



A journey for
children's
rights:

Joint reaction
to the new EU
Strategy on
the Rights of
the Child

July 2021

This position paper is endorsed by the undersigned organisations:

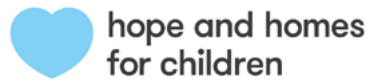


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The 24th of March 2021 is an important date for the rights of the child. The European Commission (Commission) released its Communication for a new [EU Strategy on the Rights of the Child](#) (Strategy). This document outlines proposals, actions and initiatives to further the rights of children across six thematic areas, each one defining the priorities for action within the EU and globally for the years to come.

We, the undersigned organisations, welcome this ambitious and comprehensive Strategy, enshrined in the Charter of Fundamental Rights of the EU and guided by the United Nations Convention on the Rights of the Child (UN CRC).

We are pleased to see the Strategy taking on board many of the recommendations laid out in our [Joint Position Paper on a Comprehensive Child Rights Strategy](#) (July 2020; henceforth Joint Position Paper). We commend the European Commission's recognition that all children are equal and its recognition of children as active citizens and agents of change playing a leading role in society. We also welcome the commitment to create a child-friendly culture in EU policy-making and to mainstream and coordinate initiatives at national level and among key stakeholders to ensure better implementation of existing EU and international obligations. We commend the Commission's efforts to ensure that the Strategy was developed in consultation with children, and the creation of child-friendly versions of the document.

With Council Conclusions expected in the coming months and the implementation of the Strategy underway, we would like to share our brief assessment and present some recommendations for the future.

1. Participation in political and democratic life

We welcome the Commission's commitment to child participation and empowerment and the recommendation for EU Member States to establish, improve and provide adequate resources for new and existing mechanisms of child participation at local, regional and national level. This strengthens the message throughout the Strategy that child participation is a right and must be promoted and improved across the EU.

We particularly appreciate the Commission's:

- Creation of an EU Children Participation Platform that would allow children to be involved in the EU decision-making processes;
- Commitment to include children in the upcoming Conference on the Future of Europe and the European Fundamental Rights Agency (FRA) Fundamental Rights Forum;
- Creation of a space for children to become active participants of the European Climate Pact through pledges or becoming Pact Ambassadors. By involving schools in sustainable climate, energy and environment education, the Education for Climate Coalition will help children to become agents of change in the implementation of the Climate Pact and the European Green Deal;
- Promotion of child-friendly and accessible language in documents published by the EU;
- Commitment to prepare a Youth Action Plan by 2022 to promote youth and child empowerment and participation.

- Commitment to increase expertise on child participation among Commission and EU's agencies' staff, including on child protection and safeguarding policies;
- Commitment to conduct child-specific consultations for relevant future actions.

At the same time, we call attention to the following:

- **Right to information:** The children's consultations raised the importance of informing children about their rights¹. In line with Art. 42 UN CRC, the General Comment 12 and the nine basic requirements for the implementation of Art. 12 UN CRC, informing children from all backgrounds about their rights should be fully mainstreamed across all the six thematic areas of the Strategy. This will ensure that child participation is transparent and informative, that the principle of democracy is ensured and respected, and that discrimination is avoided.
- **Inclusive and rights-based participation:** Stronger recommendations and actions are needed to ensure the participation of young children, children in vulnerable situations and/or socially excluded, and children outside the EU. This should include setting up structural and inclusive child participation mechanisms, accompanied by sufficient EU financial resources, to ensure accountability.

2. Socio-economic inclusion, health and education

We welcome the recognition that every child has the right to an adequate standard of living and equal opportunities from the earliest stages of life. The issue of access to psychosocial and mental health support gains greater visibility and is recognised as a priority in the Strategy, including for children in migration. A child's earliest years are essential for their development throughout their entire life. Equally important is recognising that children at risk of poverty and social exclusion are more likely to experience difficulties in accessing essential services, particularly in rural, remote and disadvantaged areas. The three sub-chapters on child poverty, healthcare, and inclusive quality education (including early childhood education and care) and the chapter on combating violence against children capture key issues for children.

We particularly appreciate the Commission's:

- Proposal to establish a European Child Guarantee;
- Recognition that all children, regardless of their racial and ethnic origin, religion or belief, disability, nationality, residence status, sex and sexual orientation should have guaranteed access to inclusive, non-segregated quality education, so they can develop key competencies and talents starting with early childhood education and care and throughout their formal and non-formal schooling and vocational training;
- Commitment to ensuring complementarity with the European Strategy for the Rights of Persons with Disabilities, to respond to the needs of children with disabilities and provide better access to mainstream services and independent living;
- Recognition of the need to prevent family separation, maintaining that poverty should

¹ <https://www.eurochild.org/uploads/2021/05/Report-Our-Europe-Our-Rights-Our-Future-.pdf>

never be the only reason for placing children in care and calling for integrated child protection systems to ensure early intervention, family support, and to adequately support children without or at risk of losing parental care;

- Invitation to Member States to identify children as a priority target group in their national mental health strategies;
- Commitment to provide information and exchange of best practices to address children's mental health; and set up an expert group for creating supportive learning environments and supporting well-being at school.

At the same time, we call attention to the following:

- **European Child Guarantee:** The Commission should support Member States to prepare comprehensive Child Guarantee Action Plans, in consultation with children and civil society organisations. EU funds should be complemented by national financial resources to support the implementation of these Plans.
- **Access to health:** We regret that the Strategy has not introduced specific measures to update the existing EU framework for action on mental health and well-being. We also regret that access to quality maternal, post-natal healthcare is not mentioned in the Strategy, except in the context of humanitarian action outside of the EU.
- **Children in migration's access to basic services:** In order to ensure adequate protection and access to essential services of all children in migration, EU Member States should fully implement the European Commission's 2017 Communication on the Protection of Children in Migration.

3. Combating violence against children and ensuring child protection

We welcome the Commission's approach to addressing violence against children, including gender-based violence, online child sexual abuse and the varied forms of violence experienced by children in migration, which considers prevention and protection from violence. We also welcome the reiteration of the Commission's commitment to step up efforts to ensure the supply chains of EU companies are free from child labour. We commend the Commission's strong promotion of integrated child protection systems that place the child at the centre, prevent family separation, encourage all relevant authorities and services to work together, promote the shift to quality community- and family-based care, and provide support for children ageing out of care. We are also pleased that the Commission reiterates all children's right to live with their families and in a community.

We particularly appreciate the Commission's:

- Proposal to present an initiative aimed at supporting the development and strengthening of integrated child protection systems;
- Invitation to Member States to improve the functioning of child protection systems at national level, in particular: 1. Establish or improve child helplines (116 111) and missing children hotlines (116 000); 2. Promote national strategies and programmes to speed up

de-institutionalisation and the transition towards quality family- and community-based care and services, with an adequate focus on preparing children to leave care, including for unaccompanied migrant children;

- Further support for the establishment of Barnahus Houses in the EU;
- Legislative proposal to combat gender-based violence against women and domestic violence, while supporting the finalisation of the EU's accession to the Council of Europe Convention on preventing and combatting violence;
- Legislative initiative on sustainable corporate governance to make supply chains free of child labour.

At the same time, we call attention to the following:

- **Limited actions to combat violence:** While the impact of violence on the most vulnerable children is mentioned, the Commission's actions and recommendations to address violence against intersex children, girls and victims of female genital mutilation (FGM), or to support children directly or indirectly impacted by justice systems and children in migration, can only be seen as a first and partial step.
- **Trafficking:** The Strategy does not include sufficient focus on trafficking, and does not recognise existing links between institutions and child abuse and trafficking including the phenomenon of orphanage trafficking, the exploitation of children and sexual violence against children in institutions.²
- **Supporting prevention:** With the exception of female genital mutilation and gender-based violence, the Strategy fails to offer new avenues to sufficiently prevent violence (e.g. through education). We encourage more guidance and strong recommendations to Member States to set up institutionalised monitoring and data gathering mechanisms to measure the magnitude of the phenomenon of violence at national level; to ensure appropriate reporting and detect violence against children; and to strengthen the response of national child protection systems to prevent and combat violence against children and channel it to law enforcement.

4. Child-friendly justice

We welcome the Commission's recognition of the impact of Covid-19 on children and justice, acknowledging that national judicial systems must be better equipped to address children's needs and rights - including a specific focus on cross-border cases, and that judicial proceedings must be adapted to children's ages and needs, must respect all their rights and give primary consideration to the best interests of the child. We equally welcome the confirmation that the 2017 Communication on the Protection of Children in Migration complements the Strategy, and reiterates that the best interests of the child must be the primary consideration in all actions and decisions concerning children in migration. We welcome the reiteration that children will always be offered adequate accommodation and assistance, including legal assistance, throughout the migration procedures. We also welcome the recognition of the

² Lumos, (2020), Cracks in the Systems Report, available at: <https://www.wearelumos.org/resources/cracks-system/>

specific challenges faced by stateless children, including the lack of effective access to some basic services such as healthcare and education, which can exacerbate the risk of violence and exploitation.

We particularly appreciate the Commission's:

- Invitation for Member States to promote and ensure universal, free and immediate access to birth registration and certification for all children and increase capacity of front-line officials to respond to statelessness and nationality-related problems in the context of migration;
- Proposal for a horizontal legislative initiative in 2022 to support the mutual recognition of parenthood between Member States;
- Contribution to the training of justice professionals on the rights of the child and child friendly justice;
- Provision of targeted financial support for trans-national and innovative projects to protect children in migration under the new Asylum, Migration and Integration Fund (AMIF);
- Support to Member States in the development of effective and viable alternatives to the detention of children in migration procedures;
- Invitation for Member States to develop robust alternatives to judicial action: from alternatives to detention, to the use of restorative justice and mediation in the context of civil justice;
- Invitation for Member States to strengthen guardianship systems for all unaccompanied children including through participation in the activities of the European Guardianship Network;
- Invitation for Member States to implement the Council of Europe's Recommendation on children with imprisoned parents (CM/Rec(2018)5).

At the same time, we call attention to the following:

- **Ending the detention of children:** We regret to conclude that in the Strategy the European Commission does not express the need to completely rule out the detention of children in migration. We call for an EU plan to end the detention of children in migration and their families, and recommend supporting Member States in the development of community-based, non-custodial alternatives to detention only.³ These alternatives should ensure family unity is preserved. We urge the Commission to promote the implementation at national level of the recommendations developed by the UN Global Study on Children deprived of Liberty, aimed at ending detention for migration-related purposes and reducing deprivation of liberty in all other contexts, and to develop guidelines to ensure their full implementation. Member States should draft a plan of action at national level including concrete measures and actions and indicators to measure progress.
- **Ensuring child rights in migration and asylum procedures:** To ensure that children's rights are mainstreamed throughout the EU framework as intended by the Strategy, we call for an impact assessment of all legislative proposals related to the Migration

³ <http://picum.org/alternativestodetention/>

and Asylum Pact, including the Eurodac. Sufficient child rights safeguards should be mainstreamed throughout the EU migration and asylum framework. We recommend adopting EU guidelines on procedural safeguards for children in migration procedures to encourage the inclusion of adequate safeguards in national-level procedures and policies.

- **Non-discrimination in judicial proceedings:** Resilient child-friendly justice systems should be grounded in dignity, equity, equality and non-discrimination, including all children involved in justice systems⁴. We welcome the specific focus on children in migration, stateless children, child victims of crime and children of imprisoned parents, but would encourage a more inclusive approach to ensure all children are covered (e.g. child suspects, victims, perpetrators, witnesses, detainees, children in welfare proceedings, children recruited by armed groups including terrorist groups, etc.). The strategy does not include any concrete action to ensure that any child-friendly justice system is resilient and that procedural safeguards, including e-justice procedural safeguards, are fully respected. We call on the Commission to produce a child-focused report to the European Parliament and the Council by June 2022 to assess if Member States have taken the necessary measures to ensure equal access to justice for all children without discrimination, and the effective implementation of procedural safeguards for children as provided in Directive 2016/800 and of the rights of child victims as per Directive 2012/29/EU.
- **Improving the use of technology:** Drawing upon the lessons learned from the Covid-19 pandemic and promising practices to safeguard children's rights in the justice sector in times of crises, we call on the Commission to collect data and provide guidance in collaboration with ICT partners, to explore how digital tools can be adapted for safe, appropriate and child-friendly use of technology in the implementation of child-friendly justice systems. This should also include using technology to inform children of their rights in judicial procedures and train professionals on child-friendly justice.

5. Digital and information society

We welcome the Strategy's dual recognition of the opportunities and potential harms of the digital environment, as also highlighted in our Joint Position paper. We particularly appreciate that the Commission will:

- Step up the fight against all forms of online child sexual abuse, such as by proposing the necessary legislation including obligations for relevant online services providers to detect and report known child sexual abuse material online;
- Promote the development and use of accessible ICT and assistive technologies for children with disabilities such as speech recognition, closed captioning and others, including in Commission's conferences and events;
- Adopt an updated Better Internet for Kids strategy in 2022;
- Ensure the full implementation of the European Accessibility Act;
- Invite Member States to ensure effective equal access to digital tools and high-speed internet connection, digital literacy, accessible online educational material and education tools etc. for all children.

⁴ http://tdh-europe.org/upload/document/7293/JUST_with_Children_Policy_Brief_EC_Strategy_Child_Rights.pdf

At the same time, we call attention to the following:

- **Online child sexual abuse and exploitation:** The Strategy invites ICT companies to step up efforts to detect, report and remove illegal online content, including child sexual abuse, from their platforms and services in accordance with the law. We call for a regulation and enforcement mechanism that incentivizes the private sector to protect children and their rights, including by installing features and measures for use that are safe for children, while preventing false positives and erroneous profiling of racialized, marginalized or minority populations.
- **Digital divide:** This pillar fails to properly embed an “equality and inclusion” perspective which is necessary to improve digital inclusion and empowerment and overcome the digital divide. With the Covid-19 pandemic, daily life has changed making the digital transition an everyday reality. However, because of the lack of internet access, millions of children in Europe and across the globe are not benefitting from the digital transition. As a result, the digital divide is growing which negatively impacts children’s lives and rights including their access to education. Children in need are the most affected by the digital divide. Due to affordability, social factors and infrastructure girls are particularly affected. The Commission, the EEAS and Member States need to commit to prioritising this issue in their actions in line with the recently adopted General Comment 25 on children’s rights in relation to the digital environment (2 March 2021).⁵
- **Privacy of data:** Children seem to be mostly seen as users of technology who run risks, and not the objects technology is used on. However, the sharing of data and the interoperability of several (migration-related) databases will impact hundreds and thousands of children. We call for the adequate protection of children’s privacy and ensuring firewalls are in place between migration enforcement and other actors such as education and service providers.

6. The Global Dimension

We welcome the EU’s commitment to champion children’s rights globally in development and humanitarian policies, actions and funds, and alignment with the EU Action Plan on Human Rights and Democracy 2020-2024 and other relevant initiatives such as the EU Guidelines on the Promotion and Protection of the Rights of the Child, The Guidelines on Children and Armed Conflict and the EU Gender Action Plan for external action 2021-2025. We also welcome the EC’s commitment to continue supporting children in humanitarian crises while applying a needs-based approach in accordance with the humanitarian principles, as well as ensuring that its aid is gender and age sensitive. We commend the EU for putting emphasis on child protection, addressing all forms of violence against children, especially against girls, providing mental health and psychosocial support, providing continued access to safe, quality and inclusive education and implementing a zero tolerance approach to child labour.

⁵ <https://docstore.ohchr.org/SelfServices/FilesHandler.ashx?enc=6QkG1d%2fPPRiCAqhKb7yhsqlkirKQZLK2M-58RF%2f5F0vEG%2bcAAx34gC78FwvnmZXGFUI9nJBDpKR1dfKekjxW2w9nNryRsgArkTJgKelqeZwK9WXzMkZRZd37nL-N1bFc2t>

We particularly appreciate the Commission's commitment to:

- Invest in the development of quality alternative care and the transition from institution-based to quality family- and community-based care for children without parental care and children with disabilities;
- Dedicate 10% of overall funding under the NDICI in Sub-Saharan Africa, Asia and the Pacific and the Americas and the Caribbean to education;
- Continue allocating 10% of humanitarian aid funding for education in emergencies and promote the endorsement of the Safe Schools Declaration⁶;
- Work towards making supply chains of EU companies free of child labour through a legislative initiative on sustainable corporate governance;
- Invest in the development of quality, accessible education systems, including early childhood, primary, lower and upper secondary schooling;
- Prepare a Youth Action Plan by 2022 to promote child and youth empowerment and participation;
- Designate Youth focal points and strengthen child protection capacities within the EU Delegations (hereafter EUDs).
- In line with the Action Plan on Human Rights and Democracy, step up the EU's efforts to ensure meaningful child participation; to prevent, combat and respond to all forms of violence against children, including gender-based violence; to eliminate early, forced and child marriage, female genital mutilation, child trafficking, smuggling, begging, (sexual) exploitation and neglect.

At the same time, we call attention to the following:

- **Coordination with EU delegations:** To ensure effective coordination & coherence, the EU Strategy on the Rights of the Child should be proactively communicated to all EUDs alongside the requirement to ensure the priorities of the strategy are reflected in the Human Rights and Democracy country strategies. Local CSOs should be meaningfully involved in this process.
- **Children and Youth Action Plan:** Although we welcome the EC's intention to develop a Youth Action Plan, we are concerned that the Plan might be limited to a specific group of children (falling under the definition of 'youth') and not covering children of all ages. In doing so it might create double standards with the rest of the Strategy. Therefore we recommend extending the scope of the Action Plan to 'Children and Youth' proposing some concrete actions to be implemented via the EU's external action.
- **Youth focal points and child protection in EU delegations:** We welcome the introduction of youth focal points across EU Delegations and the commitment to strengthen the capacity of EUDs staff on child protection. Given the particular needs of children, however, it is critical that EUDs also have child rights focal points with the expertise in facilitating both children and youth participation and engagement with civil society. We recommend that the Commission and the EEAS develop guidelines for the meaningful participation of youth and children. Moreover, local CSOs should be meaningfully involved in the development and delivery of training for EUDs on child

⁶ <https://ssd.protectingeducation.org/>

protection. The Child Rights Action Group can support the process of developing the guidelines and facilitating the involvement of CSOs in the trainings.

- **Quality alternative care and deinstitutionalisation:** In line with the principle of non-discrimination, we call on the Commission and the EEAS to promote equal access to quality alternative care for all children, including unaccompanied migrant, refugee and asylum-seeking children – with a focus on promoting family reunification and providing family- and community-based solutions.
- **Child marker:** We regret that the Strategy does not propose to develop and implement a Child Marker. We call on the Commission to implement a Child Marker to monitor and report on EU external investments in children, therefore improving the existing monitoring framework which currently does not allow to track EU external spending benefiting children, and ensuring that 25% of the Neighbourhood, Development, and International Cooperation Instrument (NDICI) annual spending is focused on child-specific outcomes.
- **Child rights in political dialogues:** We support the EU's recognition of the need to continue to advocate for children's rights in the political dialogues with partner countries via the accession negotiations and the Stabilisation and Association process. In this regard, we call on the EU to ensure that all the Association Agreements in place adopt strong language on Children's rights, potentially through a dedicated chapter on cooperation for the protection and promotion of the rights of the child. This is not the case at the moment for all Association Agreements.

7. Embedding a child perspective in all EU actions

We welcome the Commission's commitment to mainstream the views of children in all relevant policies, legislation and funding programmes, highlighting among other things the key role of reliable and comparable data.

We particularly appreciate the Commission's:

- Proposal to develop a mainstreaming checklist on the rights of the child;
- Invitation to the Fundamental Rights Agency to continue to provide Member States with technical and methodological support, inter alia, on the design and implementation of data collection practices;
- Setting up of the EU Network for Children's Rights by the end of 2021, which will regularly involve children and international non-governmental organisations.

At the same time, we call attention to the following:

- **Data collection:** In addition to age, sex, race and ethnic origin-disaggregation, we would like to see more disaggregated data on children in vulnerable situations. We would also like to improve data collection on children in their very early years, children in alternative care (including children in institutions), children with a parent in prison, Roma children, children in rural and remote areas, children with disabilities, etc. Data collection on mental health issues should also be a key priority, especially given the impact of the COVID-19 pandemic.
- **Policy coherence:** A “do no harm” approach to children’s rights is not sufficiently addressed among the six thematic areas of the Strategy, and other EU policies impacting children’s rights, lives and well-being. In addition, the connection with the Agenda 2030 and its SDGs could be strengthened as the SDGs are mentioned only once in the text. This lack of policy coherence also extends to the interplay between the internal and the external dimension of the Strategy, including, but not limited to, important areas such as the green transition, digitalization, and ending all forms of violence. Moreover, there is no mention of the EU-Africa Strategy currently under discussion between the EU and African governments and to be adopted at the next EU-Africa Summit.

8. Other key thematic areas for children’s rights

Some key thematic areas, such as gender, climate change and children in migration, are mainstreamed throughout the Strategy. Given that these are critically important thematic areas for children, we would like to highlight the following:

- Generally, **gender** is acknowledged and mentioned as a factor that might translate into specific vulnerabilities and challenges for children. Unfortunately, attention to diversity and intersectionality is lacking. It should also be noted that the proposed actions mainly address legislative frameworks and do not propose anything to address power imbalances and structural challenges through a gender-transformative approach.
- **Climate change** is a very marginal element of the Strategy. While the climate crisis is acknowledged as a risk and a factor that exacerbates existing inequalities, especially in humanitarian contexts, not much further analysis is dedicated to it. Children’s voices and role in climate-related decision-making are also acknowledged, and their participation in the EU Green Deal is superficially encouraged through school’s participation in the Climate Pact. We call on the European Commission and EU Member States to ensure children’s meaningful participation in policies and measures related to climate change and environmental protection at EU, national, regional and local level.
- Actions and recommendations targeting **particularly vulnerable children, including children in migration, Roma children, children without or at risk of losing parental care; children in rural and remote areas and children with disabilities** are integrated across the pillars. It is key that all initiatives targeting children take into account the particular concerns of all children, and address the specific needs of the different vulnerable groups. This should include children who are stateless or at risk of statelessness, and those who are undocumented. We hope that the Commission, and the Council in its upcoming Conclusions, will ensure these children’s specific needs are addressed.

9. Implementation of the Strategy

For the Strategy to effectively deliver on its priorities and actions, it is key to set up a robust implementation mechanism. We thus welcome the Commission's intention to:

- Support Member States to make the **best use of EU funds** in their initiatives to protect and fulfil the rights of the child, and the call for child rights budgeting.
- Encourage national governments to allocate adequate funding through sub-granting schemes to enable **civil society organisations to participate** in the implementation of the Strategy.
- **Monitor the implementation** of the strategy at EU and national level, to report on the progress at the annual European Forum on the rights of the child, and to ensure children will be part of the monitoring and evaluation through the new Children's Participation Platform.
- Call on Member States to develop, where not yet available, robust and evidence-based national strategies on the rights of the child, in cooperation with all relevant stakeholders, including children.

That being said, the implementation framework lacks some important considerations. We call attention to the following:

- **Partnership Principle:** We welcome close collaboration between the Commission and child rights organisations. It is essential to ensure that CSOs are systematically included across the implementation of the strategy, rather than ad hoc, and we hope this can extend to the planned EU Network for Children's Rights and to the work of EU Delegations on the ground.
- **Monitoring and evaluation:** In order to ensure transparency and accountability, it is essential that the Strategy is accompanied by a clear framework to monitor its implementation and evaluate impact. This framework for implementation should ensure the actions are time-bound and accompanied by indicators to measure the achievement at EU and national level. With a few exceptions in some areas, the Strategy fails to set up time-bound actionable commitments.
- **Timeframe of the Strategy:** While in our Joint Position Paper we called for a long-term strategy (10 years) in line with the 2030 Agenda, the Strategy only covers the period from 2021 to 2024 which does not allow a mid-term review needed to eventually re-adapt and adjust the strategy's priorities. Moreover, in such a short time frame the actual implementation of the Strategy will be difficult not only to be effective, bringing long-lasting impact, but also to be monitored. We hope a second strategy will be adopted by 2025, building on the lessons learned from the current Strategy.
- **Capacity:** In order to ensure an efficient implementation of the child rights strategy, we encourage increasing the capacity of the child rights coordinator in DG JUST to lead on the delivery. Echoing the European Parliament's Child Rights Intergroup proposal, this should include establishing a child rights unit exclusively devoted to children's rights, both in the European Commission and in the European External Action Service. These units should have the necessary mandate and sufficient human resources to carry out

their role effectively. The mandate of the Child Rights coordinator should also be clearly defined and communicated externally.

- **Coordination and training:** We recommend investment in capacity and training for the child rights coordinators/focal points across all relevant Commission services, the EEAS and EU delegations, and to expanding the mandate for an inter-service group on children's rights. Training may be extended also to Member States Permanent Representations.
- **EU Network for Children's Rights.** It is important to ensure that nominations to the EU Network for Children's Rights are civil servants with relevant knowledge and decision-making power in their respective governments, ideally also with the responsibility for the implementation of, and reporting to, the UNCRC.