EPA POLICY RECOMMENDATIONS

A Card for Every Child:
EPA's Recommendations for the European Child Guarantee Card Pilot

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RECOMMENDATIONS AT A GLANCE

1) **A Card for universal services**. A universal base of publicly guaranteed services for every child, with additional support for those who need it most.

2) **No stigma by design**. The European Child Guarantee Card should look and work the same for every child, backed by clear communication to families and schools.

3) **Simple, accessible, safe**. One application valid for several years, non-digital and multilingual routes, and strong data protection.

4) **Clear rules in practice**. Settle in advance who holds the Card in separated families, and how children in care or without parents are covered.

5) **Recognised everywhere**. Build mutual recognition across Member States into the pilot from the start, learning from the European Disability Card.

6) **Funded and evaluated**. Dedicated public funding for the services behind the Card, continuity after the pilot, and an independent evaluation that includes parents' views.

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INTRODUCTION

In 2025, **19.3 million children** in the European Union, 24.3% of all children, were **at risk of poverty or social exclusion**, and the Commission itself acknowledged that progress towards the 2030 target has stalled. Growing up in poverty nearly doubles the likelihood of being poor as an adult, and childhood disadvantage is estimated to cost Europe 3.4% of GDP every year. (European Commission, 2026)

In this context, **EPA welcomes the European Commission's announcement of a pilot for a European Child Guarantee (ECG) Card**, planned for 2027 with voluntary participation from Member States (European Commission, 2026). A well-designed Card could make it easier for families to access the services their children are entitled to.

To gather more input, EPA surveyed its member organisations between 16 September and 15 October 2026, and received 136 responses from 8 countries, almost all from parents and caregivers. **Support was strong**: 66.9% of respondents agreed with the Card's implementation in their country, 29.4% answered "maybe", and only 3.7% were opposed. **Awareness, however, is low**: only 22.1% knew what the European Child Guarantee is, while 77.9% had never heard of it or were unsure what it is. Full results are available in the accompanying Survey Report.

POLICY RECOMMENDATIONS

1) **A Card for universal services**

Research indicates that universal services reach more children and tend to perform better than narrowly targeted schemes. (Department for Education pilot evaluation; Universities of York and Sheffield, 2025). In EPA's view, the Card should give children access to services such as school meals, healthcare, childcare, transport, and school supplies. School supplies, food, and healthcare were by far the services our respondents mentioned most, often linked directly to children's learning. Such services should be delivered or funded publicly, rather than providing money or vouchers to buy services on the private market. Our respondents' own experience points the same way.

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Support provided directly in kind and settled with schools or providers (such as free school meals, subsidised travel passes, and municipal help with school supplies) was generally seen as working well. An **overreliance on the private market is problematic** because the quality of what families receive becomes harder to guarantee, provision is likely to be uneven between cities and rural areas, and public money reaches private providers without the accountability expected of public services. Private and philanthropic contributions can complement public provision, but they cannot replace predictable public funding and public accountability (Eurochild, 2026; EU Alliance for Investing in Children, 2026). A Card is also only as good as the services behind it: where there are no childcare places or school canteens, it unlocks nothing. Children in poverty still face a 15-percentage-point gap in early childhood education and care enrollment compared with their peers (European Commission, 2026), so the pilot must go hand in hand with investment in the services themselves.

The Card should also be **universal by design**. As noted by several respondents, strict eligibility thresholds would leave out working parents and families just above the line, and some respondents argued directly for access for all children, complemented by additional support for those who need it most. This goes in line with the Commission's 2013 Recommendation "Investing in Children", which calls for an appropriate balance between universal policies for the well-being of all children and targeted approaches for the most disadvantaged (European Commission, 2013).

2) **No discrimination or stigmatisation**

Discrimination and stigmatisation are major potential issues, and they were the concern our respondents raised most often. They feared that **other children could identify Card holders as poor**, mainly through a visibly different Card at school or in a shop. This could lead to teasing and bullying or to children not using the Card out of shame. Some also feared discrimination against children with disabilities or from migrant backgrounds. Consistent with the aforementioned research, one respondent described a school meals scheme promoted at their child's school that was used far more by families in financial difficulty once it was opened to all children and the visible distinction between recipients disappeared. This experience is supported by research.

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Stigma, or the fear of it, is one of the main reasons why people do not claim support they are entitled to (Eurofound, 2015). When free school meals were made universal in deprived areas of Scotland, more of the families who were already entitled started using them, and anonymous payment systems had a similar effect elsewhere (Holford, ISER, University of Essex, 2013). Other evaluations of free school meals confirm the same result: when meals were offered to all pupils, more children actually ate them, including children who were already eligible but had not been using them. Extending eligibility to more families, without making the offer universal, did not achieve the same effect (Department for Education pilot evaluation; Universities of York and Sheffield, 2025). **EPA therefore recommends that the Card looks and works the same way for every child**, with a neutral appearance similar to an ordinary bank card as our respondents suggested, and that service providers do not need to know whether a child receives additional support. **Communication** and **awareness** are equally important: our survey showed that only 22.1% of respondents knew what the European Child Guarantee is. The pilot should therefore come with a clear information campaign aimed at parents, schools, and frontline services, explaining what the Card covers and how to obtain it. Respondents also asked for a transparent list of entitlements, and some warned that the Card should not duplicate existing national systems, for example where healthcare is already free.

3) **Simple, accessible, safe**

Respondents were also very worried about **administrative and digital barriers**, which matter because they keep support from those who need it most. The Commission estimates that up to 30% of families entitled to child benefits do not claim them, and that as many as one third of families do not use support such as childcare or healthcare they are entitled to (European Commission, 2026). Respondents pointed to **complex applications**, **long processing times**, **strict eligibility rules**, and **language barriers**, and warned that families with **limited digital skills**, language difficulties, or older devices risk being left behind. Families living in areas with few services face the same risk, and language barriers can easily turn into discrimination. One respondent also described a form of **"hidden poverty"**: when proof of eligibility must be resubmitted every year, or for each school trip or club, eligible families give up on services altogether.

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Families expect the Card to simplify this process, not add to it. EPA thus recommends:

- a **single application** that remains **valid for several years**, and automatic granting wherever authorities already hold the necessary data;
- **online and physical local information points** with trained staff who can help families, including in schools which families already visit every day and where the Card would be used for meals and supplies. Parents' associations can support these points by informing other parents and directing them to the staff who can help;
- **multilingual application forms** and information
- **eligibility rules that include all children** from all backgrounds;
- **a non-digital alternative** to the digital Card.

Safeguards should also be set up to protect public resources and the quality of services. Many respondents worried that goods or benefits might not reach the child, or about fraud and forged cards, and they proposed practical answers, such as settling costs directly with schools and service providers and independent audits.

EPA recommends granting access to services rather than cash, which limits the risk of misuse without casting suspicion on families. In addition, since the pilot will build on the European Digital Identity Wallet, clear rules on data protection and storage are essential. Only the data needed to grant access should be collected. Furthermore, **data should be stored securely** and for a limited time, and it should never be used for purposes other than providing services to children. This is especially important for families with insecure residence status, whose children may otherwise miss out on the Card altogether.

4) How the Card works in practice

In practice, parents or caregivers will most likely be the ones physically holding the card, especially for younger children. Furthermore, each child will have different needs based on their family situation. This raises several practical issues that the pilot should address before it starts.

- **Who holds and uses the Card?** In households with separated parents or shared custody, both parents should be able to use it for the child. The child should not need to be present every time the Card is used: for example, when purchasing school supplies, a parent should be able to use the Card on the child's behalf.

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- **Single-parent households.** Single parents should not face extra steps to apply for or use the Card, as it would penalise them unfairly.
- **Children without parents or in alternative care.** More than 700,000 children across the EU live in alternative care (European Commission, 2026). These children need a clear rule on who applies and holds the Card for them.
- **Displaced or undocumented children.** The same goes for displaced and/or undocumented children, including children living in reception centres and camps, who should not be excluded because of administrative barriers such as residence requirements.

Furthermore, some other points concern continuity:

- **Family transfer.** What happens when a family moves from one pilot country to another, or to a country where the Card is not being tested?
- **Turning 18.** Support should not stop abruptly when children turn 18: the Card should connect with Youth Guarantee to ensure a harmonised and coordinated procedure that accompanies them towards adulthood.

EPA recommends that the European Commission and participating Member States settle these questions in the pilot's design, in consultation with parents' organisations.

5) **Recognition and implementation**

The Card should be recognised across all Member States, as several respondents asked, because otherwise families who move or travel would lose access to support, and children's rights would depend on where they happen to live. The European Disability Card offers a useful lesson. It began as a voluntary pilot in 8 Member States between 2016 and 2018, and, in its own assessment, the Commission found that the pilot lacked an EU-wide dimension, which created uncertainty and unequal treatment, and that a voluntary model would likely diverge over time (European Commission). The same assessment found that the pilot had achieved mutual recognition that Member States could not have reached alone. These findings led to Directive (EU) 2024/2841, which requires Member States to issue and mutually recognise the European Disability Card across the Union (EUR-Lex). Users of the Disability Card pilot also criticised its short validity period, signalling that cards needing to be renewed often can create needless barriers (European Blind Union). In addition, since service providers joined the scheme voluntarily, the Disability Card offer depended on which providers took part in the initiative.

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EPA therefore recommends that the Card pilot be designed from the start with **mutual recognition between participating Member States**, a **clear path towards an EU-wide framework**, and a **guaranteed set of services** that does not depend on voluntary participation by providers. If what the Card offers depends on which private providers choose to join, children's access would rest on the market rather than on publicly guaranteed services, which is the overreliance on the private sector that EPA warns against in its first recommendation.

6) **Sustainable funding and independent evaluation**

The ECG Card will only be as strong as the funding behind it. The Commission itself recognises that insufficient funding limits the impact of the Child Guarantee, and that short-term, siloed projects will not bring lasting change (European Commission, 2026). EPA therefore recommends that the pilot comes with dedicated public funding for the services the Card gives access to, and not only for the tool itself. Families also need certainty about what happens when the pilot ends: no child should lose access to meals, school supplies or healthcare overnight because a project has closed. EPA supports the calls made by Eurochild and the EU Alliance for Investing in Children for predictable, ring-fenced funding for the Child Guarantee in the next Multiannual Financial Framework.

The pilot should also be independently evaluated. It should measure what matters to families: how many eligible children actually use the Card, whether children experience stigma, how much administrative effort families need to obtain it, and whether children gain better access to services than before. Data should be broken down by age, family situation and other relevant circumstances, such as disability or migration background, so that gaps are visible. The European Disability Card shows why this matters: the assessment of its pilot is what informed the Commission's proposal for a Union-wide Card, adopted in 2024 (EPRS). EPA and its member organisations are ready to help gather parents' feedback throughout the pilot, so that the evaluation reflects families' real experience.

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NEXT STEPS

EPA welcomes the Commission's initiative and is available to contribute further to the design and evaluation of the pilot. We offer our network of national and regional parents' associations to help reach families, test the Card's design with parents, and gather feedback during the pilot. We ask for the parents' and families' perspectives to be taken into account when decisions on the governance of the pilot are made. Just as the Commission consulted 41,700 children when preparing its Communication (European Commission, 2026), **parents should be consulted in a structured way before the pilot is launched**.

ABOUT EPA

Founded in 1985 and based in Brussels since 1987, the European Parents' Association (EPA) is the only European umbrella organisation exclusively representing parents, bringing together national and regional parents' associations to represent the voices and interests of families across Europe. As the only pan-European organisation dedicated exclusively to representing parents, EPA unites a diverse network of member organisations representing more than 100 million parents.

Mission. EPA empowers parents as key partners in shaping inclusive and equitable education, fostering home-school collaboration, amplifying their voices at the European level, sharing EU policy insights, connecting members, and working with NGOs and policymakers to promote meaningful change for all learners.

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