

## **ALTERNATIVE REPORT**

**TO THE UNITED NATIONS COMMITTEE ON THE RIGHTS OF THE CHILD**

**for consideration of the combined Third to Fifth Periodic Reports of Slovakia  
under the Convention on the Rights of the Child**

### **THE IMMIGRATION DETENTION OF FAMILIES WITH MINOR CHILDREN AND THE SITUATION OF UNACCOMPANIED MINORS IN SLOVAKIA**

Human Rights League (HRL)  
Forum for Human Rights (FORUM)

15 April 2016

## INTRODUCTION

1. This written submission provides information on several issues of great concern with regard to Slovakia's compliance with the provisions of the Convention on the Rights of the Child (hereinafter "CRC"). We would like to draw the Committee's attention to the practices in immigration detention such as general practice to detain **families with minor children in immigration detention** for prolonged periods in absolutely unsuitable conditions, routine transportation of detained immigrants in handcuffs, lack of interpretation and translation in immigration detention and inadequate health care provided to persons in immigration detention, including to children. In the second part of the submission, we will provide information about **the situation of unaccompanied minors** in Slovakia, including their disappearances from children's home.
2. The submission has been written jointly by two non-governmental organisations, the Human Rights League and the Forum for Human Rights, and is aimed to assist the Committee with its consideration of Slovakia's combined Third to Fifth Periodic Reports about compliance with the Convention on the Rights of the Child.

**Human Rights League (HRL)** is a civic association established in 2005 by lawyers and attorneys dedicated to providing legal assistance to foreigners and refugees in Slovakia with aspiration to support building of transparent and responsible immigration, asylum and integration policies respecting human rights and dignity. The HRL combines provision of direct services - quality and free-of-charge legal aid to migrants and refugees in Slovakia with advocacy and strategic litigation in relation to establishment, development and implementation of immigration, asylum and integration policies in Slovakia. The HRL also strives to contribute to education of new generation of young lawyers knowledgeable and skilled in the area of asylum and immigration law. Human Rights League cooperates with Trnava University Law Faculty facilitating its Asylum Law Clinics.

**Forum for Human Rights (FORUM)** is an international human rights organisation working in the Central European region. It provides support to local NGOs and leads their domestic and international litigation. FORUM has been supporting a number of cases pending before domestic judicial authorities, inter alia on access to justice or on the protection of vulnerable groups against torture and ill-treatment in different settings. FORUM conducts international advocacy before the UN bodies especially in order to promote rights of vulnerable people, and co-authored number of alternative reports, inter alia for the UN Committee on the Rights of Persons with Disabilities, UN Committee on Elimination of Discrimination against Women, the Council of Europe Committee of Social Rights.

## I. IMMIGRATION DETENTION OF FAMILIES WITH CHILDREN

3. **Slovak authorities routinely detain migrant families with minor children in the immigration detention centres which are not accommodated to their needs.** Although minor children cannot be formally detained, children of parents who are in an irregular position can be deprived of liberty together with their parents in the detention centre for several months.<sup>1</sup>
4. **We understand that migrant children shall never be deprived of their liberty on the basis of their irregular status.** Nevertheless, in Slovakia, foreign nationals are placed in a detention by the administrative decision of a foreign police.<sup>2</sup> According to *Law on residence of foreign nationals*, families with children can be detained when strictly necessary for the shortest possible time-period.<sup>3</sup> The law provides that detention should be the measure of last resort and that the police should always consider application of less restrictive measures (alternatives to detention).<sup>4</sup> **Families with children can be detained for up to six months.**<sup>5</sup> In practice, the foreign police **routinely** detain families with children for prolonged periods of several months and the HRL had observed cases when the foreign police set the duration of detention for a family with minor children for five or six months from the very beginning.
5. **The alternatives to detention are rarely used in practice and have never been applied in cases of families with children.** In Slovakia, two alternatives are provided by law – financial guarantee and report of residence.<sup>6</sup> However, the law makes it practically impossible for ordinary persons to benefit from the alternative of reporting the residence. Mainly due to the obligation to have: (i) accommodation, and at the same time, (ii) financial means to cover for every day of stay in the amount of EUR 56 per day<sup>7</sup>. It is worth to mention that minimal monthly life subsistence in Slovakia in 2015 was EUR 198.09 per adult person. However, an adult immigrant, whose detention decision is determined for say 30 days, would have to prove to have at least EUR 1 680 in order to be granted alternative to detention in form of residence reporting. This makes this form of **alternative for detention practically impossible for families with children**, taking into consideration that they would have to (i) find an accommodation and (ii) prove financial means for every family member in the amount stated above. There are no support services or special shelters for migrant families available. Therefore in 2015, migrant families with minor children, who were migrating in irregular situation through Slovakia, had been

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<sup>1</sup> Unlike unaccompanied minors who are placed in the special child home for unaccompanied minors.

<sup>2</sup> Law no. 404/2011 Coll. on residence of foreign nationals, as amended, Section 88 et seq.

<sup>3</sup> *Ibid*, Section 88(9).

<sup>4</sup> *Ibid*, Section 89 (3).

<sup>5</sup> *Ibid*, Section 88(4).

<sup>6</sup> *Ibid*, Section 89 (3).

<sup>7</sup> Decree of the Ministry of Interior of the Slovak Republic no. 499/2011 of 15 December 2011 on determining the amount of funds needed to cover the costs of residence of third country to the territory of the Slovak Republic.

routinely detained until the capacities of both detention centres reached their maximum in August 2015.

6. There are two immigration detention centres in Slovakia, in *Sečovce*<sup>8</sup> and *Medved'ov*<sup>9</sup>. **None of the detention centres is suitable for accommodation of families with children.** Both centres are operated and guarded by the foreign police and have strict **prison-like regime**. The centres are surrounded by barbed wire and all windows are wired. The detained persons, including children, can move freely only within the designated sector and have allowed access to open air only twice a day for one hour under supervision of uniformed police guards.<sup>10</sup> Children with parents are escorted for having a meal twice or three times a day. There is a minimum of civil personal in these centres. The families with children are constantly guarded by uniformed police, even during visit of physician or during one hour walks in the open air. Even the playgrounds in *Sečovce* detention centre are surrounded by wire.
7. During summer of 2015, families with children were detained also in *Medved'ov* detention centre which is intended to detain only adults and has not been presumed to accommodate families with children. With the assistance of the HRL the management of the centre rapidly adjusted one of its sectors for accommodation of families with children and created a room for playing and spending free time for kids. However, the open air area in the *Medved'ov* detention centre remained, among many under things, absolutely unsuitable for children.
8. For children detained for period shorter than three months, law presumes **no access to education**.<sup>11</sup> That means that during the first three months of their detention, children are not educated at all. The leisure activities are secured in cooperation with non-governmental organization Slovak Humanitarian Council. Provision of leisure and free time activities for children is project-based, thus at the time when the number of children and families reached the peak in summer 2015, no NGOs were available to provide for **meaningful activities for children and their parents to spend their time** in detention. In summer 2015 when parents were on strike protesting against their detention and riots broke out in the centre, **heavily armoured special intervention police units were called to intervene on few occasions**.
9. During summer of 2015 the HRL also observed a **lack of material needs** for families with children, in particular clothing and footwear, diapers and baby food. These material needs were only partially covered, often supplemented by individual police officers, medical staff, NGOs or charities.

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<sup>8</sup> *Police Detention Centre in Sečovce* is located in eastern Slovakia, 60 km from the Ukrainian border. It has capacity to detain 176 persons with possibility to increase the capacity to 184 persons.

<sup>9</sup> *Police Detention Centre in Medved'ov* is located in southwest Slovakia, on the border with Hungary. It has capacity to detain 152 persons, with the possibility to increase the capacity by 40 more places.

<sup>10</sup> Law no. 404/2011 Coll. on residence of foreign nationals, as amended, Section 96(1).

<sup>11</sup> Law no. 404/2011 Coll. on residence of foreign nationals, as amended, Section 96(2)(a).

10. The statistics on number of detained families with children are gathered by the Foreign Police Directorate. Upon request for information, police informed the HRL that in 2015 there were **more than 300 children detained** in Slovak detention centres, while 278 of them stayed with their parents in Sečovce, 31 in Medveďov centre. They came from various countries of origin, mostly from **Syria** (144 children), 72 children were from **Kosovo** and 59 from **Iraq**. The statistical data on reasons and length of their detention are, however, not available. Children come from all age categories, including new-born babies, toddlers, up to teenagers. While Medveďov detention centre provided detailed statistics on age groups of children, Sečovce detention centre which should be specifically designed to accommodate families with children replied that they do not follow statistically the age categories of children, since it is not necessary for fulfilment of their duties as a detention centre. In first months of 2016 situation was not so dramatic when it comes to numbers of detained children. However, no apparent measures were adopted in order to prevent the situation from 2015 from happening again, provided that influx of families with children will transit irregularly through Slovakia as was the case in 2015.
11. Upon a placement in detention facility, their mobile phones were confiscated and they could use the telephone machines on coins only. The access to internet is not provided, unless in specific cases, however, even then privacy of detainees is not respected. The law provides that when released, detained persons have to **pay the costs of their detention**, particularly the food that had been provided.<sup>12</sup>
12. The services in the detention centres, such as social work, regular visits of psychologist, etc. have been provided only by NGOs based on EU funded project. These services were not available when such projects were not implemented. Since July 2015 until November 2015 no such projects were implemented and were not replaced by any other State-funded schemes. At the same time, in relation to refugee crisis, the numbers of detainees have risen extraordinary, but **no social services**, crisis interventions, psychologists, cultural mediators and regular access to interpretation have been secured. Since January 2016 Slovak Humanitarian Council implements EU funded project for 12 months, however, it is temporary solution without sustainability of funding for the necessary services.
13. The law provides that health care for detainees is covered by public health insurance provided by the State, but detainees need to pay for certain medical interventions and medication as any other participant in the public health insurance system.<sup>13</sup> The **medical care** is provided by presence of nurse every working day and regular visits by doctor to the detention centre. However, communication problems were reported frequently as the medical personnel does not speak English and interpreters and/or cultural mediators are rarely called by the centres to interpret during medical check-ups. Several families complained about insufficient medical treatment, lack of direct communication with medical personnel and related insufficient understanding of diagnosis and of provided treatment. Moreover, there

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<sup>12</sup> Law no. 404/2011 Coll. on residence of foreign nationals, as amended, Section 91(3).

<sup>13</sup> Law no. 499/2011 Coll. on health insurance as amended, Section 3(3)(f)

is **no psychologist** or any other relief services in neither of the detention centres unless provided by NGOs through project funds. There is only one social worker employed by Sečovce detention centre and one by Medveďov detention centre who shall secure communication with all the detained persons. In many cases the HRL observed serious deterioration of psychological state of parents as well as children resulting from their detention.

14. Another issue of concern is practice of **systematic handcuffing** of migrants who are detained. We observed that almost every migrant who is detained is subjected to handcuffs and even special belt when transported, including women and parents of minor children. Handcuffs are routinely ordered and not used only exceptionally.

#### **INTERNATIONAL STANDARDS WITH REGARD TO DETENTION OF FAMILIES WITH CHILDREN**

15. **We understand that detention of children with their families who are in irregular position raises very serious human rights issues under several provisions of the CRC.** By detaining migrants families with minor children under conditions as we have described above, the Slovak Republic does not meet obligations stipulated especially in the following provisions of the CRC: **Article 3** (best interest of children), **Article 2** (non-discrimination principle), **Article 37(a)** (prohibition of torture or other cruel, inhuman or degrading treatment or punishment), **Article 37(b)** (right to liberty), **Article 37(c)** (right to dignity when deprived of liberty), **Article 37(d)** (guarantees in detention), **Article 22** (protection of refugee children), **Article 24** (right to health), **Article 28** (right to education), **Article 31** (right to rest and leisure), **Article 39** (right to reintegration of child victims of armed conflicts).

16. The Committee in its 2012 report “The Rights of All Children in the Context of International Migration” clearly noted that “immigration detention and it being a **clear violation of the Convention** was a subject that was repeatedly discussed and underscored.”<sup>14</sup> It emphasised that “regardless of the situation, detention of children on the sole basis of their migration status or that of their parents is a **violation of children rights, is never in their best interests and is not justifiable**”.<sup>15</sup>

17. The detention of migrant children with parents in irregular position was recently fiercely criticised by Mr. Juan Mendez, the UN Special Rapporteur on torture and other cruel, inhuman or degrading treatment or punishment. In his latest report of 5 March 2015, he noted that “within the context of administrative immigration enforcement, it is now clear that the deprivation of liberty of children based on their or their parents’ migration status is **never in the best interests of the child, exceeds the requirement of necessity, becomes grossly disproportionate and may constitute cruel, inhuman or degrading treatment of migrant children**”.<sup>16</sup> He

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<sup>14</sup> UN Committee on the Rights of the Child, report of 2012 Day of General Discussion of 28 September 2012, “The Rights of All Children in the Context of International Migration”, § 32.

<sup>15</sup> *Ibid*, § 32.

<sup>16</sup> Report of the Special Rapporteur on torture and other cruel, inhuman or degrading treatment or punishment, Juan E. Méndez, 5 March 2015, A/HRC/28/68, § 80.

further explained “that the principle of *ultima ratio* that applies to juvenile criminal justice is not applicable to immigration proceedings. The deprivation of liberty of children based exclusively on immigration-related reasons exceeds the requirement of necessity because the measure is not absolutely essential to ensure the appearance of children at immigration proceedings or to implement a deportation order. Deprivation of liberty in this context can never be construed as a measure that complies with the child’s best interests.”<sup>17</sup>

18. The **UN Special Rapporteur on the human rights of migrants** in his 2013 regional study on detention practices in EU noted that “in fact, the Return Directive stipulates that detention should be a measure of last resort. Yet, in practice, few viable alternatives to detention appear to be explored by the European Union institutionally and by European Union Member States individually. In the countries visited the Special Rapporteur witnessed an al-most complete absence of readily implementable wide-scale alternatives to detention, including for children.”<sup>18</sup> He recommended “promoting viable alternatives to detention and not insisting on further entrenching detention as a migration control mechanism through support for expanded networks of detention centres. Detention should always be a measure of last resort, and **children should never be detained.**”<sup>19</sup>
19. The view that immigration detention of families with children may constitute an inhuman and degrading treatment was also repeatedly adjudicated by the European Court of Human Rights. The European Court found a violation of Article 3 of the European Convention on Human Rights (prohibition of torture, inhuman and degrading treatment) with respect of children in number of cases, including *Muskhadzhiyeva and Others v Belgium* (detention of a mother with four children in age of 7 months, 3, 5 and 7 years for one month), *Kanagaratnam and Others v Belgium* (detention of a mother with three children in age of 8, 11 and 13 years for almost four months) and *Popov v France* (detention of children in the age of 5 months and 3 years together with parents for 15 days).<sup>20</sup>
20. The **Inter-American Court of Human Rights** discussed this issue quite recently in its 2014 advisory opinion. The Court recalled standards established especially by the UN Committee on the Rights of the Child and UN Special Rapporteur on the human rights of migrants and stated that in immigration context, the Court emphasised that “States **may not resort to the deprivation of liberty of children who are with their parents**, or those who are unaccompanied or separated from their parents, **as a precautionary measure in immigration proceedings**; nor may States base this measure on failure to comply with the requirements to enter and to remain in a

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<sup>17</sup> *Ibidem*.

<sup>18</sup> Report of the Special Rapporteur on the human rights of migrants, François Crépeau, Regional study: management of the external borders of the European Union and its impact on the human rights of migrants, 24 April 2013, A/HRC/23/46, § 48.

<sup>19</sup> *Ibid*, § 92.

<sup>20</sup> *Muskhadzhiyeva and Others v Belgium*, application no. 41442/07, judgment of 19. 1. 2010; *Kanagaratnam and Others v Belgium*, application no. 15297/09, judgment of 13. 12. 2011; *Popov v France*, applications no. 39472/07 and 39474/07, judgment of 19. 1. 2012.

country, on the fact that the child is alone or separated from her or his family, or on the objective of ensuring family unity, because States can and should have other less harmful alternatives and, at the same time, protect the rights of the child integrally and as a priority.”<sup>21</sup>

21. To sum it up, the international standards with regard to the immigration detention of families with children is moving from its initial *ultima ratio* approach towards an **absolute ban of immigration detention of children** as this is never in the best interest of a child and constitutes inhuman and degrading treatment. We therefore kindly ask the Committee to vigorously review practice of the Slovak Republic with regard to migrant families with minor children and issue the following recommendations:

- ❖ **The Committee urges the State Party to immediately stop placing families with children in the immigration detention and to amend legislation in order to prohibit immigration detention of families with children.**
- ❖ **The Committee urges the State Party to create and actively use alternatives to detention suitable for families with children and provide appropriate services, including suitable alternative accommodation, medical, social and psychological services to ensure the best care of migrant children.**
- ❖ **The Committee recommends to the State Party to gather and publish statistics on the number of families with minor children apprehended by immigration authorities, their age, country of origin, the ground for their apprehension/detention and the length of the detention and regularly evaluate these statistics as well as situation of children.**

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<sup>21</sup>IACHR, Advisory opinion no. OC-21/14 of August 19, 2014 requested by the Argentine Republic, the Federative Republic of Brazil, the Republic of Paraguay and the Oriental Republic of Uruguay on Rights and Guarantees of Children in the Context of Migration and/or in Need of International Protection

## II. SITUATION OF UNACCOMPANIED CHILDREN IN SLOVAKIA

22. We would like to draw the Committee's attention also to the problem of **disappearances of unaccompanied minors from child care facilities**. In 2014 some 20 and in 2015 some 23 unaccompanied minors were detected and placed in child care facilities, all of whom subsequently absconded; three of these minors were later found in the immediate vicinity of the children's home in Medzilaborce. These numbers were considerably higher in the preceding years, 110 unaccompanied minors absconded from childcare facilities in 2011, 135 in 2012, and 35 in 2013.

23. The Human Rights League realized a project on "missing children". From September 2013 to September 2014 we conducted one year desk and field research, and our findings and recommendations are published in the Position Paper and Background Analysis on Missing Children in Slovakia (published in Slovak language in October 2014).<sup>22</sup> Main findings and recommendations in relation to disappearances of separated children can be summarised as follows:

- Adoption of preventive measures (there are still no prevention measures at the moment in place). The government policy document - the Integration Policy of the Slovak Republic – says the reasons for disappearances should be analysed and preventive measures should be adopted.
- The creation of the inter-ministerial working group that would elaborate the proposals of the preventive measures.
- Improve the collection and analysis of the data on disappearances (there is no reliable data on disappeared separated children)
- Improve the system of searching for disappeared separated children (currently there is only local search, no national or international search is going on).
- Insert the data on disappeared separated children into national police database used for searching for persons – PATROS (unlike Slovak children, data on missing separated children are not inserted into this database, therefore no national search is going on).
- Insert the data on missing separated children into Schengen Information System in order to facilitate international search (data are not being inserted to SIS II at the moment so if a child found in another EU state Slovakia does not have feedback and this state does not know this child was in Slovakia before).
- Initiate criminal investigation in case where there are indications that the crime (trafficking, smuggling or other) has been committed in relation to the missing separated child (no single separated child has been identified as a victim or potential victim of trafficking in Slovakia, although almost all of these children disappear and their whereabouts are unknown).
- Improve cooperation among responsible Slovak authorities, mainly police and child welfare authorities (the cooperation is almost non-existent at the moment).

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<sup>22</sup> Human Rights League, Miznúce deti, Bratislava, October, 2014. See also, Human Rights League, Durable Solutions for Separated Children in Europe, National Report: Slovakia, May 2015.

24. We identified problems in relation to the appointment of guardians to separated children. Some courts do appoint the guardian in the same decision, by which they place the child in the children home, whilst other courts do issue the decision on the placement, however not the decision on the appointment of the guardian. In such cases, after the placement of the child into the children home, the local Office of Labour, Social Affairs and Family (acting as a welfare authority) has to submit the request to the local court for the appointment of the guardian. It takes days or weeks for the court to appoint the guardian. This practice is problematic, because the child does not have a legal representative and cannot by an example submit asylum application. Also, age verification procedures are always conducted **in the absence of the guardian, due to the “presumption of majority”**, which is applied in cases of disputed age.
25. Another identified problem is **legal representation of unaccompanied minors in the asylum procedure** at the first instance, it means before the Migration Office of the Ministry of Interior of the Slovak Republic. In accordance with § 29 (4) of the Act No. 305/2005 Coll. on the Social and Legal Protection of Children, responsible body of social and legal protection of children is obliged to a) provide to unaccompanied child legal counselling **based on the child’s request**, and b) provides legal help to the child based on the § 24a of the Act No. 327/2005 Coll. on the Provision of Legal Help to the People in Material Need. These provisions do give some guarantee to the unaccompanied child in order to access legal help, however, two main problems do appear in practice: 1) the child needs to request the legal counselling, otherwise the responsible authority is not obliged to provide it, and 2) legal help based on the above mentioned provision of the Act on the Provision of Legal Help to the People in Material Need guarantees legal representation only in front of the court (not at the first instance at the Migration Office) and it is provided by state institution - Centre for Legal Aid, which is the institution established by law to provide wide range of services to people in Slovakia, who can prove they are in material need. From our experience it often happens that **unaccompanied minor is represented at the first instance asylum procedure** (in front of the Migration Office) **only by his/her guardian** appointed by a court - the guardian is always local Office of Labour, Social Affairs and Family, who delegates the **social worker** to represent the child. Therefore, **legal representation by a legal practitioner (asylum lawyer or attorney) is often not provided** and it depends on the discretion of the appointed guardian whether he/she decides to appoint a lawyer to the first instance asylum procedure or not. It should be mentioned that there are experienced asylum lawyers working for NGOs as well as attorneys who would be willing to represent unaccompanied minors in asylum procedure for free, however, guardians are reluctant to appoint them.
26. Another point of concern is the method of age assessment. Pursuant to Article 111(6) of the Act No. 404/2011 Coll. on Residence of Foreigners, a foreigner who claims to be an unaccompanied minor must undergo a **medical examination** to determine his/her age, unless it is obvious that the person is a child. Article 127 of the Act on Residence of Foreigners states that if a person refuses to undergo a medical examination, he/she shall be considered to be an adult for the purposes of the proceedings under this Act, and if he/she agrees to the medical examination,

**he/she shall be considered to be an adult until the results of the examination prove the contrary.** This “presumption of majority” we do see as very problematic, because it means that a foreigner claiming to be minor, whose age is disputed, is considered adult during age assessment examination, and no guardian is appointed to him/her. Also, **there are no procedural guarantees**, because the police based on the medical report of the radiologist considers the person to be adult **without issuing any decision, which could be appealed** by the foreigner. However, such a decision can have very serious consequences, such as administrative deportation and even detention.

27. The method used for age assessment is the **ossification test** (wrist X-Ray), which may also be complemented by dental analysis. This method of age assessment does not take into account psychological, cognitive or behavioural factors. In the course of 2011 one NGO successfully challenged several decisions to move presumed children from children’s homes to the temporary detention facility for adults with a view to their subsequent deportation on the grounds that they were adults, based on the ossification test. Apart from procedural irregularities, the Trnava District Court, which considered these cases, noted that the participation of an anthropologist in the age assessment examination would yield the outcome of the age assessment more credible. We strongly recommend the Slovak authorities to review the age assessment procedures, ensuring that the best interests of the child are effectively protected, and taking into account the Convention on the Rights of the Child and General Comment No. 6 of the Committee on the Rights of the Child.

28. In the light of the foregoing information we invite the Committee to issue the following recommendations:

❖ **The Committee urges the State Party to adopt effective measures to prevent disappearance of unaccompanied migrant children from children’s homes, including**

- **substantial improvement of communication with children from their first contact with authorities;**
- **prompt appointment of a guardian, who shall ensure that best interest of the child is adhered to;**
- **training of all personal working with unaccompanied minors on children’s rights, procedures and communication with unaccompanied children,**
- **gather statistics on number of children, who disappeared from children’s homes;**
- **adoption of durable solutions for unaccompanied minors with regard to their further residence on the territory and integration possibilities, and**
- **to improve the identification of victims and potential victims of trafficking among separated children.**

- ❖ **The Committee recommends the State Party to substantially improve the system of search efforts to find the unaccompanied migrant children, including the national and international search efforts. Furthermore, the Committee recommends to initiate criminal investigation if there is indication that a crime was committed in relation to the missing child.**
- ❖ **The Committee strongly recommends the Slovak authorities to review the age assessment procedures, ensuring that the best interests of the child are effectively protected, mainly the Committee strongly recommends not to apply the principle of “presumption of majority” in cases of disputed age, to appoint a guardian in age assessment procedures, and to guarantee all procedural safeguards, including proper decision with possibility to appeal.**
- ❖ **The Committee advises to guarantee legal representation of unaccompanied asylum seeking children already at the first instance.**

Thank you for your attention to these written submissions. If you would like any further information, please contact:

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