

**Digital inequality and
children's rights:
How children's
backgrounds shape
children's experiences in
the digital environment**



Eurochild
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Introduction

Children do not experience the digital environment equally. Poverty, disability, migration status, care status, housing deprivation and discrimination shape whether children can access, understand and safely benefit from digital technologies. Too often, digital policy treats children as a single group, as if all children enter the digital environment with the same access, skills, support and protection. Children growing up in poverty, in precarious family situations, facing discrimination or in other situations of vulnerability often experience the digital world very differently.

These differences matter for children's rights. Connectivity alone does not guarantee meaningful access. Children need affordable and reliable internet, appropriate devices, accessible services, digital skills, trusted adults, safe online spaces, and effective routes to support and remedy. Without these conditions, offline inequalities are reproduced and often intensified online.

Children's backgrounds influence the enjoyment of all children's rights, including in the digital environment. Children's backgrounds shape not only their access to the digital environment but also their ability to meaningfully exercise their rights within it, including the rights to education, information, participation, privacy, protection from violence, and access to services and remedies. While all children can face challenges online, these risks may be amplified for those who have limited access to digital technologies and services, limited knowledge of how to use them, and limited support in their offline and online lives.

While all children can face challenges online, these risks might be amplified for those who have limited opportunities to access digital technologies and services, lack knowledge of how to use them, and lack support in their offline and online lives, where offline inequalities are reproduced and often intensified in the digital environment. Socio-economic disadvantage shapes the conditions in which children use digital technologies. Lower access to digital literacy, active parental mediation, privacy-supportive skills, and timely adult intervention can leave children less equipped to prevent, report or recover from harmful online interactions.

This is particularly relevant for the groups targeted by the European Child Guarantee, including children experiencing homelessness or severe housing deprivation, children with disabilities, children with mental health issues, children with a migrant background or ethnic minority origin, children in alternative care and children in precarious family situations.

These children often face compounded disadvantages, where offline inequalities are reproduced and intensified in the digital environment.

In today's Europe, effective access increasingly depends on whether children and families can navigate, benefit from and be protected in the digital environment. **Digital inclusion should therefore be treated as a core children's rights and child poverty issue**, including within the European Child Guarantee, aimed at ensuring effective access to essential services for children in need. Their access to connectivity, the support available to them, including support for developing their digital skills, their exposure to risks, and their ability to seek help are all influenced by broader structural inequalities.

This concern is increasingly recognised at EU level. The 2026 [report](#) by the Co-Chairs of the Special Panel on Child Safety Online emphasises that children's exposure to online risks is shaped not only by age, but also by socio-economic background, family circumstances and other individual factors. It further recognises that the same digital features or behaviours may affect children differently depending on the resources and support available to them.

The proposed EU KIDS Act offers an opportunity to translate this recognition into binding obligations for providers. Its safety-by-design requirements could help ensure that children's protection does not depend on their family's resources, digital skills or ability to supervise their online activities. However, access rules and guardian requirements must also be assessed for their effects on children in different circumstances. Measures intended to protect children should not deepen existing inequalities or exclude those who lack documentation, accessible technology or an available guardian.

"We need to focus on the situation of children in poverty, especially those without educational opportunities. In Ireland, there is no standard measure to educate children on social media. It's important to have standardised education." - Ruth, Ireland, 16 years old, member of the NOVA Council

1. Children's rights in the digital environment and inequality

A children's rights approach requires recognising that rights apply online as well as offline, and that unequal digital conditions affect children's ability to enjoy those rights in practice. Although the United Nations Convention on the Rights of the Child was adopted in 1989, before the digital environment became embedded in children's daily lives, children's rights apply fully online as well as offline. [General Comment No. 25](#) of the United Nations Committee on the Rights of the Child clarifies how the Convention should be interpreted in the digital environment. It also establishes that meaningful access to digital technologies can support the realisation of children's rights, while also emphasising that **States must pay particular attention to children in disadvantaged or vulnerable situations**.

[Children's well-being online](#) is closely linked to the circumstances they live in, including poverty and social disadvantage. **Children in vulnerable situations are disproportionately vulnerable to online harm**. For instance, according to the [OECD](#), children from lower socio-

economic backgrounds experience cyberbullying at double the rate of peers from more affluent backgrounds.

For children with disabilities, the digital environment can expand access to information, communication and participation, but inaccessible design and limited tailored safeguards can turn digital services into another site of exclusion. According to research conducted, **young people with disabilities were less likely to say they can be online without encountering scary images or false information.**

Recent cross-national evidence also shows that socio-economic background shapes the relationship between social media use and adolescent wellbeing. Problematic social media use is consistently associated with higher psychological complaints and lower life satisfaction among adolescents, but these **negative associations are stronger for adolescents from lower socio-economic backgrounds.** This suggests that risk-related social media behaviours do not affect all children equally, and that children with fewer social, educational and family resources may be less able to mitigate harmful online experiences.

2. The digital divide: from access to unequal outcomes

The first layer of digital inequality is access, but access must be understood broadly. A child may live in a household with an internet connection and still lack the device, privacy, stability, skills or support needed to learn, participate and seek help online. Socio-economic inequality is a key determinant of children's digital experiences and strongly predicts whether children have access to the internet or devices. A lack of technology or internet connection at home reduces families' ability to engage with these tools and limits opportunities to support children's learning.

The digital divide should be understood as a divide in the conditions necessary to realise children's rights, rather than simply a divide in connectivity. Meaningful access goes beyond having a connection or devices: it requires the conditions for children to participate, learn and communicate safely and equally in the digital environment.

Meaningful digital access for children requires:

- Connectivity: Reliable and affordable internet at home, in schools and in services.
- Devices: Suitable devices for learning, participation and communication.
- Skills: Digital literacy, critical thinking, privacy awareness and knowledge of their rights.
- Support: Parents, guardians, teachers and professionals equipped to guide children.
- Safety: Child-friendly, privacy-protective and non-discriminatory digital environments.
- Remedy: Accessible ways for children to report harm, seek help and obtain redress when their rights are violated.

Without these conditions, connection does not necessarily translate into the effective exercise of rights.

Roma children are among those most affected by compounded digital inequality. Poverty, discrimination and segregation limit both access and outcomes, while the digital divide further worsens educational inequalities. For children with a migrant background, digital inequality is often shaped not only by poverty but also by language barriers, weaker access to information and services, and broader forms of administrative and social exclusion. These barriers can undermine the right to information, education, participation and access to support.

According to Eurochild's members, in **Czechia**, the children most affected by the digital divide are those living in socially excluded areas. In **Croatia** and **Italy**, disparities affect children from low-income families, living in rural areas, migrant children, children with developmental difficulties and children in out-of-home care. In **Serbia**, 35% of households in Roma settlements lack internet access at home, and only 15% have computers or tablets. In **the Netherlands**, digital skills are strongly influenced by parental education. According to the Basic Education Act, in **Finland**, all learning materials, as well as the tools required for them, are free of charge. However, in practice, there are differences in the digital devices that students use, as some families can afford more advanced equipment than others. Children living in alternative care in **Flanders** reported lower access to digital infrastructure.

Although 99.8% of households with children have internet access in **Spain**, socioeconomic differences continue to condition the quality of access, the availability of personal devices and digital skills. Children from low-income families, from rural environments or in situations of vulnerability are more likely to rely on shared devices, have fewer suitable spaces for learning and find it more difficult to develop advanced digital skills.

Eurochild members highlight that, while the internet infrastructure is widespread in **Romania**, a deep divide persists because over 40% of children from rural areas lack dedicated devices for school. This gap is even more acute in Roma settlements, where up to 60% of households lack home internet access. Such disparities leave 37% of Romanian students without basic digital skills and only 0.2% at an advanced level, leaving vulnerable children digitally excluded compared to their urban peers.

In **Greece**, important inequalities remain in terms of digital skills, online safety, educational opportunities and balanced digital use. A major survey conducted by *The Smile of the Child* on anonymous chat platforms showed that 1 in 6 exchanges between minors and adults online included sexual content or inappropriate behaviour. Reported cases of abuse included pressure for sharing photos, emotional control and manipulation and attempts to move conversations to private platforms. In response, the Greek government introduced the National Strategy for the Protection of Minors from Internet Addiction in 2025.

3. Digital literacy and awareness of rights

The second layer of digital inequality is digital literacy. Children need more than technical competence: they need the knowledge and confidence to understand digital services, protect their data, recognise manipulation, seek help and claim their rights. Digital literacy is a key enabler of children's rights in the digital environment. It includes technical skills and the ability to understand how digital services operate, manage privacy and personal data, identify harmful content and online risks, critically assess information and access support and reporting mechanisms. **Children from disadvantaged backgrounds are less likely to develop these skills due to many factors, including unequal access to educational support, resources, and learning opportunities.**

Socio-economic gaps in digital skills emerge early and persist over time, and are closely linked to broader educational inequalities. This creates an outcome divide, where children from more advantaged backgrounds are better able to translate digital access into learning, participation, and opportunities.

Research shows that adolescents from lower socio-economic backgrounds are less likely to use the digital environment for educational purposes and more vulnerable to excessive gaming. They are also less likely to modify privacy settings or turn off notifications while sleeping.

Independent, regularly updated information services for children, parents and other caregivers should be provided. Building on Safer Internet Centres and trusted civil-society organisations, these services should explain the purpose, uses and key features of platforms children use, including their safety settings, contact functions, recommender systems and commercial practices. Information should be accessible, child-friendly and free from commercial influence, supporting informed choices and conversations about children's digital experiences. This support should complement binding provider obligations and guardian tools.

Digital literacy should not be limited to technical or individual security skills. It should also include critical thinking, understanding algorithms, the attention economy, data mining and disinformation. **Importantly, digital literacy should also include awareness of rights.** Children need to understand that they have rights offline and online, including the rights to privacy, protection, participation, and access to remedy. Without this awareness, children are less able to assert their rights, feel empowered or seek support when those rights are violated.

Children should also be informed about the rights they have under the EU Framework, including those enshrined in the Digital Services Act (DSA) and the General Data Protection Regulation (GDPR), as well as the General Comment 25 on children's rights in the digital environment. Good practices include the European Commission's child-friendly explanation of the Digital Services Act, available through the Better Internet for Kids platform, as well as the child-friendly version of the European Commission Guidelines on Mental Health and

Wellbeing at School, developed by the Eurochild Children's Council with support from Eurochild and the Learning for Wellbeing Foundation.

Digital literacy policies should also be shaped with children themselves, including children facing poverty, disability, migration-related barriers, discrimination or care-related disadvantage, so that education on online rights and safety reflects the realities children actually experience.

Educators themselves may need additional professional development and guidance to help shape children's digital experiences in ways that support their development. This reinforces the need to understand digital literacy not only as an individual child competence, but as something embedded in wider support systems around the child.

Crucially, digital literacy should not be interpreted as a call to increase children's screen exposure in all learning contexts. Learning should be balanced with both analogue and digital tools, and younger children should continue to learn through books, pens, paper, play and direct interaction. This is consistent with the recommendations of the [Special Panel on Child Safety Online](#), which advocates avoiding screen exposure for children aged 0–2 and supervised, time-limited, age-appropriate use for children aged 3–12, including educational use that supports digital and media literacy. [Early exposure](#) to screens can carry developmental and cognitive risks, including poorer language outcomes, while excessive screen time among school-aged children is linked to poorer educational and health outcomes. It also highlights sleep disruption as a concern across childhood and adolescence, with consequences for learning, mood, behaviour, physical health and overall development.

[Eurochild members](#) highlight key data on digital literacy. In **Cyprus**, less than half the population (49.5%) had at least a basic level of digital skills in 2023, which is below the European Union average of 55.6%, and the digital divide persists across age groups. Despite widely available internet coverage and digital services, in **Estonia**, **Slovenia** and **Turkiye**, economic barriers, lack of digital skills, inadequate inclusive solutions for vulnerable children and language gaps persist. Around 40% of 14- 15-year-olds in **Germany** demonstrate only basic digital skills, with those from low-education or migrant families particularly affected. In **Spain**, despite the high use of the internet, digital skills remain unequal. Approximately 2/3 of the population have basic or advanced digital skills. This shows that connectivity alone does not guarantee digital empowerment or the effective exercise of rights.

Romania has the [lowest rate](#) of basic digital skills in the EU (28%), meaning that many children lack the tools to exercise their online rights or to protect their privacy safely. This gap is most severe in rural areas. Digital literacy among children in **Greece** remains uneven, with significant differences by socioeconomic background, education, and parental support. While most children have access to the internet and social media for now, many lack the critical thinking and online safety skills necessary to navigate the digital world safely.

4. Family mediation

The third layer of inequality concerns the support available around the child. Parents, carers, teachers and other trusted adults play a decisive role in children’s digital lives, but their ability to provide guidance is shaped by poverty, language, time, confidence and access to services.

Digital tools can create meaningful opportunities for communication, inclusion and learning, but only where children and the adults around them receive the necessary support, guidance and resources. Otherwise, digital inequalities risk reinforcing existing disadvantage.

Research with early childhood services supporting vulnerable children found that digital tools could support stronger connections between educational settings and families, including through multilingual digital portfolios.

Adults often play a decisive role in mediating children’s digital experiences, but may lack knowledge, confidence or time to do so effectively. As shown in the VOICE Project, parents often have limited knowledge of what young children are actually doing in digital environments. At the same time, educators reported needing more strategies for working with families across home and educational settings. The home environment of a child plays a crucial role in shaping knowledge, with children not “adequately guided by adults” identified as more susceptible to online risks.

Family mediation refers to the ways parents, carers and guardians communicate with children about digital media, guide their online behaviour, monitor risks and support safe, rights-respecting use. Active mediation, talking with children about what they do online, helping them understand risks, and supporting them to seek help is especially important for building digital resilience. However, families in disadvantaged situations may have less time, confidence, language support or access to guidance, limiting their ability to provide this kind of support.

A rights-based approach should therefore support parents, carers and guardians without placing responsibility for children’s online safety solely on families. Public policy must recognise that parents’ ability to mediate children’s digital lives is shaped by working conditions, poverty, language barriers, digital confidence, housing conditions, access to services and the availability of trusted guidance. Active parental mediation such as discussing online behaviour and supervising internet use helps children develop safer digital habits while reducing exposure to cyberbullying. A rights-based approach, therefore, requires supporting parents and caregivers, particularly in disadvantaged contexts, as part of broader child protection and equity strategies.

The proposed EU KIDS Act makes these considerations particularly relevant. Guardian tools should also accommodate diverse family structures and care arrangements, including children in alternative care and unaccompanied children. Changes in care or guardianship should not disrupt children’s accounts, legitimate contacts or access to support. Tools must respect children’s privacy and evolving capacities and preserve confidential access to help.

Guardian tools should accommodate diverse family structures, care arrangements and shared parental responsibility, allowing multiple authorised carers to provide support without conflicting controls or disruption to the child's account. Specific safeguards are needed where children experience domestic violence or abuse, to prevent those tools from enabling coercive control or further harm.

In countries such as **Czechia, Poland, Romania, and Slovakia**, many children from **Ukraine** use online platforms to maintain connections with family, friends, and communities in **Ukraine**, making internet access an important source of social support and continuity. At the same time, many displaced households are headed by mothers who must balance childcare responsibilities with employment and other settlement-related demands. In such circumstances, children may spend more time online independently, which could increase their exposure to online risks and harmful content.

In **Romania**, low parental digital literacy leads to a focus on restrictive time limits rather than active guidance. This gap leaves children with little support in developing the resilience needed to navigate online rights and risks safely.

In **Croatia**, according to the results of the EU Kids Online Croatia survey, the majority of parents, 81% of them, allow their children to use the internet, but most of them do not provide support to their children in the digital environment. Thus, 46.1% of parents and guardians never talk to their children about the challenges they might face online. 41.8% never or almost never talk to their children about what they do online, and more than half of parents (51.3%) never or almost never set rules for when they can and cannot use the internet.

5. Discrimination

The fourth layer of digital inequality is discrimination. Digital environments can offer children connection, identity and access to information, but they can also reproduce and amplify the racism, antigypsyism, xenophobia, ableism, misogyny and other forms of discrimination that children experience offline.

Digital environments can provide children opportunities that may be unavailable offline, including access to communities, role models, information and support linked to their identity and experiences. However, they can also reproduce and amplify discrimination. Children who experience racism, antigypsyism, xenophobia, ableism, misogyny, homophobia or stigma offline may encounter these harms online through abusive content, algorithmic amplification, exclusionary platform design or unsafe reporting systems. Discriminatory content can be amplified because polarising and emotionally charged material often drives engagement, keeping children exposed to harmful narratives for longer. Verification measures, if not properly designed, might also risk excluding groups of children. *The Network for Children's Rights in Greece* states that, if an identification procedure is required, like the Kids Wallet, or through an ID app (like in Greece), then children from third-country nationals, or Roma children who do not possess legal

documentation, will be excluded and will not have access to social media. This action concerns the whole population, including children, and it will become a big issue if accessibility is mandatory only with legal documentation.

Digital protection measures must therefore be assessed for equality impacts. Age assurance, identity verification or parental consent tools may be introduced to protect children, but if they rely on formal documentation, national ID systems, paid devices, high digital literacy or parental availability, they may exclude precisely the children most in need of protection and participation. Protection must not come at the cost of unequal access to information, participation, support or remedy.

6. Lessons from the European Child Guarantee

The **European Child Guarantee** provides a useful framework for addressing inequalities affecting children's digital lives, even though it does not explicitly focus on the digital environment. Its objective is to ensure effective access to key services, including education, healthcare, and housing, for children in need. These services are essential for enabling children to benefit from the digital environment on equal terms.

In May 2026, the European Commission published a Communication on strengthening the European Child Guarantee as an important signal that tackling child poverty and social exclusion remains a core priority for the European Union.

We therefore welcome that the Communication links the strengthened European Child Guarantee with broader EU digital policy files, including the Digital Services Act, the forthcoming Digital Fairness Act, the revision of the Audiovisual Media Services Directive, the Better Internet for Kids strategy, and ongoing work to tackle child sexual abuse and exploitation.

The European Child Guarantee should not become a digital policy instrument in the narrow sense. Its added value is different: it can ensure that children in need are not excluded from the digital conditions that increasingly determine access to education, healthcare, child protection, housing support, participation and information. Digital inclusion should therefore be mainstreamed across Child Guarantee implementation, monitoring and funding, rather than treated as a separate or optional add-on.

National Action Plans offer examples of relevant measures, such as improving digital infrastructure in schools, providing devices to disadvantaged children, supporting home connectivity, training teachers in digital skills, promoting digital literacy programmes for children and parents and developing strategies for online child protection.

The National Action Plans and related initiatives show four types of relevant measures:

- **Digital infrastructure and devices**, including school connectivity, laptops, tablets, computer vouchers and home internet support.
- **Digital skills and teacher training**, including digital pedagogy, coding initiatives, online safety education and training for parents and educators.

- **Inclusive tools for children with additional needs**, including accessible educational and therapeutic resources.
- **Online safety and child protection**, including helplines, reporting mechanisms, school-based prevention programmes and national safer internet centres.

The following examples illustrate how digital inclusion is already appearing in Child Guarantee implementation and related national initiatives, even where it is not always framed explicitly as a children's rights issue.

- In **Belgium**, the French Community adopted a digital deployment strategy for all its schools, acquired more than 750 new or reconditioned laptops since 2020, continued investments in laptops, tablets, interactive whiteboards and digital platforms in 2022, planned digital awareness activities, and hired two digital pedagogy specialists in 2022.
- In **Bulgaria**, a digital platform for educational and therapeutic resources for children and students with special educational needs, called *Support me*, was launched in February 2022 with UNICEF.
- In **Greece**, the *Digital Care I & II* issued large numbers of vouchers for tablets, laptops, desktops and peripherals for eligible students in vulnerable situations. 506,000 vouchers were issued under *Digital Care I* and 166,000 vouchers under *Digital Care II*.
- In **Finland**, all IT equipment that is part of the curriculum is free.
- In **Ireland**, all schools now have high-speed broadband connectivity under the Schools Broadband Programme.
- In **Malta**, digital literacy is actively promoted, including through coding initiatives and the *One Tablet per Child* project. The approach also includes training for educators on digital and remote teaching, as well as free online courses available for both parents and educators. The framework is complemented by child protection measures, including the *Child Web Alert* and helpline infrastructure, which address online risks.
- In **Romania**, the Guarantee integrates the *Euro 200* program to provide computer vouchers for disadvantaged families. Supported by the Ministry of Education via National Recovery and Resilience Plan funds, the framework also includes the rollout of over 2,900 smart labs and digital pedagogy training for 100,000 teachers to bridge the rural-urban gap.
- In **Luxembourg**, there has been a huge roll-out of tablets in schools over the past few years, and many schools used them, some almost exclusively. However, in light of the latest scientific studies, the Ministry of Education reversed this and has gone back to more analogue forms of learning.
- In **Croatia**, the National Action Plan for the Implementation of the Recommendation of the Council of the European Union on the Establishment of a European Child Guarantee, as part of the measure to ensure financial support for children at risk of poverty and social exclusion, proposes to consider providing for hidden costs such as computer equipment and the Internet in distance learning, computers, etc. Also, the

Ombudsman for Children, in the upcoming period, is proposing measures to reduce digital inequality, for example, to ensure that children in families with low work intensity are provided not only with devices, but also with paid access to high-speed Internet for learning purposes at home.

The European Child Guarantee and the proposed EU KIDS Act can therefore provide complementary responses to digital inequality. While the Act would establish obligations for providers of covered services, Child Guarantee implementation can address the material and social conditions that enable children in need to benefit from those protections. Eurochild recommends explicitly linking national strategies under Article 33 of the Act to Child Guarantee implementation, monitoring and funding. This would connect digital safety and rights education with affordable connectivity, suitable devices, assistive technologies and trusted support, while preserving accessible non-digital routes to essential services.

Other best practices

Beyond the European Child Guarantee, Eurochild members and partners also identify promising practices that combine digital inclusion with children's rights, online safety, family support, education and psychosocial wellbeing. These examples show that effective digital inclusion is not only about technology, but also about trusted adults, accessible services and child-friendly support.

- In **Moldova**, the Ministry of Education and the Office of the Ombudsman delivered training for teachers on the use of digital technologies and on creating interactive and effective learning experiences. They also organised school-based activities to raise children's awareness of their fundamental rights.
- In **Spain**, through the [Daphne Child Programme](#), the Including Children Affected by Migration (ICAM) partnership has developed and successfully trialled in Spanish schools a series of 10 workshops for Children Affected by Migration aged 8-14 delivered by older students who have been coached and assessed by ICAM-trained staff in their school. The programme aims at improving the Social and Emotional Wellbeing and consequent access to education and life chances of all children. It is peer-led, risk assessed, trauma-informed, and culturally responsive, with built-in use of assistive technologies to reduce language barriers and improve learning outcomes. Additionally, a parallel programme to help parents continue to encourage safe and responsible use of the internet in the home was developed.
- In **Greece**, The Smile of the Child implements a range of prevention programs in schools aimed at protecting children from online risks. These interventions focus on early awareness, digital safety and psychological support. Actions include psychoeducational workshops on cyberbullying, safe internet use where children learn how to recognise dangerous behaviours and seek help. The Organisation also provides training sessions for teachers and parents to strengthen their ability to identify and respond to risks affecting children in the digital environment.
- In **Luxembourg**, BEE SECURE, the national Safer Internet Centre, promotes online safety through awareness-raising, training, child-friendly resources, a hotline for advice and a stopline for anonymous reporting of illegal content. Its work includes

training for children, parents and professionals and is integrated into the school curriculum.

7. Recommendations

7.1 Strengthen research on inequality and children's rights online

The EU and Member States should collect regular, disaggregated data on children's digital access, skills, safety, participation and access to remedies, including by socio-economic background, disability, migration status, housing situation and care status, in order to address current monitoring gaps in child digital well-being. Research should also examine how socio-economic background shapes the impact of specific online behaviours, including problematic social media use, on children's mental health and wellbeing.

7.2 Treat digital inclusion as a children's rights issue

Access to the digital environment is closely linked to the enjoyment of rights such as education, information, participation, and access to services. The European Child Guarantee should more explicitly be strengthened to ensure the enjoyment of a wide range of rights in the digital environment. Evidence that children from low socio-economic backgrounds may be more strongly affected by problematic social media use underlines the need for digital policy, mental health policy and child poverty policy to be better connected. Digital inclusion should be embedded in broader social policies and strategies on children's rights, including the European Child Guarantee, to address structural inequalities.

7.3 Ensure affordability and quality of access

Member States should support reliable internet access, suitable devices, assistive technologies, and safe digital learning environments for children and families in disadvantaged situations. Policies should address the quality, stability, affordability and accessibility of access, as well as children's ability to seek help and obtain remedies when their rights are violated online.

7.4 Invest in equitable digital literacy and rights awareness

Education systems and child services should support children in developing digital skills and understanding their rights, with targeted support for disadvantaged communities. This should include support for teachers and other professionals, who also need guidance to mediate children's digital experiences in ways that support development, inclusion and wellbeing.

7.5 Address offline inequalities as part of digital

Policy for children should not be limited to connectivity, devices or online safety tools. It should also address the offline conditions that determine whether children can benefit from the digital environment, including poverty, housing deprivation, discrimination,

inaccessible services, weak child protection systems and unequal access to education, healthcare and support.

7.6 Ensure corporate responsibility and safe digital environments by default

Digital platforms and technology companies should be required to apply safety-by-design, privacy-by-design and accessibility-by-design principles. Providers should demonstrate that services and features likely to be accessed by children are safe and age-appropriate. Regulatory measures should address manipulative and addictive design, including harmful recommender systems, autoplay, infinite scroll, persistent notifications, dark patterns and unsolicited contact. The burden of demonstrating safety should rest with providers, not with children and families. The EU KIDS Act should require child-rights risk assessments before covered services or features are made available to children, supported by proportionate independent review. Assessments should examine how individual and cumulative design choices affect children in different circumstances, including those experiencing poverty, disability, discrimination or limited adult support. Providers should demonstrate that safeguards are effective and accessible across these groups.

7.7 Support families and guardians

Public policies should strengthen parents' and caregivers' capacity to support children online, including through accessible guidance, community support, and digital literacy programmes. This is particularly important in disadvantaged contexts, where research shows that families may have limited knowledge of children's digital activities and face greater barriers to active mediation. Vulnerabilities of children and youth must not be exploited by the design of online spaces. Support for families should complement safeguards that operate independently of guardian involvement. The EU KIDS Act should accommodate diverse care arrangements and ensure that children without an available or safe guardian can exercise their rights and access confidential support. Guardian tools should respect children's privacy, agency and evolving capacities.

7.8 Ensure meaningful child participation in digital policy

Children, including children experiencing poverty, children with disabilities, Roma children, migrant and refugee children, children in alternative care and children in precarious family situations, should be involved in the design, implementation and evaluation of digital policies that affect them. Participation must be safe, accessible, age-appropriate and supported, and children should be told how their views have influenced decisions.

Digital policy will not protect or empower children if it treats them as though they all start from the same place. Children's digital lives are shaped by poverty, housing, disability, migration status, care arrangements, discrimination, family support and access to services. A rights-based approach must therefore go beyond connectivity and online safety tools. It must ensure that every child has meaningful access to the digital environment, the skills and support to navigate it, protection from harm and discrimination, and effective routes to remedy. The European Child Guarantee offers an important framework for this work: by

addressing the offline inequalities that shape children's digital experiences, it can help ensure that no child is excluded from their rights online or offline.

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