

# Refugee and Migrant Children's Consortium

## Briefing on the National Age Assessment Board

February 2026

### Introduction

The Refugee and Migrant Children's Consortium (RMCC) is a coalition of over 100 organisations working to promote and protect the rights of young refugees and migrants in the UK.<sup>1</sup> Age disputes have always been a key area of focus for the RMCC and, in recent years, members have repeatedly raised concerns about the increasing number of children being denied the support and protection they need because they are being treated as adults. As the Home Office has taken increased control over the age determination process, flawed decision-making has increased, and hundreds of children have been put at risk.<sup>2</sup>

One key area of concern for the RMCC has been the introduction of the National Age Assessment Board (NAAB). The NAAB, which was established through sections 50 and 51 of the Nationality and Borders Act 2022,<sup>3</sup> is a decision-making function within the Home Office that conducts age assessments on behalf of local authorities when requested to do so by the local authority or by the Home Office (even where a local authority does not deem an assessment necessary). Members have supported young people assessed by the NAAB and noted a number of concerns about how these assessments have been conducted. The Independent Chief Inspector of Borders and Immigration (ICIBI) found that serious concerns remain about its capacity, transparency, and quality assurance - raising questions about the NAAB's ability to fulfil its ambition of being a 'centre of excellence'.<sup>4</sup>

---

<sup>1</sup> See [the RMCC website](#) for more information

<sup>2</sup> A number of reports have been published in the last few years, e.g.:

- Refugee and Migrant Children's Consortium, [Briefing on Age Disputes – Report Stage NC42](#). This briefing outlines RMCC's concerns about the misuse of age assessments as immigration control tools and calls for safeguards to protect children, 2025
- Greater Manchester Immigration Aid Unit, ["This system destroys you": Children trapped in adult asylum hotels by the Home Office](#), 2025
- Refugee and Migrant Children's Consortium, [Lost Childhoods: The consequences of flawed age assessments at the UK border](#), 2025. This report highlights the harm caused by inaccurate age assessments, including detention and criminalisation of children wrongly treated as adults.
- Refugee Council, Helen Bamber Foundation & Humans for Rights Network, [Forced Adulthood: The Home Office's incorrect determination of age and how this leaves child refugees at risk](#), 2024 - This joint report documents how over 1,300 children were wrongly assessed as adults between January 2022 and June 2023, leading to placement in adult accommodation or detention.
- Helen Bamber Foundation, [The psychological impact of the age dispute process on unaccompanied children seeking asylum in the UK](#), 2024. A clinical study showing the mental health toll of age disputes, including increased distress, trauma, and suicidal ideation among affected children.

<sup>3</sup> Available at: <https://www.legislation.gov.uk/ukpga/2022/36/section/50> .

<sup>4</sup> Independent Chief Inspector of Borders and Immigration, [An inspection of the Home Office's use of age assessments: July 2024 – February 2025](#), 2025

## Summary of key concerns

1. **Quality and reliability of assessments** - Multiple legal cases have found NAAB assessments to be flawed, with issues including failure to apply the benefit of the doubt; reliance on subjective or culturally inappropriate indicators; and the dismissal of credible evidence from professionals who know the child. Judges have criticised the NAAB's approach as being adversarial, inconsistent with guidance, and lacking in objectivity.
2. **Inconsistent timeliness and double standards** - Only 14% of NAAB assessments were completed within the 28-day target, with an average duration of 54.6 days, nearly double the timeframe imposed on local authorities. Yet, the Home Office penalises local authorities financially if they exceed this limit, revealing a double standard and a lack of fairness in approach.
3. **Lack of disaggregated data** - The Home Office does not publish disaggregated data comparing NAAB outcomes with initial age decisions or local authority assessments. This lack of transparency makes it impossible to evaluate the NAAB's effectiveness and fairness. The ICIBI highlighted this as a major limitation in accountability and oversight.<sup>5</sup>
4. **Undermining local authority judgement** - The Home Office often refers cases to the NAAB even when local authorities have accepted a young person's claimed age without a full assessment. This undermines professional judgement and contradicts Association of Directors of Children's Services (ADCS) and UN guidance, which permits age acceptance where appropriate.
5. **Lack of independent oversight and quality assurance** – The NAAB's quality assurance framework was only introduced in November 2024 and remains underdeveloped. External stakeholders are not yet involved, raising concerns about transparency and the risk of systemic flaws going unchallenged.
6. **Use of asylum claim information** - The ICIBI inspection found that while NAAB social workers do not have direct access to the Home Office's Atlas caseworking system, the NAAB Operations Team routinely downloads asylum-related documents and shares them with assessors. Inspectors observed that some social workers used this information to question credibility. This practice further blurs the line between independent social work and immigration enforcement, raising serious ethical and professional concerns.
7. **Ethical concerns about Home Office employment of social workers** - The British Association of Social Workers (BASW) and others have raised serious concerns about the Home Office employing social workers to conduct age assessments. This risks undermining the independence of the profession and encroaches on responsibilities that rightly fall to local authorities, the Department for Education, and devolved governments.
8. **Impact on children's mental health and wellbeing** - Young people supported by organisations such as the Greater Manchester Immigration Aid Unit (GMIAU) have described NAAB assessments as more traumatic and invasive than those conducted by local authorities. The process has been linked to deteriorating mental health, including self-harm and suicidal ideation.

---

<sup>5</sup> Independent Chief Inspector of Borders and Immigration, [An inspection of the Home Office's use of age assessments: July 2024 – February 2025](#), 2025

## Summary of key recommendations

1. **Disband the NAAB and reinvest the funding in local authorities** - the NAAB should be disbanded and its funding redirected to local authorities to strengthen their capacity to conduct lawful ('Merton-compliant') age assessments and support unaccompanied children seeking asylum. In the interim, the NAAB should not approach local authority social workers for 12-month secondments, as this further depletes already stretched local authority capacity and undermines the stated aim of supporting local services. *If the NAAB is retained, then the following changes should be made:*
2. **Respect local authority decisions** - The Home Office must not override local authority decisions to accept a young person's claimed age. NAAB referrals should only occur at the request of the local authority, not imposed by the Home Office.
3. **Introduce independent oversight** – The NAAB's quality assurance framework must involve external stakeholders, including children's rights organisations and social work bodies, to improve transparency and accountability.
4. **Publish disaggregated data** - The Home Office should publish quarterly, disaggregated data comparing NAAB outcomes with initial age decisions and local authority assessments, including referral volumes, durations, and legal challenges.
5. **Apply the benefit of the doubt** - All age assessments must consistently apply the principle of the benefit of the doubt, as required by case law and guidance, to prevent children being wrongly treated as adults.

## Overview of the NAAB

Launched in March 2023, the stated intention of the NAAB is to "strengthen and improve processes" for assessing age.<sup>6</sup> By 2025 it had over 50 full-time social workers<sup>7</sup> (many of whom choose to work for the NAAB rather than a local authority because the pay is better, despite the ethical concerns raised by the British Association of Social Workers).<sup>8</sup>

Between the NAAB's inception at the end of March 2023 and May 2025, it completed 194 assessments – in 131 of these (68%) it found the individual to be older than their claimed date of birth.<sup>9</sup> In 2024 alone, 236 referrals were made to the NAAB, but, according to the ICIBI, it has had to reject referrals due to a lack of capacity.<sup>10</sup>

The NAAB cost £1.7 million in its first year of operation<sup>11</sup>, and **in April 2024 to March 2025, the total cost of the NAAB was a staggering £4,928,713.**<sup>12</sup>

---

<sup>6</sup> <https://careers.homeoffice.gov.uk/news/socialworker-oct23>

<sup>7</sup> Figure of 50 provided in letter from Minister for Border Security and Asylum, Angela Eagle, to BASW, RMCC and others on 8 July 2025, and 53 provided in Independent Chief Inspector of Borders and Immigration, [An inspection of the Home Office's use of age assessments: July 2024 – February 2025](#), 2025

<sup>8</sup> British Association of Social Workers, UK Statement: National Age Assessment Board, March 2023

<sup>9</sup> Information from Freedom of Information request FOI2025/06331, answered by the Home Office on 10<sup>th</sup> June 2025.

<sup>10</sup> Information from Freedom of Information request FOI2025/08790, answered by the Home Office on 4<sup>th</sup> August 2025.

<sup>11</sup> Freedom of Information request reference FOI2024/05630, answered by the Home Office on 16 July 2024

<sup>12</sup> Freedom of Information request reference 2025 15707, answered by the Home Office on 11 December 2025

## Quality of assessments

In several recent cases, judges found age assessments by the NAAB to be significantly flawed. In one, an Afghan child was wrongly assessed as an adult despite credible documentary and testimonial evidence; **the tribunal criticised the NAAB's reliance on outdated sources and subjective judgment.**<sup>13</sup> In another case, the High Court concluded that the intervention of the NAAB in an age assessment decision “has arguably given inappropriate weight to the material” that was presented, potentially resulting in a child being wrongly assessed as an adult. This meant they were accommodated with unknown adults away from their support network, and not attending school.<sup>14</sup>

In a case involving a young Eritrean charged with illegal entry, ‘IA’, the Judge found that he was unable to give more than “minimal” weight to the assessment of age conducted by the NAAB. The Judge’s findings included:

- The assessment took an **unfair approach to credibility and relied too heavily on the opinions of a designated social worker**, who had only met the child twice and offered no reasonable explanation for dismissing the evidence from staff at the child’s placement. These staff members had known him for much longer and in a variety of real-world settings.
- The **‘minded to’ process was not carried out fairly** or in accordance with the guidance – the social worker himself stated in cross-examination that he considered the ‘minded to’ process to be an “adversarial” process, which is contrary to guidance.
- The assessment did not recognise that the child's experience is not sufficiently comparable to that of a Western European child.
- The assessment **failed to apply the principle of the benefit of the doubt**, and the lead assessor did not properly grasp the concept; and
- Overall, the assessment focused too heavily on searching for evidence that the child was an adult and **did not give enough weight to supporting evidence.**<sup>15</sup>

In the case of ‘ALK’, the Upper Tribunal found the NAAB assessment to be ‘flawed in various fundamental respects’. Errors included:

- deciding the Applicant’s ID documents were ‘forged’ with no evidence to support this
- relying on ‘inconsistent’ dates of birth ‘supposedly’ given to other officials as evidence he had lied about his age, despite the circumstances in which the interviews were conducted, errors in transcription/lack of translation.
- relying on the eruption of wisdom teeth despite during the hearing acknowledging that ‘no significant weight’ could be attached to this.
- doubting the applicant’s date of birth given to the Spanish authorities without providing any evidence regarding enquiries made.

---

<sup>13</sup> Immigration Social Work Services, [Case Law Update: NAAB Age Assessment found to be flawed.](#)

<sup>14</sup> [R \(RBK\) v Secretary of State for the Home Department & Lancashire County Council \(Administrative Court, Manchester\)](#), Order dated 14 May 2025, claim no. AC-2025-MAN-000126.

<sup>15</sup> Garden Court Chambers, [Home Office concedes age dispute challenge and accepts child refugee wrongly assessed as adult in Criminal Court](#), January 2025.

The weight of the NAAB decision was ‘further reduced’ as the assessors had failed to observe the relevant principles for how to treat children during age assessment interviews who have suffered traumatic experiences.<sup>16</sup>

RMCC members have requested data on the number of NAAB assessments subject to legal challenge via Freedom of Information Act requests, but so far, the Home Office has failed to provide this.

Further concerns have been raised by NGOs, including Humans for Rights Network, about the conduct and quality of NAAB age assessments. These **assessments are often described as combative and adversarial**, with questioning that appears designed to undermine credibility and confirm adulthood. **The process is lengthy and repetitive**, sometimes involving multiple interviews over several hours, and is frequently experienced by children as interrogatory and retraumatising. In some cases, children reported feeling that social workers were “out to get them” and did not believe anything they said.

Only 14% of cases were completed within the 28-day target, with an average duration of 54.6 days - almost twice the prescribed timeframe for local authorities.<sup>17</sup> This discrepancy is especially concerning given that the Home Office withholds funding from local authorities if they surpass the 28-day limit, indicating a need for greater flexibility and fairness in how assessment timelines are managed across agencies.

Young Roots reported that in some cases they were involved in, the NAAB assessors have been reluctant to properly consider evidence that has been made available, including disregarding information from people who work closely with the purported child.

There is also frequently a **failure to consider how mental health, trauma, or learning differences affect a child’s ability to recall information or respond fluently**. The assessments often apply Eurocentric norms when evaluating credibility, disregarding cultural and experiential differences. Moreover, the principle of the benefit of the doubt is routinely ignored, and the credibility of children is frequently questioned by default.

#### **Case study – Kali (*name has been changed*)**

In 2024, Kali arrived in the UK on a small boat. On arrival the Home Office decided, based on a visual ‘assessment’, that he was “significantly over 18” and in fact was seven years older than the age he said he was. He was charged with illegal entry and facilitating illegal entry (under section 24 and 25 of the Immigration Act 1971), despite being 15 years old at the time of arrival. He is the youngest child that Humans for Rights Network (HFRN) is aware of who has been subject to criminal prosecution.

Kali appeared in Folkestone magistrates court, two days after arrival during which time he was held in police cells. At this hearing he was remanded to the care of the relevant local authority and placed in foster care, after telling police officers and other professionals that he was in fact 15. A referral was made by this local authority to the National Age Assessment Board (NAAB) for an age assessment which took place in the summer of 2024.

<sup>16</sup> Summary from Doughty Street Chambers available at: <https://www.doughtystreet.co.uk/news/national-age-assessment-board-decision-quashed-landmark-judgment>

<sup>17</sup> Independent Chief Inspector of Borders and Immigration, *An inspection of the Home Office’s use of age assessments: July 2024 – February 2025*, 2025, p. 17: NAAB Timeliness and QA.

From the outset, HFRN and Kali's solicitor were concerned about his cognitive ability and the possibility that he may have additional learning needs, and how this impacted his ability to recall details of his past and actively participate in an age assessment. His previous traumas and the possibility of him finding it challenging to participate in an age assessment, including a NAAB age assessment which are known to be lengthy and often hostile, were not considered. Kali was assessed to be an adult in late summer 2024 finding him to be seven years older than his claimed age. This was also contrary to the view of his foster carer, who believed Kali to be a child.

The NAAB assessment relied on inconsistencies in Kali's account to conclude that he was not being transparent or honest with assessors, totally failing to consider that struggling to process and recall information may suggest an unmet learning need. It also placed more weight on the views of his social worker regarding his age, a relationship of less than two months than they did on the views of his foster carer who had spent far longer, and more consistent time with Kali.

Kali was rapidly removed from his foster placement and placed in an adult hotel, which he found incredibly difficult without any adult support. During this time Kali was supported by a child trafficking specialist and by a caseworker at HFRN, both who continued to be of the view that Y was a child. It was decided that the best course of action in relation to both Kali's age dispute and his criminal case was to instruct an independent social worker to conduct a second age assessment.

This second age assessment concluded in 2025 determining Kali to be his claimed age - 16 at the time of its completion, a full 11 months since he arrived in the UK. The independent social worker raised concerns that Kali may have a learning disability, and an educational psychologist was instructed, who found that Kali had extremely low cognitive functioning and significant learning difficulties. These new reports were served on the NAAB and it withdrew its assessment and accepted Kali's claimed age.

At a hearing in Margate in 2025, this age assessment was put before the court, the findings of this judge were significant, finding that Kali was in fact a child and that he should now return to the care of the relevant local authority. Not long after this hearing all criminal charges against Kali were dropped.

**Concerns have been raised about interpreter quality and the role of the appropriate adult** during assessments. NGO representatives who support the child are often not permitted to act as the appropriate adult because they know the child, despite being well-placed to advocate for their welfare. The RMCC Member Organisation Young Roots reported several instances in which NAAB initially refused to allow its caseworkers to act as appropriate adults. They were only allowed to participate after extensive escalation and involvement from the young persons' legal representatives. While the Association of Directors of Children's Services (ADCS) guidance outlines the skills and competencies an appropriate adult should have, these standards are not consistently upheld in practice. This can seriously affect both the child's experience and the outcome of the assessment. For example, an inexperienced appropriate adult may not know when to intervene, raise concerns, or take notes in a way that could later be used as evidence in potential litigation, particularly if the assessment does not follow correct procedures.



**Concerns have also been raised about the experience and competency of assessors,** with some social workers reportedly conducting assessments without prior training or experience. The sign-off process lacks transparency, and it is unclear whether assessments are properly reviewed. There is a risk that political discourse may influence professional judgement, undermining the impartiality required by the code of conduct.

Finally, **the length and complexity of NAAB reports can prevent children from accessing timely legal advice,** as solicitors may struggle to establish merit due to the volume of generic content presented as fact. These issues collectively raise serious questions about the reliability, fairness, and child-centredness of the NAAB assessment process.

Young people supported by the Greater Manchester Immigration Aid Unit (GMIAU) expressed their view that **the age assessment process used by the NAAB is deliberately designed to deceive and silence children's voices and experiences.** The duration, intensity, and invasive nature of the assessments are far more severe and traumatic than those conducted by local authorities, increasing the risk of children's mental health deteriorating to the point of self-harm and suicidal thoughts.<sup>18</sup>

While NAAB provides induction and ongoing training to both its staff and local authorities, its **quality assurance (QA) framework - introduced only in November 2024 - remains underdeveloped.** External stakeholders are not yet involved in QA processes, raising concerns about transparency and the risk of insularity.<sup>19</sup>

### Home Office-commissioned evaluation and recent case law

The Home Office-commissioned NatCen evaluation,<sup>20</sup> published in January 2026, reports that the NAAB was perceived by participating Home Office and local authority staff as child-centred, with popular training and some safeguarding benefits - and even claims perceived gains for public spending. However, the evaluation was by design, a qualitative process study with a small sample of 36 interviews – no external stakeholders were involved in the second phase of the evaluation. NatCen itself warns that results “should not be extrapolated to all stakeholders.” While **the evaluation highlights material operational frictions** (slow assessments, capacity and IT problems, interpreter/appropriate adult shortages, and coordination/communication burdens on stretched local authorities), **it provides limited critical exploration of what these mean in safeguarding terms.** Concerns about impartiality/independence are presented mainly as barriers to local authority buy-in rather than explored more meaningfully.

Furthermore, with fieldwork ending December 2024 and publication in January 2026, the evaluation does not consider Upper Tribunal rulings that quashed NAAB assessments - including *R (ALK) v SSHD & Walsall MBC* (explained above)<sup>21</sup> and *R (SS) v SSHD* (2 Dec 2025),<sup>22</sup> which also set out concerns about NAAB's reliance on early intake records

---

<sup>18</sup> GMIAU, [The National Age Assessment Board: children's experiences](#), May 2025

<sup>19</sup> Independent Chief Inspector of Borders and Immigration, [An inspection of the Home Office's use of age assessments: July 2024 – February 2025](#), 2025, p. 17: Quality Assurance Concerns.

<sup>20</sup> Home Office, [Evaluation of the National Age Assessment Board \(NAAB\)](#), 8 January 2026.

<sup>21</sup> Summary from Doughty Street Chambers available at: <https://www.doughtystreet.co.uk/news/national-age-assessment-board-decision-quashed-landmark-judgment>

<sup>22</sup> Summary available through Doughty Street Chambers on: <https://www.doughtystreet.co.uk/news/upper-tribunal-gives-judgment-one-first-successful-challenges-age-assessment-home-offices>

and credibility-led reasoning rather than a rounded, trauma-informed analysis. As BASW has outlined:

*“The report doesn’t consider any measurements of success of the NAAB such as how many successful appeals there had been of Home Office assessments. It talks of training, but not of whether the training resulted in a better quality of age assessment or experience for the young person being assessed. If we are to consider the legal challenges to NAAB age assessments, there is much to doubt of the calibre of age assessment they are conducting.”<sup>23</sup>*

A research-informed, trauma-aware approach that operationalises case law into transparent evidence-gathering, weighting and “minded-to” processes would mitigate these recurring errors by discouraging interrogatory, immigration-style interviews; requiring current multi-source country evidence; treating dental indicators as weak context rather than determinative; and ensuring recorded, verifiable lines of inquiry for document checks.<sup>24</sup>

Those decisions, evidence, and concerns are set alongside the ICIBI inspection (July 2025), which found persistent weaknesses across the age-dispute system (training, record-keeping, assurance, capacity) that the Home Office has accepted it needs to address. **The RMCC’s view remains that NAAB is not the ‘centre of excellence’ is has purported to be and risks causing more harm to children.**

#### **Case study – conduct of NAAB assessors**

Guardianship Scotland supported a young person who was initially treated as an adult at the border and was placed in an adult hotel; after a brief enquiry, the local authority moved him to kinship care where he was integrating well (with a stable placement and taking English lessons). A NAAB assessment was scheduled across four consecutive days (10:00–16:00) with two assessors (Assessor A – lead and Assessor B).

The Guardian observed significant tension between the assessors; Assessor B appeared to undermine Assessor A, read from a script, repeated questions, and made sweeping generalisations about ethnicity. Assessor B’s approach presumed disbelief, including statements such as “the local authority and Home Office don’t believe you” and “this is your last chance to tell the truth”, which created a hostile environment. Assessor B also made inappropriate, objectifying comments about the young person’s appearance (“exceptionally good-looking young man”). During one session, raised voices from both assessors left the young person in tears, but no pause, support, or de-escalation was offered. When the young person re-lived traumatic events (including witnessing death on the journey), questioning continued without breaks. Professional boundaries were repeatedly breached, with personal anecdotes intruding into the assessment.

<sup>23</sup> [3 Years On: BASW UK reviews the National Age Assessment Board | BASW](#)

<sup>24</sup> [ISWS | Resetting Age Assessment Practice: What the Latest Case Law Tells Us and How SAEF Offers a Better Way Forward - ISWS](#)



## Conflict between Home Office practice and local authority decisions

In 2024, the National Age Assessment Board (NAAB) received 192 local authority referrals and 44 Home Office referrals,<sup>25</sup> meaning that **19% of assessments have been requested by the Home Office even though a local authority had accepted a child's age (or assessed them to be under 18).**

RMCC members have reported that social workers are being told by the Home Office that if a local authority chooses to accept a young person's claimed age without conducting a full Merton-compliant assessment (practice which is consistent with the ADCS Age Assessment Guidance and the UNHCR Technical Note on Assessing and Determining the Best Interests of the Child)<sup>26</sup> the Home Office may refer the case to the NAAB. **This approach undermines the professional judgement of local authorities and contradicts established guidance**, which permits age acceptance without a full assessment where there is no significant reason to doubt the claimed age. Given the Home Office's primary focus on immigration control rather than safeguarding, this disconnect - while perhaps unsurprising - is deeply problematic and risks eroding trust between statutory safeguarding bodies and the Home Office, at the expense of the children involved. Recent clinical research has shown that the age assessment process has a profound negative impact on the mental health of unaccompanied children seeking asylum<sup>27</sup> and unnecessary assessments must be avoided.

While it is welcome that NAAB social workers do not have direct access to the Home Office's Atlas casework system, the RMCC remains concerned that they still rely on documents relating to the individual's asylum claims processed through the NAAB Operations Team. Employing social workers within the Home Office has raised serious concerns, and their use of asylum claim information in age assessments undermines the independence and objectivity of the NAAB assessment process.<sup>28</sup> There are also wider impacts of putting children through poor and often adversarial assessments. When children undergo poor age assessments they often lose confidence in the asylum system, which undermines their ability to present clear and consistent accounts in interviews and in court, as a result, they risk being denied the international protection to which they are entitled, while the compounded trauma exposes them to further harm.

### Case study – unnecessary use of the NAAB

One RMCC member is working with a local authority that had already completed a Merton-compliant age assessment, but the Home Office has refused to accept it. The case was referred to the NAAB in February 2025, yet the assessment had still not commenced nine months later, leaving the young person in limbo despite the local authority having no safeguarding concerns about treating them as a child.

<sup>25</sup> Information from Freedom of Information request FOI2025/08790, answered by the Home Office on 4<sup>th</sup> August 2025

<sup>26</sup> Association of Directors of Children's Services (ADCS), [Age Assessment Guidance](#), October 2015. This guidance supports social workers in conducting lawful age assessments of unaccompanied asylum-seeking children in England. United Nations High Commissioner for Refugees (UNHCR), [UNHCR's Approach to Age, Gender and Diversity](#), 2020. This technical note outlines principles for assessing age and ensuring protection-sensitive approaches for children and youth.

<sup>27</sup> Helen Bamber Foundation, [The psychological impact of the age dispute process on unaccompanied children seeking asylum in the UK](#), May 2024

<sup>28</sup> Independent Chief Inspector of Borders and Immigration, [An inspection of the Home Office's use of age assessments: July 2024 – February 2025](#), 2025. p. 17: Use of Home Office Data.

### **Case study – unnecessary use of the NAAB**

One local authority allowed the NAAB (on the Home Office's request) to conduct an assessment for an age disputed young person whom they had already accepted as a child. The NAAB assessed them as an adult, but the local authority maintains that they are a child and has real concerns about their welfare, and about possible learning difficulties. The local authority is still looking after them as a child at this point in time but the Home Office has stated that their asylum claim will be processed as if they are an adult

## **Conclusion**

The National Age Assessment Board (NAAB), housed within the Home Office, presents significant risks to the integrity of age assessment processes. Its positioning within an immigration enforcement body undermines the safeguarding principles central to assessing vulnerable children. Assessments have been criticised for being adversarial, inconsistent, and lacking transparency, with serious concerns raised by courts, social work bodies, and children's rights organisations. Operational delays, flawed decision-making, and the absence of independent oversight further erode trust. The NAAB's existence risks duplicating and displacing the statutory role of local authorities, while failing to deliver a child-centred, rights-based approach.

## **Recommendations**

**1. Disband the NAAB and reinvest resources into local authorities** – the near - £5 million funding a year should be redirected to local authorities to strengthen their capacity to conduct Merton-compliant age assessments and support unaccompanied children seeking asylum who are in their care. Local authorities are best placed to assess children's needs in context, with safeguarding frameworks and multi-agency support already in place.

*If the NAAB is retained, then the following changes should be made:*

**2. Prohibit NAAB referrals where local authorities accept claimed age** - The Home Office must not override local authority decisions to accept a young person's claimed age without a full assessment. This practice undermines professional judgement and contradicts ADCS and UN guidance. NAAB referrals should only be permitted where a local authority requests support.

**3. Establish independent oversight and quality assurance** - NAAB's quality assurance framework must be urgently strengthened. External stakeholders, including children's rights organisations, legal experts, and social work bodies, should be involved in designing and monitoring QA processes. This is essential to address concerns about transparency, insularity, and flawed assessments, as highlighted in recent judicial findings and the ICIBI report from July 2025.

**4. Ensure full transparency and data disaggregation** - The Home Office must publish, on a quarterly basis as part of the immigration statistics, disaggregated data comparing NAAB outcomes with initial age decisions and local authority assessments. This should include referral volumes, assessment outcomes, duration, and legal challenges. Without transparency, it is impossible to evaluate NAAB's effectiveness or fairness.

**5. Uphold the principle of the benefit of the doubt** - All age assessments, whether conducted by NAAB or local authorities, must uphold the principle of the benefit of the doubt, as required by case law and international guidance. The ICIBI report and recent court cases show that NAAB assessments have failed to apply this principle consistently, putting children at risk of harm.

For more information, contact:

Maddie Harris, Director and Founder, Humans for Rights Network at

[Maddie@humansforrightsnetwork.com](mailto:Maddie@humansforrightsnetwork.com);

Kama Petruczenko, Senior Policy Analyst, Refugee Council, at

[Kama.Petruczenko@RefugeeCouncil.org.uk](mailto:Kama.Petruczenko@RefugeeCouncil.org.uk); and

Kamena Dorling, Director of Policy Helen Bamber Foundation at [kamena.dorling@helenbamber.org](mailto:kamena.dorling@helenbamber.org)