditions tool ⁽¹⁴⁾ to the national context it should remain as comprehensive as possible in covering common reception standards and indicators. In addition, when the Agency provides this support, the office also highlighted the potential relevance of having a dialogue with the national Ombudsperson, who often also has competency to assess reception conditions.

In previous observations, the FRO encouraged the Agency to raise concerns about applicants facing challenges affecting access to reception with the competent national authorities, and, if needed, to escalate them through the Agency's escalation mechanism. In response, the Agency implemented a range of follow-up measures in 2025. Following structured discussions with competent authorities, the Agency, in certain instances, redirected its operational support to assist national authorities in strengthening safeguards at the structural level. In other cases, the Agency further analysed the situation and, when necessary, adapted the work instructions for AST experts who are involved in the relevant workflows.

The Office of the FRO raised concerns in 2025 about an operational context in which the Agency's support was provided under conditions that may give rise to concerns related to the right to liberty, thereby undermining access to basic safeguards. The office repeatedly informed the Agency of the heightened risks of fundamental rights violations arising in this context. The office observed that such practices could hinder applicants' access to comprehensive and accurate information on the asylum procedure and available legal remedies. The office also underlined that ensuring fundamental rights-compliant support is

¹⁴⁾ This IT tool provides a practical solution for EU Member States and associated countries as it allows authorities to conduct self-assessments of reception conditions at the national level. It consists of the common reception standards and indicators which are outlined in two of the Agency's guidance documents on reception published in 2016 (general) and 2018 (unaccompanied children). The Assessment of Reception Conditions (ARC) tool can be accessed [here](#).



particularly challenging for applicants in situations of vulnerability who remain in the reception facility for undefined periods. The Office of the FRO continuously encouraged the Agency to raise the issue with the national authority and explore how its support can be adapted to ensure compliance with fundamental rights standards and international human rights obligations. In response and in view of the Pact implementation, the Agency is engaged in a structured dialogue with the relevant national authority about the matter and the safeguards to be put in place, particularly for persons with vulnerabilities.



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3.3.4. Children and unaccompanied children

The Office of the FRO recognises that the Agency's support to national authorities strengthens the effective implementation of the rights of the child in the asylum procedure.

In 2025, the Office of the FRO examined practices concerning the allocation of unaccompanied children to reception facilities, including, in certain cases, the temporary placement of children aged 16-17 in facilities designated for adults. In this context, the FRO highlighted the need to establish clear and pre-defined standard operating procedures and workflows to clarify the role of AST experts and actions required in cases of such allocations. The FRO also underlined the importance of conducting a preliminary best interests assessment prior to allocation, as well as ensuring dedicated and separated areas in reception facilities for unaccompanied children.

The Agency's activities on the ground continued to be affected by gaps and challenges in the functioning of certain national guardianship systems and age assessment procedures. On its own initiative or by building on previous FRO observations, in some cases the Agency redirected its direct operational support related to children in asylum and reception to assist national authorities in strengthening safeguards at a structural level when they were found to



be insufficient. In other instances, operational support related to children in asylum and reception was discontinued when the responsibility for establishing and managing guardianship systems and age assessment procedures sat with national authorities which were not covered by the operational plan, and therefore the Agency's ability to support national authorities in improving their procedures was limited. The Pact on Migration and Asylum is expected to foster greater alignment of guardianship and age assessment frameworks across EU Member States, thereby further enabling the direct operational support of the Agency to be in full compliance with fundamental rights standards.

The Office of the FRO acknowledged the significance of the Agency's child protection activities. Proactively or by following previous FRO observations, the Agency implemented a range of measures in 2025, including cooperation with national authorities to strengthen guidance and referral pathways for AST experts who are designated as child protection focal points. The Agency also further developed and promoted standard operating procedures for unaccompanied children, and raised concerns with national authorities when reception conditions for unaccompanied children were insufficient. The FRO further observed and welcomed the Agency's continued commitment to deploy AST experts with comprehensive child protection skills and expertise.

Given that the Agency's activities may be affected by the availability and accessibility of essential services, including education, leisure activities, psychosocial support and healthcare, the office continued to emphasise that the Agency's support to children should be provided in reception facilities specifically designed to safeguard their mental integrity and well-being. In response, the Agency implemented mitigating measures, including supporting national authorities in monitoring the length of children's stay and establishing mechanisms to ensure their timely transfer to adequate reception conditions. The Agency also assisted national authorities in conducting further analyses to assess compliance with the rights of the child.

3.3.5. Other applicants in vulnerable situations

The Office of the FRO recognises that the support of the Agency in the identification and referral of applicants in vulnerable situations fosters their rights to asylum, mental and physical integrity, and access to healthcare.

The Office of the FRO emphasised in 2025 the importance of ensuring special procedural guarantees for applicants in vulnerable situations across different operational contexts, as well as safeguarding fair asylum procedures. In particular, as per existing work instructions, the office underlined the importance of timely referrals of vulnerabilities which are identified during the first instance examination supported by AST experts, and for interviews to be conducted only when applicants are duly informed, mentally and physically capable, and provided with adequate support, including sufficient time to prepare effectively for the interviews. These safeguards are essential to ensure effective access to procedures and to enable applicants to present the elements necessary to substantiate their application for international protection.

In previous observations, the Office of the FRO identified areas where further improvements were necessary with regard to persons in vulnerable situations. In this framework, the Agency



implemented a range of mitigating measures in 2025. These included continuous training and coaching activities for both AST experts and national authorities, including on the identification of vulnerabilities, SOGIESC⁽¹⁵⁾ and topics related to gender-based violence. In parallel, the Agency continued to support national authorities in enhancing their systems for the identification and referral of vulnerabilities at a structural level, at times conditioning its operational support on the implementation of recommended workflows and tools.

When national systems did not sufficiently provide for the proper recording of vulnerability indicators, and following the FRO's observations, the Agency instructed its AST experts in certain country operations to record such indicators through ad hoc arrangements, ensuring their visibility to relevant actors, while simultaneously supporting improvements to national recording systems. In addition, where EUAA case officers identified new vulnerabilities at the stage of the asylum interview, the Agency, in certain country operations, tracked those cases and raised awareness among national authorities to close any potential gaps at earlier stages of the procedure. The Agency promotes active collaboration with national authorities to enhance and streamline early identification of vulnerabilities, with the aim of implementing procedural safeguards, supporting prompt referral of applicants in vulnerable situations, and responding to their special needs at all stages of the asylum procedure. On its own initiative, the Agency also developed and began piloting, in selected EUAA operations, an internal Quality Assurance Tool on Vulnerability, which aims to strengthen quality standards in vulnerability assessment procedures.

In previous observations, the office also identified the need to strengthen the quality of the Agency's interpretation services for persons in vulnerable situations, including ensuring that the specific needs of children are adequately addressed. In response, the Agency reviewed the content of existing training modules for interpreters with a view to complementing and enhancing them when necessary. Furthermore, particular attention was given to this issue during induction sessions for interpreters and targeted coaching activities in order to reinforce awareness and promote appropriate handling of such cases. Where the FRO identified gaps or challenges related to access to essential services, including healthcare, the Agency addressed these issues by raising them with national authorities and supporting enhanced coordination, for example with medical services, with a view to avoiding duplication and improving both the identification of needs and access to services.

¹⁵⁾ Sexual orientation, gender identity and expression and sex characteristics.



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4. The first full phase of operationalisation of the complaints mechanism

In 2025, the office ensured the effective implementation of the complaints mechanism ⁽¹⁶⁾, with a particular focus on accessibility, awareness-raising, capacity-building and stakeholder engagement. The year marked the first full phase of operationalisation of the mechanism following its establishment.

4.1. Accessibility and awareness-raising

Throughout 2025, the office continued its efforts to make the complaints mechanism accessible to all individuals. Informative material developed in 2024, including a [webpage](#), posters and leaflets, was subject to consultation with civil society organisations through the Consultative Forum, focusing on accessibility, design, content and usability.

Feedback received from the Consultative Forum resulted in further improvements to the material. Following its finalisation, the material was translated into seven languages: Arabic, French, Dari, Bengali, Urdu, Ukrainian and Turkish. At the end of 2025, the translations were pending a quality review.

¹⁶⁾ The complaints mechanism is set up in line with Article 51 of the EUAA Regulation and [Management Board Decision No 159](#).



In parallel, the office conducted an exercise to map needs in different operational locations of the Agency across seven countries to ensure that the informative material can be disseminated promptly once finalised.

In addition, in 2025 the Agency published a [video](#) explaining the functioning of the complaints mechanism, which was made publicly available online.

4.2. Capacity-building and training

To further enhance understanding of the complaints mechanism among AST experts and to clarify its distinction from other accountability mechanisms of the Agency, the office worked closely with the Training and Professional Development Centre to revise the existing training module.

As a result, the complaints mechanism module was fully revamped and integrated as a standard component of the Agency's pre-deployment training for AST experts. In addition to explaining the functioning of the mechanism, the module includes practical examples and provides clear distinctions between the complaints mechanism and other internal accountability tools, such as the escalation mechanism and the Code of Conduct applicable to all experts participating in AST.

4.3. Stakeholder engagement and cooperation

Throughout 2025, the office maintained regular exchanges with key stakeholders involved in the functioning of the mechanism.

Internally, the office participated in a thematic exchange with colleagues from the Operational Support Centre. The exchange aimed to better inform the EUAA's country and measure coordinators about the functioning of the Agency's accountability mechanisms, and in particular the complaints mechanism and the role of AST members in this context.



On request, the office also organised dedicated information sessions with asylum and reception authorities from some Member States. The sessions focused on explaining how the mechanism operates, its implications for locations hosting EUAA operations, and the upcoming dissemination of informative material about it.

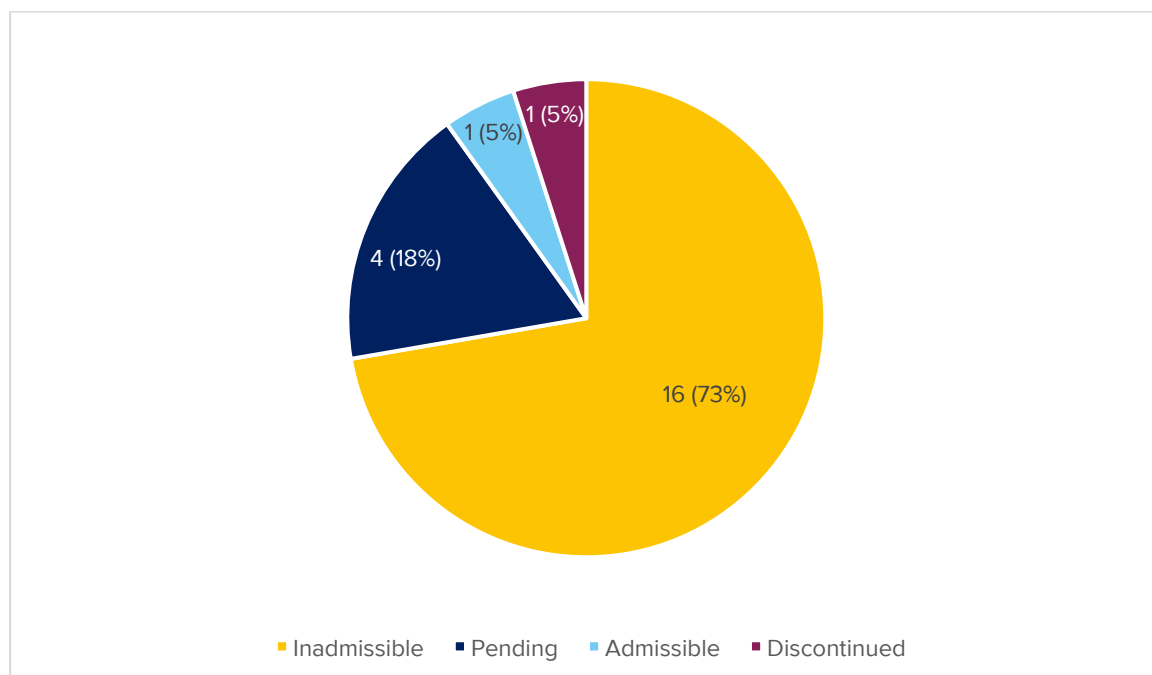
In June 2025, the office organised an information session for representatives of Ombudsperson institutions from 22 EU Member States and associated countries, together with representatives of the European Ombudsman and the EU Agency for Fundamental Rights (FRA). Under the EUAA Regulation, the FRO is mandated to share information with Ombudsperson institutions about both admissible and inadmissible complaints. In this context the session provided an overview of the procedures of the complaints mechanism and clarified the role of Ombudspersons within it. This engagement laid the groundwork for future referrals and cooperation frameworks between the office and ombudsperson institutions across EU Member States and associated countries.

4.4. Handling of complaints in 2025

The FRO received a total of 22 complaints in 2025. This represented an almost four-fold increase compared to 2024, during which 6 complaints were received. This increase coincided with the first full year of implementation of the mechanism and with efforts undertaken to increase its visibility and accessibility, as described above.

Of the complaints received, 16 were deemed inadmissible and one complaint was deemed admissible. Four complaints were pending examination at the end of the year, and the examination of one complaint was discontinued (see *Figure 3*).

Figure 3. Complaints per admissibility status



The complaint which was deemed admissible related to an alleged violation of protection in the event of removal, expulsion or extradition (*non-refoulement*), safeguarded under Article 19(2) of the EU Charter of Fundamental Rights of the European Union, in the context of the EUAA operation in Greece. In line with Article 51 of the EUAA Regulation and the Management Board Decision governing the mechanism ⁽¹⁷⁾, the FRO concluded the admissibility analysis and forwarded the complaint to the Executive Director for an assessment and potential follow-up measures. At the end of 2025, the assessment was pending. In addition, information was shared with the national Ombudsman as foreseen under the applicable rules ⁽¹⁸⁾.

Twelve complaints which were deemed inadmissible concerned the context of the EUAA's operations, in that they related to asylum or reception matters within a country, authority or location covered by an operational plan, but without direct involvement of EUAA staff. One inadmissible complaint was considered to raise serious fundamental rights concerns about potential violations of the prohibition of torture and inhuman or degrading treatment (Article 4, EU Charter of Fundamental Rights) and the right to respect for private and family life (Article 7, EU Charter of Fundamental Rights). In line with Article 7(3) of Management Board Decision No 159, this complaint was shared with the EUAA Executive Director.

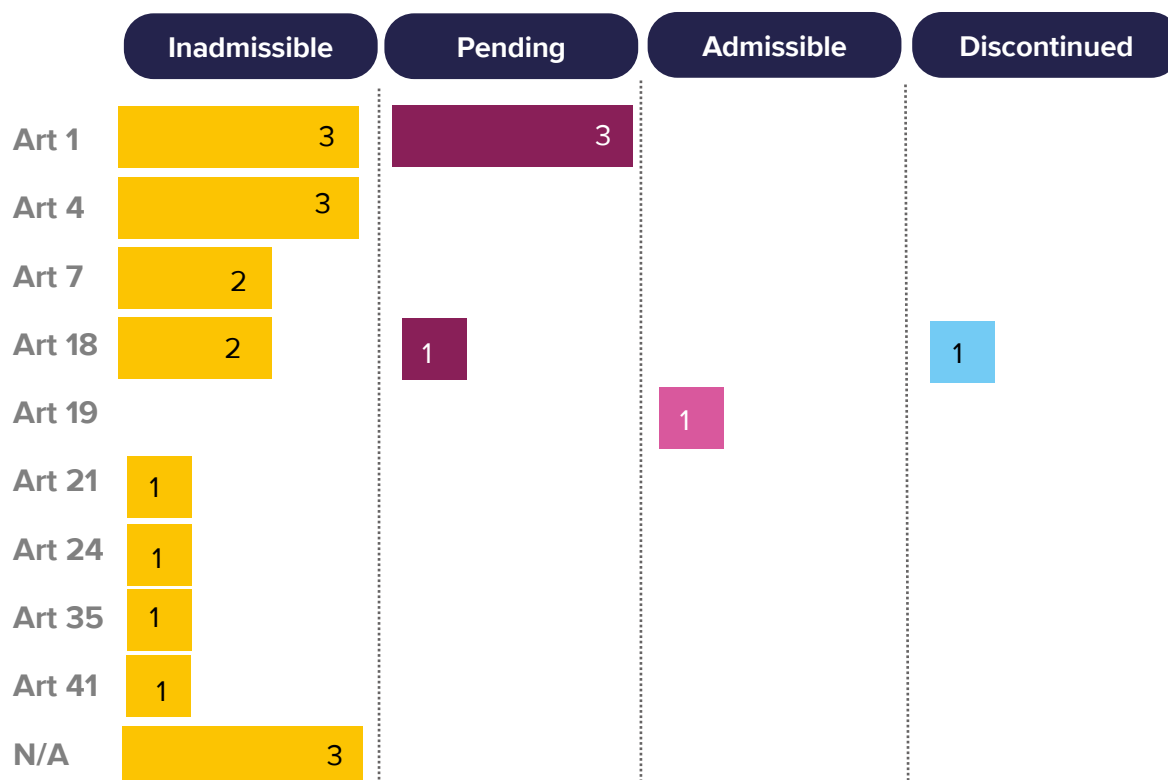
Under the EUAA Regulation and the relevant Management Board Decision, the FRO is mandated, under specific circumstances, to share information on complaints with the relevant authority or competent body responsible for fundamental rights in the Member State. In 2025, information on one inadmissible complaint was shared with the relevant national ombudsperson, while a referral process to the competent national ombudsperson in relation to a second inadmissible complaint was ongoing at the end of the year.

The alleged fundamental rights violations raised in the complaints received in 2025 concerned, most notably, human dignity (Article 1, EU Charter of Fundamental Rights), the right to asylum (Article 18, EU Charter of Fundamental Rights), and the prohibition of torture and inhuman or degrading treatment or punishment (Article 4, EU Charter of Fundamental Rights). In some cases, no specific allegation of a fundamental right violation could be deduced (see *Figure 4*).

¹⁷⁾ Article 8, Management Board Decision No 159 of 24 May 2024 on the setting up of the complaints mechanism, [EUAA/MB/2024/056](#).

¹⁸⁾ Idem.

Figure 4. Number of complaints by the fundamental right which has allegedly been violated and admissibility status



CFR Article	Fundamental right
Art. 1	Human dignity
Art. 4	Prohibition of torture and inhuman or degrading treatment or punishment
Art. 7	Respect for private and family life
Art. 18	Right to asylum
Art. 19	Protection in the event of removal, expulsion or extradition (<i>non-refoulement</i>)
Art. 21	Non-discrimination
Art. 24	The rights of the child
Art. 35	Health care
Art. 41	Right to good administration

5. What's next in 2026?

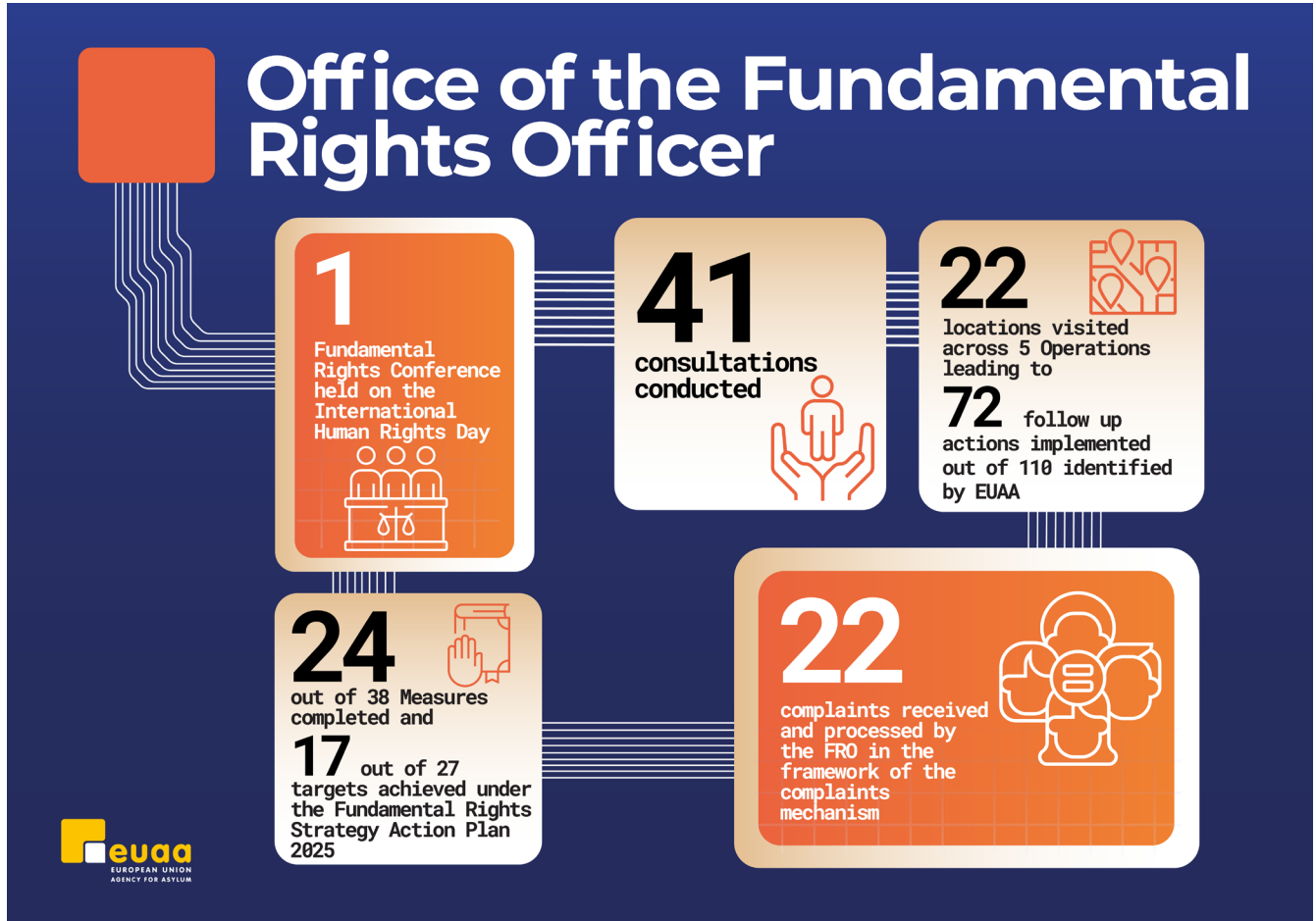
The year ahead will bring important changes as the Pact on Migration and Asylum enters into force in June 2026. The Office of the FRO aims for continuity in its work programme while adapting to the new realities.

The appointment of the fundamental rights focal points has fostered increased cooperation between the Agency and the FRO, while reinforcing key fundamental rights processes in the Agency. Therefore, the Office of the FRO will continue to invest in the functioning and capacity of this network through different activities and events. The office will also provide guidance and support for the next necessary steps in the ongoing implementation of the 2024-2028 Fundamental Rights Strategy.

In close cooperation with members of the Consultative Forum, the Office of the FRO will continue to raise awareness about the EUAA complaints mechanism and ensure effective access to potential complainants, in particular for persons seeking international protection.

In relation to the Pact on Migration and Asylum, the FRO will consolidate findings from operational visits and any mitigating measures that are relevant in the framework of the Pact to discuss them with the EUAA management. Efforts will also be directed to discuss challenges with internal and external stakeholders, while highlighting the safeguards which are embedded in the Pact. The Office of the FRO will provide advice to the Agency on how to best support national authorities in implementing the safeguards so that fundamental rights of persons seeking international protection are fully respected, protected and promoted.

Annex 1. 2025 in numbers





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