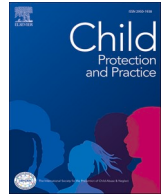




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The UN convention on the rights of the child and child development accounts: Making them work for children in institutions

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ABSTRACT

Child Development Accounts (CDAs) are an innovative public financing mechanism used to build monetary assets for a child's post-secondary education costs. CDAs are government-funded individual savings or investment accounts automatically set up for each child at birth and made available when a child turns 18. Country-specific implementation of CDAs has revealed both the uplifting economic effects on families with children as well as positive psychological impacts on children of asset building itself. CDAs must be designed to comply legally with the United Nations Convention on the Rights of the Child (UNCRC) enumeration of children's rights, including its anti-discrimination provisions, when a country is a State Party to the treaty. To align with the UNCRC, national CDA laws must guarantee three essential principles: (1) Provide for universal access for all children within a State Party country; (2) Establish progressive, public funding for CDAs, which means funds are subsidized based on need; and (3) Open the accounts immediately upon a child's birth and provide investments throughout childhood. Applying these principles will ensure that all children, including those living in institutions without family care, will have equal access to CDAs. State Parties must apply the UNCRC's legal prohibitions against discrimination to children in institutional care so that they too may benefit from the CDA method of financing post-secondary education.

1. Introduction

Child Development Accounts (CDAs) are a public financing (from taxes or other government resources) mechanism for building monetary assets for a child's post-secondary education costs (Sherraden et al., 2015). CDAs are typically government-funded individual savings or investment accounts set up for each child at birth (Sherraden et al., 2020). Permitted purposes for which the child may use the funds upon reaching age 18 vary, but many are for post-secondary education. (Huseynli et al., 2025). Accounts may earn interest or be invested but typically are not accessed before a child reaches age 18. The legal requirements and design variables for CDA models, however, vary widely. CDAs in some countries have been initially funded mainly by parent resources or a combination of parent resources and mandatory public funding. National CDAs have already been set up by law in some countries, including for example, in Kazakhstan, Singapore, and South Korea. CDA advocates articulate three essential principles for creating global CDA structures: Universal (include all children), Progressive (subsidize the disadvantaged), and Opened upon child's birth and able to receive investments throughout childhood (at least up to age 18) (Sherraden &

Zou, 2022).

Although these synergistic policy principles are essential, CDAs also must be designed to be consistent with the United Nations Convention on the Rights of the Child (UNCRC) enumeration of children's rights, including its Article 2 anti-discrimination provisions (UNCRC, 1989, art. 2). The UNCRC is a multilateral UN treaty, ratified by every nation (State Parties), except the United States. The UNCRC mobilized State Parties around a vision of the world where children are viewed as holders of their own human rights (Archard, 2015). The UNCRC defines four core principles that State Parties must apply to all rights: Non-discrimination (UNCRC, 1989, art. 2); the best interests of the child as a primary concern (UNCRC, 1989, art.3; [UNCRC Committee GC No. 14, 2013](#)); the right to life, survival, and development (UNCRC, 1989, art. 6); and the right to freely express views and be heard (UNCRC, 1989, art. 12; [UNCRC Committee GC No. 12, 2009](#)). All State Parties, including those State Parties, such as Kazakhstan, Singapore, and South Korea, which have launched CDA laws and policies, have a legal obligation to uphold these four indivisible rights ([UNCRC Committee GC No. 5, 2003](#); [UNCRC Committee General Comment No. 19, 2016](#)). This multilateral treaty also guarantees a child's right to education (UNCRC, 1989, art. 29;

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UNCRC Committee GC No.1, 2001).

Data on the number of children currently residing in institutions worldwide is emerging as part of the deinstitutionalization movement for children in care (Desmond et al., 2020). Conservative global estimates suggest that globally there are between 5 and 6 million children residing in institutions without permanent family care (Desmond et al., 2020; Goldman et al., 2020; van IJzendoorn et al., 2020). To comply with the UNCRC, these children in alternative care, including those in institutional or residential care without parental support to start or fund an individual CDA, must be included.

This paper investigates the legal and policy challenges of creating universal and progressive CDA's, which comply with the UNCRC's Article 2 non-discrimination mandate, for children living in institutions. It also makes recommendations for specific practices to ensure the inclusive participation of children in institutions. The working definition for "institution" in this context is a publicly or privately managed residential facility that does not provide a child with a family environment (van IJzendoorn et al., 2020). Temporary residential care facilities are not included. Likewise, this article does not address the UNCRC challenges of providing access to CDAs to children who may be in other forms of alternative care, such as foster care, or of including children who may be "in conflict with the law" and housed in juvenile detention facilities or prisons. Likewise, the complex issue of how to include CDAs for "children on the move" as Internally Displaced Persons (IDPs) or refugees or asylum seekers, regardless of a child's status as an unaccompanied minor, is outside the scope of this article. The focus is on how to ensure children in institutions have CDA access.

2. Overview of child development accounts

CDAs are subsidized savings or investment accounts for children to accumulate assets for long-term developmental purposes, such as paying the costs of post-secondary education or career training (Sherraden et al., 2015; Sherraden et al., 2016). The legal frameworks for national CDA's vary among the countries that have initiated CDAs. For example, to ensure universal coverage, each child at the time of birth registration is automatically also enrolled in an individual savings or investment account in their name (Clancy et al., 2015). The children receive a CDA regardless of their parents' willingness or financial capacity to establish the CDA. The initial CDA asset for each child depends on the resources of a national government to fund the accounts. The national government may use private banks or public entities like those used to hold other long-term assets, such as social security or pension funds, to administer the CDA accounts.

The CDA may accumulate interest or investment earnings over the long-term, so that the child's "nest egg" is increasing in value. In the ideal model, the national government continues to invest additional amounts in the CDAs after their inception with progressive subsidies for children with disadvantages, such as lack of parental care and placement in an institutional setting. Parents may or may not be allowed to infuse the CDA with additional funds. Once a child reaches age 18, he or she may access the CDA and use the funds for one of the designated purposes identified by law. These purposes include using the funds for post-secondary education or training, for housing, or other security needs. It is estimated that CDAs have reached over 30 million children globally (Zou & Sherraden, 2025).

3. Benefits of child development accounts

Evidence-based research on CDAs has revealed both the uplifting economic effects on families with children as well as positive psychological impact on children of asset building itself (Sherraden & Stevens, 2010). For example, on psychological effects, studies have shown that asset ownership can improve children's health conditions, advance school outcomes, and decrease the incidence of child labor (Chowa et al., 2010). CDAs can positively and significantly affect the

social-emotional development of children (Huang, Sherraden, Kim, & Clancy, 2014). CDAs influence parental attitudes, behaviors, expectations, and involvement, and these in turn positively affect child development (Huang, Sherraden, & Purnell, 2014). Preliminary findings show that having assets for a child's post-secondary education may increase parents' high educational expectations for the children; promote a child's own mental health; and improve parenting practices and parent-child interactions (Huang et al., 2021). Some qualitative research, based on interviews with youth with CDAs, indicates they have increased fiscal prudence and a future orientation that helps them to imagine a positive future with educational or occupational options (Scanlon & Adams, 2006).

CDAs started out in the United States over 20 years ago and are sometimes called Individual Development Account (IDAs) (Huang et al., 2021). Several U.S. States initiated IDA's, giving parents an option to fund and save for a child's future education by setting up an early savings account (Zou et al., 2015). For example, the Oklahoma Saving for Education, Entrepreneurship, and Down payment experiment (SEED OK) is the first test of the at-birth, universal, automatic, and progressive CDA policy as originally proposed in Sherraden's ground-breaking book—*Assets and the Poor: A New American Welfare Policy* (Sherraden, 1991). SEED OK is an ongoing, longitudinal, multimethod, randomized experiment of a universal CDA program in a full statewide population to find out long-term outcomes for children of owning a CDA. (Huseynli et al., 2025). Children in the treatment group received a CDA that included a state-owned account opened at birth, an initial deposit, and incentives to encourage deposits from their families. Children in the control group did not receive this CDA intervention (Huang et al., 2021). The SEED OK model shows that a CDA program can be universal and progressive if initial accounts and deposits are provided to all children automatically (Clancy, Beverly, Schreiner, Huang, & Sherraden et al., 2021).

The SEED OK experiment, started in 2007, uses probability sampling from a full state population, random assignment to treatment or control groups, and a longitudinal survey, to examine the impacts of a CDA program over time (Nam et al., 2013). A recent study of SEED OK data found that CDA long-term impacts include positive effects on both parental expectations and college preparation (Sun et al., 2025). The study showed that mothers in the treatment group (with CDA intervention) were more likely to maintain educational expectations and more likely to prepare for a child's college education (Sun et al., 2025). The SEED OK experiment is the most rigorous and longest running test of a U.S. statewide CDA program (Sherraden et al., 2020; Sherraden et al., 2025).

CDAs are significantly different from another type of savings' plan for college education, referred to in the United States as 529 plans. A 529 plan is typically sponsored by a U.S. State and is designed to permit families to save their own funds for post-secondary education in an account for a beneficiary child with benefits such as tax-free growth and tax-advantaged withdrawals for qualified education expenses. Unlike a CDA, a 529 account is usually a voluntary, individual option that does not include the State's automatic enrollment of all children. Also, a 529 account initial investment is funded solely by a family's private resources and typically receives no contributions from the U.S. State over the life of the 529.

4. Country examples of CDAs

There are very few countries that have enacted CDA laws. Three countries—Kazakhstan, Singapore, and South Korea—were selected as examples because they have national programs that align with the goal of covering all children at birth with equal access to progressive CDAs. Even though it is only a local pilot program, Uganda was added to give an example of an experimental, African-based program.

Kazakhstan. The Kazakhstan government launched a CDA program in 2024 (Huseynli & Sherraden, 2025). The state educational savings system, which encompasses the CDAs, is known in Kazakhstan as the

Keleshek Law [Future] program. The Law of the (Republic of Kazakhstan Law No. 153-VIII of January 10 2025,) established the program, and it entered into force on March 10, 2025. Most of the amendments made by the 2025 *Keleshek* Law applied to the 2013 Law of the Republic of Kazakhstan on the State Educational Saving System. The amended and consolidated version of this law is the main legal act regulating the *Keleshek* program (Republic of Kazakhstan Law No. 67.V of January 14, 2013). This legislation obligates the Republic of Kazakhstan to open a CDA (referred to in the law as an educational savings account) for each Kazakhstani child when the child becomes five years old and make a one-time deposit to the account using the national budget funds. These CDAs for individual children may be opened at any Kazakhstani financial or insurance organization authorized to perform investment operations. The *Keleshek* program is aimed at creating savings accounts so that a child may later use the accumulated funds for undergraduate and graduate levels of education. If a student decides to study abroad, this money can be paid for his or her foreign education. If the money is not spent on a college education, it can be used for vocational or other training, transferred to another person, used to purchase a primary residence, or otherwise to improve a youth's living conditions.

The Kazakhstan National Fund for Children (with 50% of the fund's annual investment income coming from natural resources revenues) will allocate funds to CDAs (Huseynli & Sherraden, 2025). The Kazakhstan National Fund for Children enrolls all citizen children under age 18 and guarantees automatic government deposits at start-up and then on an annual basis (Huseynli & Sherraden, 2025). Families or children are not allowed to withdraw funds until they turn 18. (Huseynli et al., 2024). Funds may be used for up to 10 years after the beneficiary reaches age 18, enabling education or housing costs to be covered through the formative young adult years. (Huseynli & Sherraden, 2025). The government's return on capital is transferred to CDA participants, and funds are held in U.S. dollars. Kazakhstan is the first country in the world to allocate half its national (sovereign) fund, which includes the financial benefits from the use of the country's natural resources, for investments in children (Huseynli et al., 2024). As of 2025, the total number of CDA account holders was 6,921,035, and the total amount accrued for CDA's was \$889 million (Huseynli & Sherraden, 2025). Kazakhstan's law and strategic policy development for nationwide CDAs is consistent with CDA experts' recommendation that an evidence-based, asset building plan could be created and linked to a country's oil and gas revenues or other natural resource revenues so that children have some saved funding for post-secondary education (Huseynli, 2023).

Singapore. Singapore established one of the first CDA policies in the world, and its integrated system of asset building to support a child over the course of all development stages is unique. Singapore has four asset-building accounts for children: Edusave, Baby Bonus/CDAs, Post-Secondary Education Accounts (PSEAs), and Medisave for newborns (Loke & Sherraden, 2019). For the CDAs, parents sign up via a simple opt-in system online when a child is born, and for other benefits, such as Edusave, PSEAs, and Medisave, the account is automatically opened upon birth registration or at the relevant age (Singapore Child Development Co-Savings Regulations, 2003; Loke & Sherraden, 2019; Singapore Child Development Co-Savings Act of 2001). As part of the first-tier funding, a substantial, unrestricted lump sum, depending on the birth order of the child, is placed in a bank account designated by the parents. As part of the second tier, a CDA restricted savings account is opened for the child with government funds. Family contributions to the CDAs are matched by the government until the child turns 12. (Loke & Sherraden, 2019). For example, depending on the birth order of the child, an initial grant may range from approximately US\$3860 for the first and second children and about US\$7720 for the third and subsequent children (Singapore Child Development Co-Savings Regulations, 2003; Singapore Child Development Co-Savings Act of 2001). If the parents deposit savings in the CDA, the government will match the amount deposited up to the permitted maximum co-matching amount.

To encourage building assets for a child's post-secondary education,

any balances from the CDA and related savings accounts are automatically transferred, when a child turns 13 and 17 to a PSEA (Loke & Sherraden, 2019). Like CDAs, PSEAs receive additional government top-ups periodically, and funds in the PSEAs earn interest of at least 2.5% annually and can be used for approved post-secondary education purposes (Loke & Sherraden, 2019). Overall, Singapore's CDA's and other benefits are a comprehensive approach to making financial provisions for the development of children throughout their life cycle that includes more than funding for just post-secondary education. The purpose of each type of benefit varies, ranging from supporting families and investing in children to increasing birth rates (Loke & Sherraden, 2015).

South Korea. The South Korean Ministry of Health and Welfare (MHW) started a CDA policy in 2007 to boost birth rates and facilitate accumulation of assets for children's future use (Chang-Keun, 2020). The South Korean government established a CDA program, known as the *Didim* Seed Account, to help children aging out of care, including those children who were in institutions. (Korea Child Welfare Act, Act No, 19554, 2023). The children who are eligible for the *Didim* Seed Account now include the following:

- Children in foster care, child welfare facilities, welfare facilities for people with disabilities, or other health and welfare facilities;
- Children in households composed of only minors because of the death or desertion of parents;
- Children from families that are already entitled to public assistance (Korea Child Welfare Act, Act No, 19554, 2023; Korea Enforcement Regulations of the Child Welfare Act, MHW Decree No.150, 2012).

One of the main goals of the *Didim* Seed Account is to provide a financial bridge for children who are aging out of the child welfare system and have no resources for education, training, or housing (Korea National Center for the Rights of the Child, 2025). The MHW entrusts the management of the financial assets for the CDA program to licensed banks and cooperatives (Korea Child Welfare Act, Act No, 19554, 2023). The program allows parents to opt into the CDA program and does not have an automatic enrollment feature. Each child has two accounts: a savings account that receives deposits from parents or sponsors and a separate account that receives matching funds from the South Korean government. Donor sponsorships of CDAs from the civil sector are possible in South Korea, and children living under the care of the child welfare system may receive a general sponsorship from outside donors; children may use the funds for living costs, education fees, or savings in their CDA account. (Chang-Keun, 2020). There is also a CDA-designated sponsorship that is solely for deposits in CDAs for specific children (Chang-Keun, 2020). Upon turning 18, children are authorized to withdraw funds from both accounts for post-secondary education and other major life events. Proponents of CDAs have advocated for the expansion of the Korean CDA program so that it provides universal access to all children, not just to those in the child welfare system or children in poor families (Sherraden, 2020).

Uganda. Although not a country-wide CDA program, there have been randomized control trials (RCT's) conducted in Uganda on the impact of a CDA asset-based intervention on academic performance and primary-to-secondary school transitions among children orphaned because of HIV-AIDs (Proscovia et al., 2019). In Uganda, under a 5-year (2011-2016) RCT, funded by the National Institute of Child Health and Human Development, orphans and vulnerable children (OVCs) received an intervention that included a matched savings account, a mentorship program, and financial planning assistance along with micro-enterprise development workshops. (Proscovia et al., 2019). Results showed that OVC's receiving this intervention performed better on Uganda's national standardized examination administered to all students completing primary school and had higher odds of transitioning to secondary or vocational school than their counterparts in the control group (Proscovia et al., 2019). In this program, the accounts were seeded with

a small initial deposit, and the families and youth included were encouraged to save for secondary education, and for a limited time, any personal savings were matched with between US\$10 and US\$20 per month. The study findings showed that the matched savings account intervention, along with the other components, such as the financial planning assistance, improved OVC's academic performance and reduced their economic barriers blocking primary to secondary education transitions (Proscovia et al., 2019). This CDA-like, multicomponent intervention provided a sense of economic security through the matched savings account and thus gave the OVCs included a sense of hope to complete primary school without economic constraints, enabling them to achieve higher academic test scores and envision a transition from primary to secondary education (Proscovia et al., 2019).

5. Convention on the rights of the child legal requirements

Countries that have ratified the UNCRC must follow it. This means that their national laws, policies, and programs—including social protection programs like CDAs—must respect children's rights. Some rights must be put in place right away, such as the right to non-discrimination (Article 2). Other rights, like the right to education (Article 29), can be achieved over time as resources allow.

The United Nations Committee on the Rights of the Child (UNCRC Committee) checks whether countries are meeting these responsibilities. Governments must regularly report on what they are doing. The UNCRC Committee reviews these reports and gives recommendations, called Concluding Observations, to highlight progress and areas needing improvement.

The UNCRC also publishes General Comments (GCs), which explain how specific rights should be understood and applied—for example, the child's best interest, the right to be heard, and the right to education. It meets regularly in Geneva to review countries' progress. (United Nations Human Rights Treaty Bodies, 2025). Countries are also expected to follow other UN guidance, including the UN Guidelines on the Alternative Care of Children (General Assembly, 2010).

The UNCRC Committee also issues decisions under the U.N. Optional Protocol on a Communications Procedure (OPIC). It applies rights in individual cases when State Parties have ratified both the UNCRC and OPIC (UN OPIC, 2011). Children themselves may lodge complaints directly against State Parties for UNCRC violations if a national legal system has failed to address a violation (Egan, 2014). A child or children may also receive case-based, effective remedies for violated rights (Liefard, 2019).

UNCRC Article 2—The Right to Non-Discrimination and its impact on CDAs is the focus of this article. UNCRC Article 2 does not define in text what is meant by 'discrimination,' and there is no GC on Article 2 (Besson & Kleber, 2019). There has, however, emerged a consensus that discrimination in the field of children's rights means a difference of treatment in similar situations or similar treatment in different situations, without regard to whether the discrimination was intentional (Lainpelto, 2023). Article 2 provides:

"1. States Parties shall respect and ensure the rights set forth in the present Convention to each child within their jurisdiction without discrimination of any kind, irrespective of the child's or his or her parent's or legal guardian's race, color, sex, language, religion, political or other opinion, national, ethnic or social origin, property, disability, birth or other status.

2. States Parties shall take all appropriate measures to ensure that the child is protected against all forms of discrimination or punishment on the basis of the status, activities, expressed opinions, or beliefs of the child's parents, legal guardians, or family members. (UNCRC, 1989, Art. 2)."

Child rights experts, under the auspices of the UNCRC Committee, have identified Article 2 'core attributes,' defined as a key dimension of a human right and set up a platform of indicators to standardize and monitor a country's compliance with each UNCRC article (Global Child

Platform, 2021). The seminal compliance manual—*Monitoring State Compliance with the (U.N. Convention on the Rights of the Child) Article 2's three core legal attributes* as:

- Non-discrimination in the realization of all rights for all children within the jurisdiction.
- Non-discrimination on the basis of status, actions, or beliefs, of parents, guardians, or family members.
- Special measures to address discrimination (Lansdown, 2022).

6. Convention on the rights of the child application to CDA policy

Overall, UNCRC Article 2's core attributes mandate non-discriminatory, equal access to CDA's for all children within a State, regardless of the child's race, sex, national origin, religion, disability, or status in other protected categories. Children living in institutions, where a child may not have permanent family contacts to fund a CDA, may not be excluded. The CRC Committee has explicitly stated that discrimination against the child on the basis of the parent's status violates Article 2 (Lansdown, 2022). So, for example, the Singapore CDA provisions that originally excluded "out of wedlock" children would not comply with the UNCRC.

A State Party also has an affirmative duty to undertake special measures for institutionalized children that are necessary to guarantee their inclusion in CDA's (UNCRC, 1989, Art. 2; Lansdown, 2022). For example, State Parties may move vulnerable children in and out of institutions, depending on the child's family's situation. These moves will need to be tracked individually via child protection systems so that a child's specific CDA may be available when the child reaches age 18. The State Party may well need to include special measures, such as hiring additional social workers to identify and track children who are moving in and out of institutional care. These social workers would need to maintain a data base that shows when a child is "graduating" from care at 18 and would be eligible for payment from his or her CDA account.

Also, UNCRC Article 20(1) states: "A child temporarily or permanently deprived of his or her family environment, or in whose own best interests cannot be allowed to remain in that environment, shall be entitled to *special protection and assistance* provided by the State." (UNCRC, 1989, Art. 20(1)). Thus, other UNCRC text makes clear that children living in institutions outside of family care are entitled to special protections to ensure their equal access to CDAs, so that like children in families, they may use this resource for post-secondary education or other purposes as permitted by the State Party's laws. To comply with Article 2 and 20(1), each State Party with a CDA policy will need to include special measures for guaranteeing easy CDA access for children who exit institutional care.

CDA experts have long advocated three essential, policy principles for creating global CDA structures: Universal (include all children), Progressive (subsidize the disadvantaged), and Opened automatically upon child's birth and receive investments throughout childhood (at least up to age 18) (Sherraden & Zou, 2022). UNCRC text reveals that each one of these policy principles is also legally required. State Parties that enact CDA legislation shall ensure the program is universal, progressively funded, and provides for automatic opening of CDAs upon the birth of a child to comply with the UNCRC.

Specifically, universal access as a policy goal for CDA's is legally mandated by CRC's Article 2 (1)'s provision against discrimination based on a child's inclusion in a particular social group, such as placement in an institution. Similarly, UNCRC's Article 2(2) attribute that prohibits discrimination against children based on the status of their parents dictates that CDAs be funded progressively, so that children without parental care in institutions may be granted the same CDA financial benefit that is provided to non-institutionalized children. Finally, the policy goal of automatic registration of all children at birth in a CDA program is needed because equal access for all children is unlikely if a

child in an institution has no available parents or caregivers to enroll the child in a CDA at birth. In summary, universal access, progressive funding, and automatic CDA registration at birth are key components of a UNCRC Article 2-compliant CDA legal and policy framework.

7. Implementing UNCRC-compliant CDA practices for children in institutions

CDA design variables need to be crafted to ensure inclusion of children in institutions to comply with UNCRC Article 2. In most regions, substantial numbers of children still end up in institutions, and the magnitude of the problem only increased during COVID. In 2025, UNICEF data showed that there were 96 children in residential care per 100,000 children worldwide based on national surveys and social service administrative records. (UNICEF, 2025). Other conservative global estimates suggest that there are between 5 and 6 million children residing in institutions (Goldman et al., 2020; van IJzendoorn et al., 2020). However, just counting the children in institutional care in specific countries remains challenging leading to significant data gaps (Cappa et al., 2021). Overall, the available data on children in institutions indicates that the scale of the problem and the urgency needed for addressing the challenges of eliminating institutional care remain formidable (Desmond et al., 2020).

Additionally, one real-time global minimum calculation for the time period of March 1, 2020, to October 31, 2024, of the number of children affected by COVID-19-associated orphanhood and caregiver death estimated that globally 5.2 million children lost a parent or caregiver as a result of approximately 5.0 million COVID-19 deaths (Unwin, Hillis, & Cluver, 2022). Children experiencing COVID-19-associated deaths of parents or caregivers are at greater risk of family separation and institutionalization (Hillis et al., 2021). Increased global associated orphanhood and caregiver deaths for children from COVID-19 are likely to eventually increase the numbers of children in institutional care unless programs for family-based alternative care are created to provide non-institutional options for this population (Hillis et al., 2021).

Given these numbers, children exiting institutions at 18 will likely be a substantial minority group to include with global CDAs. The hope of human rights defenders for children is that institutional care will be eliminated and replaced with family-based care (Goldman et al., 2020). Unfortunately, due to emerging threats to families, such as the loss of parents and caregivers to COVID-19 and HIV-AIDS, the population of children in institutions can expand. State Parties are attempting to reduce the use of institutional care to comply with the UN Guidelines on Alternative Care for Children (General Assembly, 2010). But the inconsistent progress in most countries in creating functional child welfare systems—which support family reunification programs and alternative care options such as foster care and adoption—is obvious given reliable global data showing 5 to 6 million children still in institutions.

CDA practices must specifically address the potential unequal impact on children in institutions so that State Parties are following the UNCRC Article 2 legal prohibitions against discrimination. Here are the practice steps necessary to undertake so that children in institutions have non-discriminatory access to CDAs:

7.1. Objective 1: create foundational structures to ensure universal, equal access to CDA programs

- A comprehensive child rights impact assessment (CRIA) must be completed that includes checking each CDA policy variable for the risk of discriminatory impact on any subset of children. (Payne, 2019). For example, children in institutions typically move in and out of public care, sometimes back to their families. A CRIA may reveal that sophisticated tracking systems for administering CDAs for a child regardless of his or her placement over the course of 18 years must be included as part of a CDA roll-out. A CRIA completed before

a State Party enacts legislation establishing a CDA program could reveal any potential negative outcomes of this intervention on specific sub-groups of children, such as children in institutions, and mitigating measures could be integrated into the CDA laws.

- CDA programs must include automatic, at birth, enrollment systems for all children, but especially for institutionalized children, so inclusion is not dependent on the capacity of parents or caregivers to register a child for a CDA. However, at-birth CDA enrollment for every child is highly dependent on a State Party having comprehensive birth registration systems. UNCRC Article 7 already does require that State Parties extend free, immediate, compulsory, and accessible birth registration to all children (UNCRC, 1989, Art. 7). UN Sustainable Development Goal (SDG) Target 16.9—Provide legal identity for all including birth registration—also mandates universal birth registration (U.N. General Assembly Res. A/70/1. Sept. 25, 2015). Yet the dream of comprehensive birth registration systems is not yet a reality in all countries. State Parties will need to continue to make progress on creating comprehensive birth registration systems so that there is a foundation for obtaining identity documentation for automatically registering a child for both a birth certificate and a CDA in the child's name.

7.2. Objective 2. Establish budgets and appropriations to progressively fund CDAs

- Both a short-term and long-term public budget for costing all the CDA investments, such as the initial deposits into a child's account at birth and then the ongoing progressive additional funds for all children, must be completed. Under UNCRC Committee's GC No.19 on public budgeting, a State Party is required: “[T]o address inequalities among children by reviewing and revising relevant legislation, policies and programmes, by increasing or reprioritizing certain parts of the budget, or improving the effectiveness, efficiency and equity of their budgets.” (UNCRC GC No. 19, 2016). For CDAs to be financially progressive, the public budgeting must consider that all families will not have equal finances to contribute to a child's CDA up to age 18. Children in institutions typically lack direct parental financial support—either to initially invest in a CDA or add ongoing tranches of funds. State Parties will need to appropriate public budgets to subsidize CDAs so that inequalities are minimized for children in institutional care.
- State Parties must set up financial entities or work with existing banks to create safe and reliable institutions and organizations that will hold and account for the CDA asset for every child in the country. State Party oversight of these financial entities and banks is essential, and thus robust laws and regulations for these entities must be enacted and enforced to protect CDAs from fraud and abuse. CDA accounts usually earn interest, and others may also provide investment options. These financial institutions need to be strongly regulated so that the children's funds are preserved without the ability of fund managers to misappropriate the CDA accounts.
- Non-State Party funders, such as multilateral, bilateral, non-governmental organizations (NGOs), and private sector entities are also proposed as potential donors for subsidizing the balances in individual CDA accounts; however, these donors need to be regulated so that their contributions enable State Parties to comply with the CRC Article 2 non-discrimination provisions. For example, if such non-public funders are used to fulfill State Party obligations to fund CDA accounts, then specific legal provisions that govern their actions will need to be adopted so that their donations do not exclude children residing in institutions.

7.3. Objective 3: Adopt special measures for children in institutions to benefit from CDAs

- Children in institutions may or may not have family members who can oversee and monitor a CDA account on the child's behalf. Identifying individual guardians in lieu of unavailable parent/s (due for example to death, abandonment, or removal of a child for abuse/neglect) could be challenging. Thus, provisions that permit children with evolving maturity to have information on their own accounts and the agency to manage and access accounts also need to be included to comply with UNCRC Article 12-A Child's Right to Participation (UNCRC, 1989. Art.12; UNCRC GC No.12, 2009).
- CDA laws define the purposes for which the asset may be used when a child turns 18. The typical purpose is for post-secondary education and vocational training. However, the assumption that children who have spent years in an institution will emerge emotionally and intellectually ready at age 18 for post-secondary education is idealistic, given the overwhelming evidence-based research on the detrimental effects passed onto children who age out of institutions (Goldman et al., 2020; Nelson et al., 2007; van IJzendoorn et al., 2020). A flexible purpose, which does not necessarily focus solely on post-secondary education/training, is needed for children "graduating" from institutions. CDA assets could also address the myriad unmet needs children face, such as for housing or supplemental catch-up learning options, as they are emancipated from institutional care (Fernandez-Simo et al., 2023).
- State Parties should also sign onto the recently released *Global Charter on Children's Care Reform*, that advocates for ongoing efforts to progressively end the use of institutions for children (United Kingdom Foreign, Commonwealth & Development Office, August 2025) and stresses the need for governments to provide financial and educational support to care leavers (children over 18) so that they may make successful transitions to independent living in the community. CDAs for children in institutions, especially to springboard their emancipation, could be a component of complying with the *Global Charter on Children's Care Reform*.
- Similarly, State Parties should provide supplemental educational programs to children while they are in institutions so that when they reach 18 and are emancipated, they may successfully use their CDA for post-secondary education. While residing in an institution, a child's immediate needs for nutritious food, health care, and primary and secondary education frequently are not met, and these deprivations have a multitude of negative effects on a child's brain development (Nelson et al., 2007). So, there is a need for concurrent programs to support CDA holders in institutions, including access to financial management training, supplemental academic assistance, and mental health services from clinical social workers.

8. Conclusion

CDA advocates have been consistent in pushing for CDAs that are universal, progressive, and opened automatically for a child at birth. This article has analyzed these policy goals and described country specific examples of CDA approaches for Kazakhstan, Singapore, and South Korea. To support these policy goals, this paper has explored the legal principles in the UNCRC's enumeration of children's rights, especially its anti-discrimination provisions (UNCRC Article 2), to determine if CDA policy goals may be bolstered with CRC legal mandates and concludes that Article 2 does legally require State Parties to create CDAs that are universal, progressive, and opened automatically at birth. This conclusion also means that State Parties must apply the UNCRC's Article 2 prohibition against discrimination to the situation of children in institutional care to ensure that their special needs are addressed so that they too may benefit from access to post-secondary education. Hopefully, UNCRC legal and policy requirements along with the practice recommendations articulated in this article will create a roadmap for State

Parties to follow when crafting the legal framework to implement CDAs nationally so that all children in a country, including children in institutions, have equal access to their individual CDA when they turn 18.

Declaration of competing interest

The authors declare that they have no known competing financial interests or personal relationships that could have appeared to influence the work reported in this paper.

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