



European Network of
National Human Rights Institutions

Guidance

Monitoring human rights of migrants at the borders

Building on the mandate and
functions of National Human Rights
Institutions



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Monitoring human rights of migrants at the borders

National Human Rights Institutions (NHRIs) have contributed to a growing body of evidence indicating widespread violations of migrants' human rights at the borders in Europe, in line with the concerns raised by civil society organisations and international and regional human rights bodies. As human rights defenders, NHRIs have used their unique mandate and range of functions to address these human rights concerns, as demonstrated in ENNHRI's [report](#) on "Protecting human rights of migrants at the borders: evidence and work of European NHRIs".

Human rights monitoring is a crucial task of NHRIs, through which they observe, gather, verify and use information to address the human rights situation of migrants at the borders. Monitoring can take many forms, including NHRIs going to the borders and collecting data, visits to reception/detention centres and police facilities, including temporary accommodation facilities, open dialogue with migrants, accessing official documents and reviewing legislation.

Comprehensive monitoring is a precondition of impactful advocacy. It is only based on updated, relevant information that NHRIs can make effective use of their special standing at the national and international levels to advocate for policies and legislations that fully respect migrants' rights.

Despite the evidence from human rights defenders, some governments still deny or insufficiently recognise the existence of human rights violations at the borders.

With this proposed guidance, ENNHRI aims at building on its members' monitoring experience to collect information on key topics with the goal to achieve better protection of migrants' human rights at the borders. A common guidance also allows NHRIs to discuss findings, identify common human rights challenges and share good practices when monitoring borders. It is also intended to enhance NHRIs' capacity to put recommendations before national authorities with the view to influence worrying practices.

Through the collection of information based on common guiding questions, European NHRIs can also identify human rights issues that need to be addressed not only at the national but also regional levels. The use of the common guidance by NHRIs, and the findings that will follow, will be the primary source for ENNHRI's recommendations to actors at the European Union (EU) and Council of Europe (CoE) levels.

Glossary

To ensure that information is comparable and understood, it is important that NHRIs use common terminology when monitoring borders and reporting on their findings. The short descriptions of terms below follow widely accepted definitions and international standards. Where relevant, NHRIs will also use terminology in accordance with national law, but will seek to use uniform, internationally recognised terms when reporting on the findings.

Asylum seeker: Any person who is seeking international protection but whose claim has not been determined yet. It includes those who expressed their wish to apply for asylum but have not yet formally lodge their application.

Borders: A boundary separating areas between political entities where border governance is exercised. Such areas include border crossing points (airports, ports, land), transit zones, land borders not recognised as crossing points, etc.¹

Border governance: A framework of legal instruments, policies and practices that regulates the entry, exit and treatment of persons at the borders. It includes border security, detention, return, identification, inter-state cooperation, among others.²

Collective expulsion: Any measure forcing a group of migrants to leave a country, without a prior reasonable, objective and individual assessment.³

Expulsion: A formal act or conduct attributable to a state authority compelling a migrant to leave the territory of that state, when this measure is not voluntary or spontaneous.⁴

Human Rights Defenders: Individuals or organisations who, individually and/or in association with others, act to promote and protect human rights at the national and international level.⁵ NHRIs are also recognised as human rights defenders.⁶

Human Rights Accountability at borders: The existence of effective and independent frameworks for the monitoring, investigation and redress of human rights violations at borders. It is an element of the respect for the rule of law.

Immigration detention: The practice of holding people in custody for the purposes of border and migration governance (detention, imprisonment, custodial measure, etc.) – it may be *de jure* (prescribed by law) or *de facto* (in practice, even if not prescribed by law).

Migrant: Umbrella term referring to a person who has moved from their country of origin or place of habitual residence, temporary or permanently, for a variety of reasons.⁷

Migrants in a vulnerable situation: Migrants who, for inherent or situational factors, are unable to fully enjoy their human rights and, for this reason, are entitled to call on a heightened duty of care.⁸

Pushback: Any conduct attributable to state authorities forcing migrants back over a border – generally immediately after they crossed it – without any individual assessment and the possibility to apply for international protection.⁹

Refugee: A person who, owing to a well-founded fear of persecution for reasons of race, religion, nationality, membership of a particular social group or political opinion, is outside the country of nationality and is unable or, owing to such fear, is unwilling to avail himself of the protection of that country; or who, not having a nationality and being outside the country of his former habitual residence as a result of such events, is unable or, owing to such fear, is unwilling to return to it.¹⁰

Return: Umbrella term that refers to broad range of forms and processes to return migrants to their country of origin, transit or a third country. The term per se does not determine any level of voluntariness nor lawfulness. Among others, return include pushbacks, removal, expulsion, deportation, extradition or any other form of return under bilateral arrangements.¹¹

¹ Adapted from OHCHR, [Recommended Principles and Guidelines](#) on Human Rights at International Borders, 2014, p. 4. Where relevant, references can also be made to the external borders of the European Union and the applicable legal frameworks.

² Idem, p. 5.

³ The prohibition of collective expulsions is embodied in different international human rights law provisions, such as [Article 4 of Protocol No. 4](#) to the European Convention on Human Rights. The term should be read in light of the [jurisprudence](#) of the European Court of Human Rights.

⁴ Adapted from International Organization for Migration (IOM), [Key Migration Terms](#).

⁵ Declaration on the Right and Responsibility of Individuals, Groups and Organs of Society to Promote and Protect Universally Recognized Human Rights and Fundamental Freedoms, [A/RES/53/144](#), adopted by the UN General Assembly resolution 53/144 of 9 December 1998.

⁶ Report of the UN Special Rapporteur on the situation of human rights defenders, [A/HRC/22/47](#); ENNHRI, [National Human Rights Institutions and Human Rights Defenders: enabling human rights and democratic space in Europe](#), 2018; Council of Europe Recommendation on the need to strengthen the protection and promotion of civil society space in Europe, [CM/Rec\(2018\)11](#).

⁷ Adapted from International Organization for Migration (IOM), [Key Migration Terms](#).

⁸ Ibidem.

⁹ While this term is not defined under international law, it has been used with a close meaning to ‘collective expulsions’ and sometimes to refer to summary, often violent, returns at the borders. See, for instance, the Report by the Parliamentary Assembly of the Council of Europe, Pushback policies and practice in Council of Europe member States. See also: European Center for Constitutional and Human Rights (ECCHR), [Glossary of Terms: Pushback](#).

¹⁰ Adapted from International Organization for Migration (IOM), [Key Migration Terms](#).

¹¹ Adapted from OHCHR, [Recommended Principles and Guidelines](#) on Human Rights at International Borders, 2014, p. 16.

Guiding Principles

Prior to establishing main areas of concern and their related guiding questions, European NHRIs have also identified a set of principles to guide the development and use of the guidance.

P1: Focus on added value of NHRIs

A primary consideration for the guidance is building on the specificity of NHRIs' mandate and their added-value to the existing monitoring and reporting of border governance and violations at the borders. This can include, depending on the national context, NHRIs' privileged access to official documents related to their borders and their ability to receive and handle individual complaints from migrants. Those NHRIs which are designated as National Protection Mechanisms (NPM) can also take advantage of this additional mandate to conduct unannounced monitoring visits to reception centres and place of deprivation of liberty, such as migrants' detention centres or police stations, and report on their findings.

Due to their special standing, NHRIs are also credible sources of information and constructive interlocutors for both the government and civil society organisations on ensuring human rights-compliant legislation, policy and practices at the borders.

P2: Cooperation with other human rights defenders

Both NHRIs and civil society organisations working on this topic benefit from strong cooperation before, during and after the monitoring of borders. For instance, this allows NHRIs to identify the main gaps in evidence at borders and to build their actions around existing information, thus avoiding duplication. NHRI engagement with civil society organisations that have permanent presence at the borders, access to remote areas and good interaction with migrants can be particularly valuable. Where relevant, cooperation with other independent State bodies, such as those supervising the work of the police, can also be integrated to the monitoring.

P3: Monitoring for change

The monitoring exercise and collection of data should be contextualised and, to the best extent possible, connected to ongoing national and regional developments concerning migration and border management. Relevant information and findings should inform the position of ENNHRI and NHRIs on specific issues, allowing a fact-based response to

strategic advocacy objectives. In this sense, NHRIs' engagement with civil society organisations can significantly amplify advocacy strategies.

P4: Safeguarding privacy

Audio-visual tools have become powerful means to convey messages and document human rights violations but may raise privacy concerns. While making use of audio-visual material such as audio, photographs and videos, NHRIs should pay due regard to the right to privacy of individuals concerned. Monitors should ensure that they obtain an informed consent from individuals and that the intended use of the any audio-visual tool has been clearly discussed.

P5: Communicating findings

Communicating strategically is essential to give the violation of migrants' rights sufficient visibility and to ensure that NHRIs' findings reach a broader public. Existing guidance on how to effectively communicate human rights offers valuable input for NHRIs ([FRA keys](#), [ICPA toolkit](#), among others). When collecting and analysing data, NHRIs can rely on such tools to effectively communicate their findings to different target audiences, such as national authorities and the general public.

Main areas of concern

To facilitate the development of a common guidance, European NHRIs have identified 4 main areas of human rights concerns:

- Returns and violence at the borders;
- Access to relevant procedures at the borders;
- Reception conditions and deprivation of liberty at the borders;
- Human rights accountability at the borders.

These clusters were singled out by European NHRIs in view of the relevance of further data, the added-value that information collected by NHRIs can bring to existing discussion in the field of migration, and upcoming regional developments that have the potential to impact the protection of migrants' human rights at the borders.

The guidance proposed herein builds on these 4 clusters and puts forward a set of guiding questions under each of them. The clusters are deliberately broad so they can cover different national realities. In turn, questions will be more specific and aimed at collecting information on topical human rights issues.

Guiding questions and sources

The guidance is rooted on the rights of migrants under international law, including human rights law, international refugee law, international humanitarian law, as well as relevant domestic law. These rights are scattered throughout different sources at the international and regional level, such as the 1951 Refugee Convention and its 1967 Protocol, the nine core international human rights treaties, and the European Convention on Human Rights. Where it applies, EU law also prescribes States' obligations and recognises the rights of migrants at the borders, with the EU Charter of Fundamental Rights taking a central role.

In order to assist States in translating this myriad of human rights sources into compliant legislation, policies and practices at the borders, international organisations and NGOs published and developed indicators and guidelines for monitoring the respect for migrants' rights. For instance, OHCHR's "[Recommended Principles and Guidelines on Human Rights at International Borders](#)" assist States in practical ways to ensure border governance rooted on human rights, while ECRE's [Asylum and Information Database \(AIDA\)](#) have developed a guidance for collecting relevant data on human rights protection on asylum, which also encompasses situations affecting migrants at the borders. Finally, the OHCHR developed a [guide](#) to measure the implementation of human rights through the use of effective human rights indicators.

A review of legal sources of human rights of migrants and corresponding State obligations at borders extrapolates the scope of this guidance. However, they are the reference point for the development of guiding questions and NHRIs' monitoring exercise. Also relevant are the UN Paris Principles, which provide the international benchmarks for the effective and independent monitoring of NHRIs.

Quantitative and qualitative data

Both qualitative and quantitative data are valuable when monitoring migrants' rights at the borders and will be reflected in this guidance. Quantitative data can include, for instance, the number of migrants being illegally "pushed back" or how many complaints an NHRI has received in relation to violations at the borders. Qualitative data can rely on NHRIs' legal analysis, testimonies from migrants, own-initiative investigations, medical examinations, and other sources.

The guiding questions proposed in this guidance give space for NHRIs to provide both quantitative and qualitative data, where relevant and depending on their specific functions.

The monitoring period might vary from institution to institution depending on their resources, capacity, as well as external factors (cooperation from national authorities, developments at borders, etc).

Analysis of follow-up to previous recommendations

In addition to specific questions on key human rights issues, NHRIs will provide their views on whether their findings relate to any of the NHRIs' previous recommendations to national authorities. They will also evaluate if and how authorities have considered and followed-up on the NHRI input, and if the findings are overall in line with existing information from other human rights defenders. With this approach, the guidance will link NHRIs' monitoring with their protection and promotional [functions](#).

The following questions will be asked in reference to the 4 clusters:

- *Has your NHRI submitted previous recommendations related to this guiding question?*
- *Were these recommendations addressed in public (online reports, seminars, open hearings at the Parliament, etc.) and/or in private (closed door meetings with ministries, non-disclosed reports to national authorities, etc.)?*
- *Have the relevant authorities reacted in accordance with your NHRI recommendations? How would you assess authorities' response?*
- *Are your findings overall in line with the findings from other human rights defenders (NGOs, international and regional human rights actors, etc.)?*

Limitations of the guidance

It is accepted that the proposed guidance has limitations, both due to its scope and external challenges in collecting the data.

- It is recognised that the guidance may not exhaustively cover the human rights situation at borders and, due to fast changes on border governance and migration flows, may not fully reflect the situation at the time of reporting;
- Despite their strong national mandate, some NHRIs may face obstacles when using the guidance to collect data, for instance due to lack of cooperation from national authorities or obstructions of access to facilities at the border.
- Due to limited financial and human capacity from NHRIs, there may be bottlenecks in data collection and NHRIs may have to rely on secondary sources or previously collected information.

Despite these limitations, the guidance reflects the human rights priorities at the borders as identified by European NHRIs and key stakeholders. In addition, ENNHRI supports its members in ensuring they can continue to carry out their mandate in an effective and independent manner when monitoring borders.

Next steps: NHRI's monitoring of borders

This guidance is developed to ensure a flexible use and broad applicability for future monitoring exercises and activities of NHRIs. It can also be a source of inspiration and reference for the work of civil society organisations, regional and international human rights bodies, and others monitoring, reporting and submitting recommendations regarding the borders.

In 2020, European NHRIs will use this guidance to collect information about the state of migrants' human rights at the borders. They will submit reports with findings and recommendations to relevant authorities. These reports will be public and will be disseminated nationally and regionally with the support of ENNHRI. A regional comparative report will be published by ENNHRI, focused on recommendations to regional authorities, such as at the European Union and Council of Europe. The main findings and recommendations will be discussed during ENNHRI's high-level annual conference in November 2020.

Following this period, this guidance and its use can feed into proposals for collective work of NHRIs in the future, in cooperation with other human rights defenders.

Guidance Overview

Returns and violence at the borders

- Returns at the border;
- Violence by State authorities at borders.

Access to relevant procedures at the borders

- Access to asylum procedures;
- Effective, fair and transparent asylum procedures;
- Access to other procedures;

Reception conditions and deprivation of liberty at the borders

- Deprivation of liberty and *de facto* detention at the borders;
- Living conditions in reception centres and makeshift camps at borders.

Human rights accountability at the borders

- A system for human rights accountability at the borders;
- NHRIs' mandate and work at the borders as human rights defenders;
- Enabling environment for work of other human rights defenders at the borders (NGOs, civil society, etc).

Cluster 1: Returns and violence at the borders

Returns

- ✓ Has your NHRI found evidence of pushback, collective expulsion or any unlawful practice of return at the border? Are there reports, including from NGOs or media, or litigation being pursued on this? In case you have this mandate, have your NHRI received individual complaints about expulsions at the border? Does your NHRI exchange any information with other NHRIs or CSOs based in countries where migrants are sent back?
- ✓ Are “refusal of entry” decisions substantiated, or were there cases where they were carried out in the absence of due process guarantees including individual assessment and procedural safeguards? Do they state the reasons for which entry is refused? Is there evidence of misrepresentation of an applicant’s intention or information provided by him/her which led to the refusal of entry?
- ✓ Are applicants able to appeal a refusal of entry decision and is there automatic suspensive effect during the appeal process?

Violence by state authorities at borders

- ✓ Has your NHRI received individual complaints about violence by state authorities at borders (e.g. migrants crossing or having just crossed the borders) or is there evidence of violence in NGO, media reports or via testimonies? Please consider if use of force at borders is necessary and proportionate, in addition to being prescribed by law.
- ✓ Are there cases of effective investigation, by relevant authorities (not the NHRI), to follow-up on complaints of violence suffered from migrants at borders by state authorities? Was there an appropriate redress and mitigation response?

Cluster 2: Access to relevant procedures at the borders

Access to asylum procedures

- ✓ Has your NHRI found cases of denial of access to asylum procedures at the border? Otherwise, is the NHRI aware through individual complaints, reports in media, by NGOs or current litigation efforts of such cases?
- ✓ What is the estimation of how many people have been rejected access to the asylum procedure despite wishing to do so? How many applications for asylum have been recorded in the monitoring period?
- ✓ Is information being provided on how to access asylum at the border (e.g. at border crossing points, reception / detention facilities, land borders? Is the information accessible to potential applicants (any issues or good practices about how is information provided, by whom, in which language etc)?
- ✓ What is considered as an indication that a person wants to seek asylum? Who is in charge to make an assessment on this at the border? Is this authority trained to make this assessment and has sufficient knowledge of human rights and asylum law? Does your NHRI participate in the training of such officials?

Effective, fair and transparent asylum procedures

- ✓ Is there a functioning referral mechanism in place for asylum applications made at the border or is the substance of an application assessed at the border?
- ✓ How long does it take to get an asylum application registered from the moment the potential applicant has expressed the will to apply for asylum? Has your NHRI recorded any administrative or practical barriers of access to the asylum procedures at the borders, such as lack of interpreters, legal assistance, shortage of staff, detention of the applicant etc?
- ✓ Are there any rejection of asylum claims at borders due to inadmissibility? How many out of the total negative decisions are based on inadmissibility grounds? Does national law provide for a legal recourse with or without automatic suspensive effect against rejections of asylum claims as inadmissible? Are there any complaints regarding summary deportation procedures of rejected asylum applicants?

Access to relevant procedures other than asylum

- ✓ Is there a system in place to identify migrants in vulnerable situations at the border, including victims of torture, victims of trafficking and unaccompanied children? Are they adequately assessed and are individuals referred to appropriate authorities or service providers, and treated in accordance with human rights?
- ✓ Are migrants at the borders who need assistance, including medical assistance, competent interpreters, legal aid, referred to the relevant services? And if so, at which stage of the procedure? Are there any limitations on enjoying such services in practice (e.g. lack of interpreters, lawyers, even if in case of referrals)?

Cluster 3: Reception conditions and deprivation of liberty at the borders

Deprivation of liberty and de facto detention at the borders

- ✓ Are there cases of migrants who are intercepted at the borders and deprived of their liberty? (e.g. in police stations, prisons, vehicles of border guards, etc)? Is the deprivation of liberty based in law, necessary and proportionate? Was there an individual assessment carried out by authorized officials? Is the deprivation of liberty foreseen for the shortest possible period? Are there non-custodial alternatives to detention available?
- ✓ Are children or other groups that may be in a vulnerable situation (families, LGBTI persons, older persons, persons with disabilities) also deprived of their liberty / detained? Has your NHRI identified any issues of concern regarding this practice?
- ✓ What are the main human rights concerns identified by your NHRI when monitoring places of detention (e.g. conditions of cells, overcrowding, access to outside space, use of solitary confinement, lack of information, access to legal aid, access to food and basic healthcare, duration of detention, etc.).
- ✓ In case your NHRI has the NPM mandate, have you been able to exercise this mandate at the borders without undue restrictions and with the full cooperation from authorities (e.g. unannounced visits; access to documentation; interviewing migrants, etc)?
- ✓ In case your NHRI does not hold the NPM mandate, have you been able to monitor the rights of migrants held in facilities at the borders, following existing procedures and under your broad human rights mandate (e.g. access to facilities; information from authorities, etc)?
- ✓ Have lawyers, NGOs, human rights defenders or other actors faced obstacles in accessing places where migrants are detained?

Living conditions in reception centres and makeshift camps at borders

- ✓ What are the main human rights concerns identified by your NHRI when monitoring conditions of reception centres at the borders (open facilities, hotspots, etc)?

- ✓ Has your NHRI identified human rights concerns regarding the conditions in makeshift camps and other informal settling of migrants at the borders? Has there been an appropriate response from the government to provide suitable reception facilities to people affected?
- ✓ Do you have official data on the capacity of the reception centres at the borders? Are they open or close centres? Does your NHRI have unhindered access to them? Have you received any complaints or information on inadequate living conditions or other human rights violations in these centres?
- ✓ Are migrants at the borders provided with adequate assistance and information on organisations providing first assistance (humanitarian, medical, legal assistance, information, etc)?

Cluster 4: Human rights accountability at the borders

A system for human rights accountability at the borders

- ✓ In practice, is there an independent and systematic system for human rights accountability at the borders (sufficient monitoring of human rights violations, with the inclusion of civil society; functioning channels for submitting complaints; mechanisms for redress of human rights violations)? Are these systems effective? Are findings published allowing for public scrutiny?
- ✓ Do national authorities carry out thorough investigations when receiving allegations of human rights violations at the borders?
- ✓ Is there a mechanism for identifying, investigating and penalizing misconducts from police / borders guards / other authorities at the borders? Do they work in practice?
- ✓ Is the European Border and Coast Guard (EBCG) / Frontex, or EASO, present at the border? If so, with what mandate and have they recorded cases of violence at the border (e.g. Individual Complaint Mechanism, Serious Incident Reports)? Do you have channels for cooperation with Frontex/EASO, and are they conducive for your NHRI to carry out its mandate?

NHRIs' mandate and work at the borders as human rights defenders

- ✓ Has your NHRI been subjected to threats, attacks, or intimidation from State authorities due to your work on migration?
- ✓ Has your NHRI been subjected to threats, attacks, or intimidation from the general public or specific groups / political parties due to your work on migration? Has there been investigations and were they carried out in an appropriate and effective manner?
- ✓ Are there cases of national authorities at the borders (police officers, border authorities, etc) not cooperating with the NHRI, despite domestic obligations? Are these recurrent events or exceptional cases? How do you assess your NHRI cooperation with authorities at the borders?
- ✓ Is your NHRI sufficiently funded / resourced to carry out a comprehensive, effective monitoring at borders? Have you sent any such concerns with authorities? How

- does this affect the monitoring of borders (e.g. does it leave a gap in human rights monitoring at borders)?
- ✓ Does your NHRI have access to updated and comprehensive data (e.g. statistics) kept by national authorities in relation to migration/borders? Is this data accessible to the public? Is the data of sufficient quality/comprehensive, allowing for monitoring human rights compliance? Has your NHRI been denied access to such data?
 - ✓ Is the government and relevant authorities in the field of migration (border police, asylum authorities, etc) contributing to an enabling environment for the NHRI to carry out its work in the field of migration in an independent and effective manner, in accordance with the UN Paris Principles?
 - ✓ To which extent are the recommendations of your NHRI related to the human rights of migrants at the borders considered by relevant authorities? Has it resulted in changes in practices, policies or legislation towards better protection of rights at borders?

Enabling environment for work of other human rights defenders at the borders (NGOs, civil society, etc)

- ✓ Have national authorities used legislative, administrative or regulatory frameworks to stop or make it harder for human rights defenders to provide humanitarian and legal assistance to migrants and refugees at the borders? (e.g. under legislation criminalising solidarity or the facilitation of unauthorised entry/transit/residence, etc)
- ✓ Has there been any other practices of undue restrictions to NGO's legitimate activities, affecting their ability to monitor human rights situation at the borders, provide legal and humanitarian assistance to migrants, etc?
- ✓ Have politicians / government authorities engaged in speech that discredits, harasses, intimidates, or attacks NGOs or other human rights defenders monitoring, promoting or protecting migrants' rights at the borders?

About ENNHRI

ENNHRI, the European Network of National Human Rights Institutions, works to enhance the promotion and protection of human rights in Europe through strengthening, supporting and connecting European NHRIs. It is made up of over 40 institutions across Europe. The network provides a platform for collaboration and solidarity in addressing human rights challenges and a common voice for NHRIs at the European level.

ENNHRI's work on asylum and migration

ENNHRI members have chosen asylum and migration to be one of the thematic priorities for the network, with special attention given to topics such as immigration detention, the rights of unaccompanied children and migrants' rights at the borders. This work is coordinated through ENNHRI's Asylum and Migration Working Group, which brings together over 25 European NHRIs.

In 2020, selected European NHRIs will monitor borders to assess if and how migrants' rights are respected. After this monitoring exercise, NHRIs will report on their findings and submit recommendations to national authorities.

Through ENNHRI, they will also compare results and agree on joint recommendations to national and regional actors. A high-level conference with key stakeholders will take place in November 2020.

ENNHRI's work on migrants' rights at the borders is supported in part by a grant from the Foundation Open Society Institute in cooperation with the OSIFE of the Open Society Foundations.

Advisory Group and collaboration with other actors

ENNHRI has established an Advisory Group to provide support to our work on migrants' rights at the borders. The objectives of the group are to share experiences and good practices, to work together on engagement with regional and international stakeholders, and to advise on the direction of this workstream. The Advisory Group is composed of civil society organisations, regional and international human rights bodies and ENNHRI members.

ENNHRI's Guidance on monitoring human rights of migrants at the borders is of its role responsibility and does not necessarily reflect the views of the members of the Advisory Group.

Members of the Advisory Group and other partners:

- European Council on Refugees and Exiles (ECRE)
- Amnesty International
- Association for the Prevention of Torture (APT)
- Office of the United Nations High Commissioner for Human Rights
- Council of Europe Commissioner for Human Rights
- Office of the Ombudsman of Croatia (as Chair of ENNHRI's Working Group on Asylum and Migration)
- Other ENNHRI members involved in this activity

While not being formally a member of the Advisory Group, the EU Fundamental Rights Agency (FRA) provides valuable input to ENNHRI's work in this area.

