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Beyond the Click: Governing Childhood in the Digital Age in Bosnia and Herzegovina

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1. Executive Summary

Children's lives are increasingly shaped by digital technologies. While digital technologies create important opportunities, such as new ways to communicate, learn, or share experiences, they also expose children to risks. Some risks are digital extensions of offline harms, such as bullying, violence, or harassment, while others are inherent to the digital sphere, including deepfakes, data privacy violations, and algorithm-driven content.

In Bosnia and Herzegovina, the vast majority of children engage with the internet on a daily basis, spending several hours on social media and streaming platforms.¹ Bosnia and Herzegovina's highly decentralised post-Dayton governance structure produces fragmented responsibilities and uneven practices across entities and cantons. These challenges are compounded by uneven digital literacy levels among both children and adults, as well as generational gaps that leave many children insufficiently supported in navigating online risks.

This report examines to what extent children's rights in the digital environment are currently protected in Bosnia and Herzegovina, using the UN Convention on the Rights of the Child and its General Comment No.25 as normative frameworks. Based on desk research, interviews, legal analysis, U-Report data, and a comparative review of practices from Montenegro and Croatia, the report analyses four thematic areas: online risks and emerging trends, digital literacy and support systems, governance and institutional frameworks, and inclusion and equity. It identifies key governance and protection gaps and proposes recommendations to strengthen children's digital rights in Bosnia and Herzegovina.

Key Findings

1. Online Risks and Emerging Trends

Finding 1. Risks are becoming less visible and harder to detect

The **migration of harm into private digital spaces** makes risks invisible for parents and adults. Through the opacity of algorithmic systems that shape the content that children and

¹ UNICEF Bosnia and Herzegovina (2025), *Situation Analysis of Children and Youth in Bosnia and Herzegovina*. UNICEF BiH, p. 45.

youth encounter online, **risks are becoming harder to detect, anticipate, and address** through existing prevention and protection approaches.

2. Digital Literacy and Support Systems

Finding 3. Uneven and insufficient digital literacy education limits children's ability to navigate online risks and benefits from their opportunities

The **absence of a mandatory and standardised digital literacy curriculum** creates significant gaps in children's digital competency, which can be compounded by the fragmented and inconsistent structures in schools.

Finding 5. Existing support systems are fragmented, reactive, and underused

Existing support systems remain insufficiently visible, accessible, and preventive. Only 1% of surveyed children and young people reported ever using a helpline. As a result, this can indicate a lack of sufficient access to adult guidance or professional support, leaving the majority of children to navigate online harms either alone or relying on peers.

3. Institutional Frameworks and Governance

Finding 7. Bosnia and Herzegovina's governance framework for children's digital rights remains fragmented and reactive

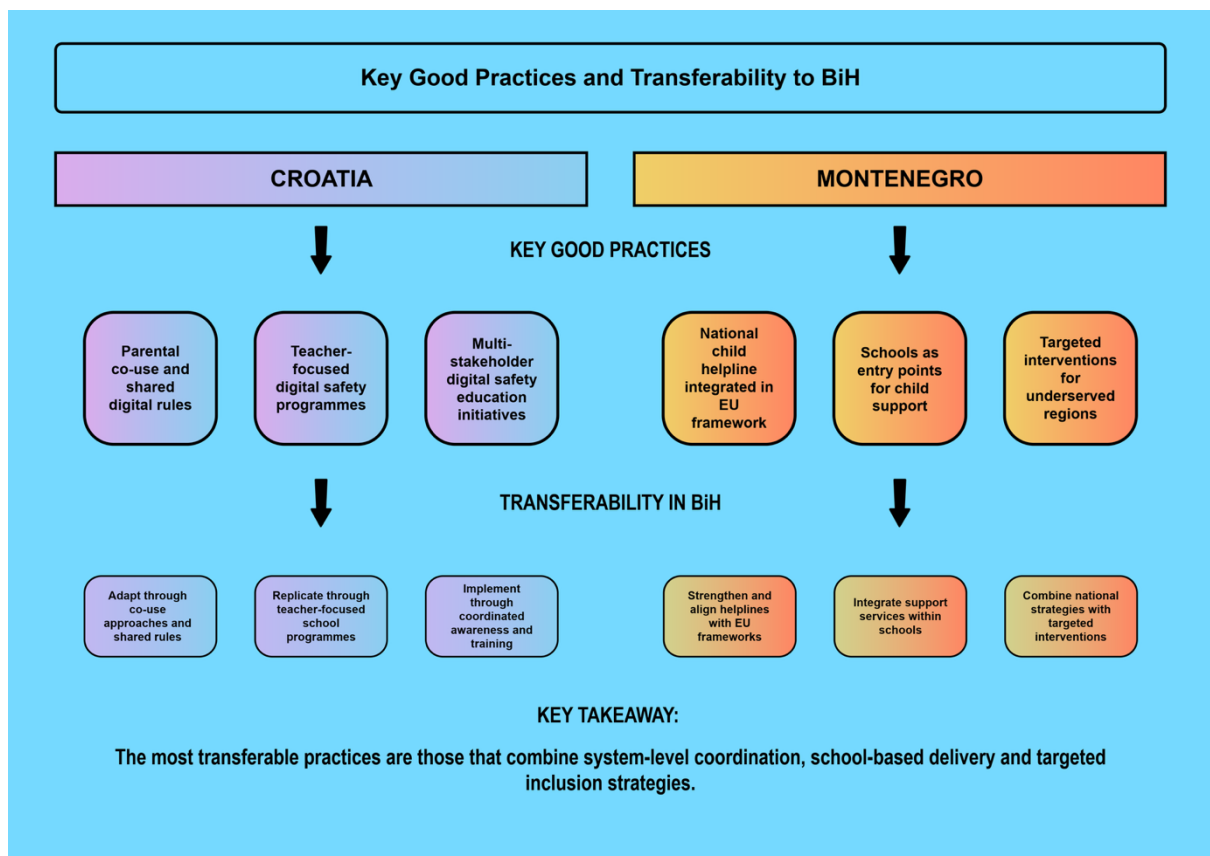
Fragmented governance and unclear institutional responsibilities weaken coordinated responses to children's digital risks. Legal and institutional frameworks were not designed to regulate digital platforms or address children's participation in digital spaces, creating a legal grey zone. **Consequently, prevention and support often rely on individual initiatives and willingness to act rather than coordinated institutional systems.**

4. Inclusion and Equity

Finding 9. Gender disparities remain insufficiently recognised in digital environments

Girls and boys do not experience the digital environment in the same way. They face different risks, encounter diverse types of content, and are exposed to different forms of algorithmic pressure. However, **gender has not yet been systematically integrated into how digital inequality is understood and addressed by stakeholders.**

Figure 1: Key Good Practices from Montenegro and Croatia



Key Recommendations

1. Strengthen governance and coordination for children's digital rights

Establish a more coherent and accountable governance framework to address fragmentation and clarify institutional responsibilities across sectors and levels of government.

2. Establish a BiH-wide coordinated digital competency framework

Move from fragmented initiatives toward a system-wide approach to digital literacy that equips children, educators, and caregivers with the skills needed to safely and meaningfully engage in the digital environment.

3. Strengthen child protection systems in the digital environment

Enhance the accessibility, visibility, and effectiveness of formal protection mechanisms, with a stronger focus on prevention and early support.

4. Ensure equitable access and inclusion in the digital environment

Address structural inequalities that affect children's ability to safely access and benefit from digital opportunities and protection.

5. Strengthen engagement with the private sector to protect children's digital rights

Promote shared responsibility for children's digital safety by engaging private sector actors, particularly telecom providers and digital platforms.

6. Promote a coordinated BiH-wide approach to awareness and engagement

Move beyond ad hoc campaigns toward a sustained, system-wide approach to raising awareness and building trust among children, parents, and educators.

2. Introduction

2.1. Global Trends

The rapid expansion of digital technologies has reshaped children's lives worldwide, creating new opportunities for learning, communication, and self-expression, alongside exacerbating significant risks to privacy, safety, and mental health. Safeguarding children's digital rights is consequently becoming a central priority on the international agenda.

While children widely regard internet access as a fundamental right, many remain excluded by barriers of affordability, infrastructure, language, gender, and disability.² Yet, those who do access it face additional challenges: opaque terms-of-service and pervasive data harvesting expose them to privacy violations, parental and government surveillance, and security threats such as hacking and identity theft.³ These issues are compounded by the fact that most children also lack formal digital literacy training, which limits their capacity to navigate these risks independently and engage safely and meaningfully in the digital world.⁴

The digital sphere nonetheless offers children benefits, amplifying platforms for identity exploration and connection to new communities.⁵ Yet harassment, cyberbullying, and discrimination remain widespread, and the broader shift toward screen-based leisure exacerbates these vulnerabilities.⁶ As such, children worldwide are calling for a digital environment that guarantees access, privacy, reliable information, safe expression, and health-supportive resources.⁷ Meeting these demands requires coordinated action and accountability from governments, technology firms, parents, and educators alike.

2.2. International Frameworks on the Rights of the Child in the Digital Environment

This report takes the UN Convention on the Rights of the Child (CRC) and General Comment No.25 (2021) as its normative benchmark. Adopted amid the proliferation of smartphones, social media, and online learning tools, General Comment No.25 clarifies how the Convention's provisions apply in the digital environment and guides States on fulfilling their

² 5Rights Foundation. "Our Rights in a Digital World." *5Rights Foundation*, 18 March 2021, accessed May 12, 2026. 5rightsfoundation.com/resource/our-rights-in-a-digital-world-snapshot/, p.10.

³ *Ibid.*, p. 1.

⁴ *Ibid.*, p. 26.

⁵ *Ibid.*, p. 16.

⁶ *Ibid.*, p. 21.

⁷ *Ibid.*, p. 40.

obligations. Given its status as a leading international legal framework for children's rights, and Bosnia and Herzegovina's (BiH) obligations as a State party, subject to regular monitoring and required to comply with these provisions, the CRC provides the normative foundation for this report's assessment across the child protection, education, and health dimensions. The report that follows is grounded in the Convention's core provisions: the right to non-discrimination and equal access (Art. 2), child participation (Art. 12), freedom of expression (Art. 13), privacy (Art. 16), protection from violence (Art. 19), and the right to education and digital literacy (Art. 28), (para.11 & 104 of General Comment 25).^{8 9} Alongside the CRC framework, this report draws on the United Nations Sustainable Development Goals (SDGs) as a complementary normative lens for its thematic findings. Two goals are of particular relevance: SDG4 (Quality Education), which informs the analysis of digital literacy as a core component of children's rights in the digital environment, and SDG10 (Reduced Inequalities), which anchors the examination of equitable and inclusive access to the digital environment.¹⁰

2.3. Key Definitions

Throughout this report, *children's rights in the digital environment* refers to the full range of rights embedded within the CRC, including the right to protection, participation, privacy, education, and non-discrimination, that must be respected, protected, and fulfilled in digital spaces, in accordance with GC No.25.¹¹ In addition to this, the definitions that must be alluded to throughout this report are:

- **Algorithms** refer to a sequence of operations that transform an input into an output. In the context of this report, reference will be made to:
 - **Algorithmic recommendation**: recommending information or products based on data about the user (including behavioural data), and
 - **Algorithmic prediction**, which relates to predicting future behaviour or scenarios.¹²
- **Artificial Intelligence (AI)** refers to a machine-based system and the branch of computer science focused on creating systems capable of performing some tasks that

⁸ United Nations. (1989). Convention on the Rights of the Child. *Treaty Series*, 1577, p.3.

⁹ UN Committee on the Rights of the Child, General Comment No. 25 (2021) on children's rights in relation to the digital environment, 2 March 2021, CRC/C/GC/25.

¹⁰ United Nations Department of Economic and Social Affairs. The 17 goals. United Nations Sustainable Development. <https://sdgs.un.org/goals>

¹¹ UN Committee on the Rights of the Child, General Comment No. 25 (2021) on children's rights in relation to the digital environment, 2 March 2021, CRC/C/GC/25.

¹² OECD (2023), Algorithmic Competition, OECD Competition Policy Roundtable Background Note, www.oecd.org/daf/competition/algorithmic-competition-2023.pdf

typically require human intelligence, such as understanding language, recognising patterns, and making decisions.¹³

- **Cyberbullying** refers to bullying with the use of digital technologies, such as sending hurtful, abusive or threatening messages, images, or videos via messaging platforms.¹⁴
- **Digital Literacy** refers to the knowledge, skills, and attitudes that allow children to be both safe and empowered in an increasingly digital world. This includes their “play, participation, socialising, searching and learning through digital technologies”, and is underpinned by foundational ICT skills: the use of computers to retrieve, assess, store, produce, present, and exchange information, and to communicate and participate in collaborative networks via the Internet. What constitutes digital literacy will vary according to children’s age, local culture and context.”¹⁵ While this report focuses primarily on children, digital literacy is equally relevant to adults, including caregivers and educators, whose own digital competencies shape the environments in which children navigate the digital world.¹⁶
- **Online safety** refers to the practices, tools, and precautions organisations take to protect personal information, devices, and well-being while using the internet.¹⁷
- **Digital participation** refers to the “active involvement of citizens in the digital society through the use of modern information and communication”.¹⁸
- **Content risks** refer to potential harm arising from the nature of online content, including age-inappropriate material (e.g. pornography), unreliable (e.g. misinformation or disinformation) or harmful (e.g. promoting risky behavior self-harm).¹⁹
- **Contact risks** refer to potential harm created by the opportunity of users to interact online, including people hiding their identity to contact children.²⁰

¹³ UNESCO, “What is Ai? Meaning, Definition”, UNESCO <https://www.unesco.org/en/query-list/a/ai>

¹⁴ UNICEF. Cyberbullying: What is it and how to stop it. UNICEF. <https://www.unicef.org/stories/how-to-stop-cyberbullying>

¹⁵ UNICEF Office of Research – Innocenti, Digital Literacy for Children, <https://www.unicef.org/innocenti/documents/digital-literacy-children-10-things-you-need-know>

¹⁶ UNESCO Institute for Statistics. (2021). *Metadata 4.4.2* [Glossary entry: Digital literacy]. <https://databrowser.uis.unesco.org/resources/glossary/3225>

¹⁷ HUMAN Security, “What Is Internet Safety?” accessed February 23, 2026. <https://www.humansecurity.com/learn/topics/what-is-internet-safety/>

¹⁸ European Centre for the Development of Vocational Training (Cedefop), “Digitale Beteiligung, digitale Mitwirkung, digitale Partizipation,” VET Glossary, accessed February 23, 2026. <https://www.cedefop.europa.eu/en/tools/vet-glossary/glossary/digitale-beteiligung-digitale-mitwirkung-digitale-partizipation>

¹⁹ Committee on the Rights of the Child, General Comment No. 25 (2021): Glossary, INT/CRC/INF/9314/E (12 February 2021), p.1.

²⁰ Ibid.

- **Conduct risks** refer to potential harm arising from the behaviour of a user, including cyberbullying, “sexting”, hate speech, and the disclosure of private information of other users.²¹
- **Contract risks** refer to potential harm arising from exposure to inappropriate commercial relationships or pressures, including compulsive use, gambling, targeted advertising, hidden costs, unfair terms and conditions, and loss of control over personal data.²²
- **Content moderation** refers to the practice of monitoring and reviewing user-generated content against pre-established rules to remove impermissible material.²³
- **Disinformation** refers to false information that is knowingly shared.²⁴
- **Manosphere** refers to the ecosystem of online communities and groups that spread harmful views about gender, masculinity, and women.²⁵
- **Misinformation** refers to false information that is shared without deliberate intent to deceive.²⁶

2.4. Bosnia and Herzegovina’s Context

Access to digital technologies by children in BiH is marked by both high usage and persistent structural gaps. While more than 80% of children use the internet daily²⁷, with 87% of them spending over three hours on social media and streaming platforms²⁸, more than 30% of schools still lack internet connectivity²⁹. This widespread personal use of online platforms and limited school infrastructure highlights persistent inequalities in how children can access digital tools. Significant gaps persist in the integration of digital technologies into formal education in BiH, undermining children’s digital literacy. Indeed, digital exclusion remains widespread with an estimated 14,000 students still lacking internet access, and a student-to-computer ratio of 1 computer for every 20 students, far below the OECD average of almost 1 computer per student.³⁰ Due to the COVID-19 pandemic, these educational inequalities became more

²¹ Ibid., p.2.

²² Ibid., p.2.

²³ Ibid., p.2.

²⁴ Ibid., p.2.

²⁵ *What is the manosphere and what are the impacts?*. Plan International UK. (n.d.-b). <https://plan-uk.org/our-work/girls-rights/what-is-manosphere-what-are-impacts>

²⁶ Committee on the Rights of the Child, General Comment No. 25 (2021), p.2.

²⁷ UNICEF Bosnia and Herzegovina (2025). *Situation Analysis of Children and Youth in Bosnia and Herzegovina*, p. 82.

²⁸ Ibid., p. 60.

²⁹ Ibid., p. 56.

³⁰ Ibid., p. 55.

explicit, especially among children in rural areas, Roma children, children with disabilities, and girls.^{31 32}

The current political landscape offers limited but notable entry points for children to engage in decisions affecting their digital experiences. BiH has established Children's Parliaments at the entity and state levels, providing institutional spaces where children and young people can express their concerns about issues that affect them. In the digital context, these have increasingly served as platforms through which young people articulate and share their experiences of online risks, digital exclusion, and the lack of age-appropriate safety mechanisms. However, the extent to which their outputs are meaningfully integrated into digital policy processes remains unclear.

Children in BiH remain inadequately protected in the digital environment. Responses to online risks remain fragmented, and mechanisms for reporting and prevention are underused. In February 2025, BiH adopted a new law on the Protection of Personal Data³³, aligning with the EU's General Data Protection Regulation (GDPR), the regional benchmark for data privacy. Nevertheless, child-specific protection and digital literacy initiatives remain insufficient. Closing these gaps will require not only better access to digital tools but also stronger digital literacy, greater parental-teacher awareness, and policies adapted to emerging challenges, all of which are essential to ensuring a safer digital environment for children.

This research focuses on Bosnia and Herzegovina, a country marked by a decentralised governmental structure rooted in the post-Dayton settlement.³⁴ The country is composed of the State level, two entities: the Federation of Bosnia and Herzegovina and Republika Srpska; as well as the self-governing Brčko District, with the Federation of BiH further divided into ten cantons that exercise additional competencies in key social sectors. Therefore, BiH lacks a unified, country-wide framework for digital rights of children, producing uneven practices across entities and cantons, which also deepens the disparities in how children access and

³¹ Ibid., p. 56.

³² USAIDS, Digital Ecosystem Country Assessment (DECA): Bosnia and Herzegovina, MEASURE II, (2023) <https://measurebih.com/uimages/USAID-BiH-DECA-final.pdf>

³³ Official Gazette of BiH, No. 12/25

³⁴ The 1995 Dayton agreement ended the Bosnian war. It established a single and sovereign Bosnia and Herzegovina. Annex 4 established the current Constitution of BiH.

experience the digital environment.³⁵ This structural gap can leave children without adequate support or online safety mechanisms to explore the digital sphere safely.³⁶

2.5. Objectives, Contribution and Roadmap

This research has been commissioned to explore the evolving relationship between children's digital experiences in BiH and the systems designed to protect them. As new generations grow up immersed in digital environments, questions arise regarding whether existing policy frameworks adequately address the emerging challenges of the online sphere for children.

It examines digital governance frameworks for children in BiH, focusing on enhancing online safety measures and encouraging meaningful and safe digital engagement among children. The research first seeks to understand the existing institutional landscape by asking: *what is the status of digital rights of children in BiH? (RQ1)*.

The study investigates the current state of policies addressing digital literacy, and online protection of minors, identifying areas where frameworks could be further developed. Moreover, by mapping relevant policy and institutional actors, the study seeks to clarify responsibilities and strengthen coordination around the digital rights of children, *examining to what extent existing policies and strategies have been effective in protecting those rights and preventing violations, and how stakeholders have coordinated around them (RQ2)*. This research will create a comprehensive evidence base for policy development and institutional models through the conduct of comparative research with Croatia and Montenegro, neighbouring Balkan countries selected due to their shared linguistic and cultural frameworks. This comparison will focus on *identifying what lessons BiH can draw from Croatia and Montenegro regarding policy implementation on the digital rights of children (RQ3)*, providing practical guidelines for developing effective frameworks for protecting the digital rights of children in BiH.

In addition, we will identify innovative, evidence-based methods to translate research findings into accessible and engaging formats for children, parents, teachers, and policy-makers, *guided by the question of how UNICEF can support stakeholders in preventing online risks while safeguarding the digital rights of children (RQ4)*.

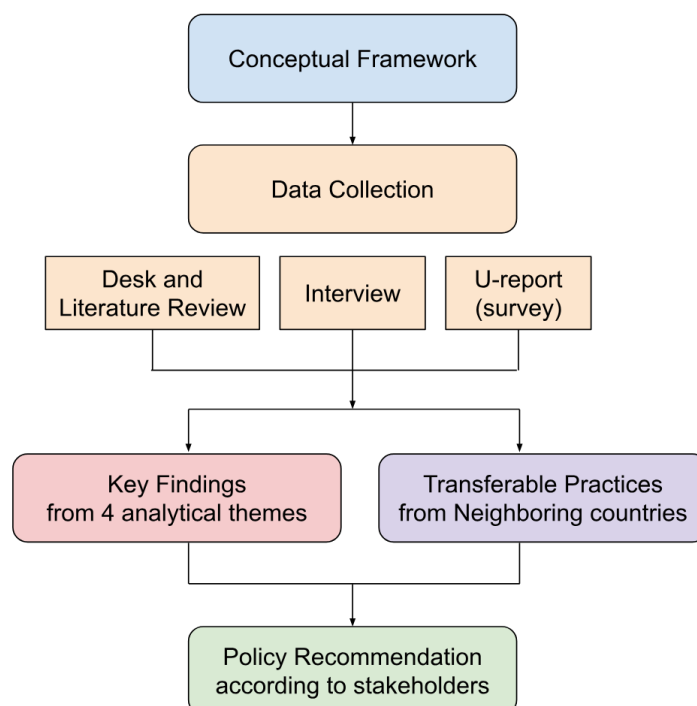
³⁵ Office of the United Nations High Commissioner for Human Rights (OHCHR) Committee on the Elimination of Racial Discrimination (2024), <https://www.ohchr.org/en/treaty-bodies/cerd>

³⁶ Unicef Bosnia and Herzegovina (2025). Situation Analysis of Children and Youth in Bosnia and Herzegovina.

These objectives and research questions respond to a clear tension: children's lives are becoming increasingly digital and new technologies are emerging, yet protection mechanisms are not able to keep pace. Meanwhile, decentralised governance structures and fragmented institutional coordination implement multifaceted safeguarding policy frameworks. This gap raises urgent questions about accountability: if responsibilities are dispersed across entities, cantons, and different sectors, it becomes difficult to determine who bears the obligation to act when the rights of children in the digital environment are violated or when risks go unaddressed. At the same time, the absence of comprehensive national strategies leaves children, particularly those in vulnerable groups, without enduring protection.

To address these changes, the report is structured as follows. The methodology section outlines the research design, data collection methods, and the comparative framework applied across the three country contexts. The findings section presents the empirical evidence gathered, organised around four thematic areas: the online risks that children face in BiH; digital literacy and the support systems available to them; the governance frameworks currently in place; and the inclusion and equity of vulnerable groups. Drawing on the comparative analysis, the subsequent section identifies the good practices from Croatia and Montenegro that may offer transferable lessons applicable to BiH. The report concludes with a synthesis of the key insights before setting out concrete recommendations addressed to the key stakeholders responsible for the prevention and protection of children's rights in the digital environment.

Figure 2. Roadmap: Report & Methodology



3. Methodology

This research aims to provide valuable insights that can be applied in the protection and advancement of the digital rights of children in BiH by examining the gap between established global and regional legal frameworks and their implementation. Identifying the gaps from desk review and drawing on key findings from interviews and U-Report targeting children in BiH, the study concludes with a set of evidence-based policy recommendations.

3.1. Conceptual Framework

The conceptual foundation of this research lies in the global legal framework established by the CRC and its GC No. 25, which places primary responsibility on State parties as the principal right-bearers in upholding children's rights in digital environments.

GC No. 25 officially recognises that protection of children's rights should also extend to online and that the state has an obligation to lead the implementation of legislation, through the lens of fundamental human rights. In particular, GC No. 25 requires States Parties to proactively adopt a comprehensive set of legislative and administrative measures to realise children's

rights, including awareness-raising, training for relevant professionals, cooperation with civil society, and protection in the digital environment.

The CRC and GC 25 are marked as the primary evaluative standard by which BiH's legal and institutional landscape is assessed. Under this principle of child protection and prioritisation of their basic rights, this study follows the structure of applying civil rights and freedoms to the digital sphere.

BiH is not only bound by the CRC and the GC No. 25, but also to regional frameworks, ensuring the country operates within a clear legislative and policy framework that clarifies its obligations to promote and safeguard children's rights in the digital sphere. These obligations are shaped by a range of legally binding treaties, including the Budapest Convention on Cybercrime, the Lanzarote Convention on the Protection of Children against Sexual Exploitation and Sexual Abuse, the General Data Protection Regulation (GDPR), and the Digital Services Act (DSA). In addition to these legal instruments, BiH's commitment is reflected in its engagement with the Better Internet for Kids+ (BIK+) Strategy, which provides a concrete policy roadmap for creating safer and empowering online environments for children. Having been granted EU candidate country status by the European Council in December 2022 and its membership in the Council of Europe (CoE), BiH has directly signed and ratified these international treaties and regional acts to progressively align its domestic legislation with EU regulations.

As the conceptual framework of this research, all the conventions and legal acts are interconnected to frame the concept of digital rights of children and implement the relevant policy. According to this framework, the study evaluates the extent to which BiH's domestic legislative and institutional landscape adequately protects and promotes the digital rights of children, and identifies the gaps that policy recommendations must address.

3.2. Research Design

This research combines a desk and literature review, semi-structured interviews with experts, and a digital survey with children from BiH to produce a comprehensive and multi-perspective analysis. The CRC and GC No. 25 serve as the report's normative framework, alongside relevant European digital governance frameworks linked to BiH's EU candidate status

The desk review establishes the legal, institutional and policy baseline, maps the governance landscape and relevant stakeholders, and includes a comparative analysis of selected policies and practices from Montenegro and Croatia.

Semi-structured interviews with experts from the international to the local level provide qualitative evidence to contextualise this baseline and identify operational gaps and implementation challenges. U-Report, a digital survey conducted on UNICEF’s platform, complements these findings by incorporating the perspectives of children and young people themselves.

Findings across all three sources were triangulated to compare normative frameworks, institutional perspectives and children’s experiences, ensuring that conclusions remain grounded in both policy analysis and lived realities, in line with the principle of the best interests of the child.

The desk review and legal analysis primarily address RQ1 (status of digital rights of children in BiH) and RQ2 (policies and stakeholder coordination), by identifying regulatory and implementation gaps according to international standards. The interviews deepen RQ2 by exploring how institutional actors experience coordination and implementation for RQ4 (policy recommendation). The U-Report contributes to RQ1 and RQ2 by providing data on children's own experiences, perceptions, and knowledge gaps. The comparative analysis with Montenegro and Croatia addresses RQ3 (good practices and lessons from the region), triangulating with desk review sources and interview insights to identify promising governance practices that BiH can adopt.

Table 1: Research methods with research questions

Method	Purpose	Research Questions
Desk Review & Legal Analysis	Policy baseline, Gap identification	What is the status of digital rights of children in BiH? To what extent have existing policies and strategies been effective in protecting those rights and preventing violations, and how have stakeholders coordinated around them?

Interviews	Test policy review, Operational state Qualitative data	What lessons can BiH draw from Croatia and Montenegro regarding policy implementation on the digital rights of children? How can UNICEF support stakeholders in preventing online risks while safeguarding the digital rights of children?
U-report	Reflect the perspective of children, Collect quantitative data	What is the status of digital rights of children in BiH? To what extent have existing policies and strategies been effective in protecting those rights and preventing violations, and how have stakeholders coordinated around them?
Comparative Analysis	Best practices Lessons from policy implementation	What lessons can BiH draw from Croatia and Montenegro regarding policy implementation on the digital rights of children
Triangulation	Integrate findings	All RQs

Analytical Themes

Based on the legal framework, the research focuses on four analytical themes encompassing all the sectors and measures related to digital rights of children: (1) *Online Risks and Emerging Trends*, (2) *Digital Literacy and Support Systems*, (3) *Governance and Institutional Frameworks*, and (4) *Inclusion and Equity*.

These thematic sections were drawn from the desk review findings and used to organise interview questions. These sections subsequently guided the codification and analysis of interview data and served as the structural framework of this report.

Sampling Strategy

Primary data collection for the analysis was conducted through two methods: semi-structured interviews and a digital survey via the U-Report BiH platform provided by UNICEF. These methods provided both qualitative and quantitative evidence from relevant stakeholders and young people themselves.

Semi-structured Interviews

Interviewees were selected through a stakeholder mapping informed by data and insights obtained during the desk review, prioritising experts and organisations with direct experience in children’s digital rights in BiH and the Balkan region. Priority was given to those whose work featured in the reports reviewed during the desk review, given their field-level knowledge and established credibility within the sector. UNICEF BiH also contributed suggestions to expand the pool of interviewees. This process ensured the sample captured both on-the-ground experience and broader policy perspectives across child protection, digital safety, children's participation, and academic research.

As a result, a total of 13 interviews were conducted with representatives from the following organisations:

Table 2. Interviewee Affiliation Categories

Affiliation	Number of interviewees
NGO/Civil Society	6
Academia/Research	2
IO	2
Governmental Institution	3

In this research, semi-structured interviews were planned, with core questions provided in advance, while also allowing respondents to expand on various aspects of their experiences, insights, concerns, and recommendations. To capture the operational realities, semi-structured interviews provide contextualisation and complexity of the landscape of safeguarding the digital rights of children.

U-Report

U-Report is a digital open participation platform operated by UNICEF, designed to enable young people to share their views and experiences on issues that affect them.³⁷ Direct interviews with children were not conducted, as meaningful and safe engagement with minors would have required additional safeguarding measures, trained local interpreters, and ethical consideration. Rather, children's perspectives were captured through U-Report, a UNICEF-operated platform that functions under UNICEF's privacy policy and data protection standards, ensuring anonymous and voluntary participation.

In BiH, U-Report reaches registered users via Viber. For this research, the sample included enrolled users who have access to the UNICEF BiH U-Report platform. While the questions were initially intended for children, the open nature of the platform included young adults as respondents, which led them to offer valuable perspectives. Consequently, responses ranging from children to adults contributed to identify findings, given they navigate the same digital environment and are increasingly assuming roles as parents, caregivers, and adults responsible for the next generation of children.

Additionally, U-Report data cannot be considered nationally representative, as responses come from a digitally connected, self-selecting sample. Therefore, findings drawn from this source are treated as indicative and complementary to the expert interviews conducted as part of this research.

The survey composed ten questions in total: seven closed-ended questions and one open-ended question. Questions were formulated in child-friendly and local language, which were translated into English after responses were recorded. The design of the U-Report was in accordance with UNICEF's ethical guidelines and U-Report's platform standards. Topics

³⁷ U-Report, UNICEF, <https://www.u-report.org/>

included parental screen-time controls, responses to exposure to uncomfortable online content, and awareness of algorithmic content curation.

3.3. Data Analysis

Desk and Literature Review

The research identified gaps in the different analytical themes presented above and a comparison with Montenegro and Croatia through a comprehensive desk and literature review. Key sources were monitoring reports and domestic documents and data from NGO/Civil society and International Organizations (IO), and governmental agencies, such as domestic strategies, policy documents, and statistical data: Better Internet for Kids (BIK+) strategy, the Situation Analysis of Children and Youth in Bosnia and Herzegovina, Digital Development Country Profile, and Child Rights Status Monitoring Report in BiH.

On the side of these key documents, this research was also complemented by the report of the legal analysis, drafted and shared internally. This analysis was conducted separately by UNICEF BiH's national legal consultant to reflect the legal context of BiH for children and to evaluate the environment of domestic laws. It structures multi-layered mapping with integration of desk review, comparative legal analysis, scenario-based assessment, and targeted stakeholder validation.

The legal analysis covered a wide range of legal instruments across the domestic domains, from family law to labour and taxation law, and provisions relevant to child protection against harmful digital content. Among the findings from the legal review, this study integrated the significant gaps from the analysis, directly connected to children's participation, protection, privacy, consent, economic exploitation, and institutional accountability in digital environments in governance level.

For comparative analysis, the research considered the potential areas for alignment, reform, and strengthened protection of children's rights in the digital sphere by reviewing documents of international organisations and the initiatives of the Western Balkan Safer Internet Centre for insights from the regional landscape, especially that of Montenegro and Croatia.

Thematic Coding of Interviews

The interview transcripts were analysed through a thematic coding process structured based on the four analytical pillars of the conceptual framework. Four themes — *Online Risks and Emerging Trends*, *Inclusion and Equity*, *Digital Literacy and Support Systems*, and *Governance and Institutional Frameworks* — were used as categories to maintain the coherence of the conceptual framework and to deepen the gap analysis initiated in the desk and literature review.

The coding of all the transcribed interviews was processed and analysed, capturing the most relevant data for our research in the form of thematic tables, which were filtered and interpreted by two other members to reduce personal and interpretation bias. In the process, relevant passages were coded and captured by both direct quotations and respondents' own assessments of institutional practices, challenges, and gaps. When coding differences emerged, disagreements were resolved by cross-referencing recurring themes across interviews and prioritising those that appeared consistently across multiple interviews. If the responses pointed out unexpected issues with analytical significance, they were flagged outside of categories but as a sub-theme or gap for further research. Also, responses to core questions asked consistently across interviews were used as comparable data points for descriptive analysis of how different stakeholder types characterise the same issues.

Descriptive Statistical Analysis

The analysis of the U-Report proceeded in two ways corresponding to two types of questions. Responses to the closed-ended questions were analysed descriptively, examining the frequency and distribution of answers to assess respondents' awareness of child protection mechanisms and their exposure to digital risks. The open-ended questions were analysed thematically, with responses reviewed to identify recurring concerns.

Triangulation

Findings from the desk review, legal analysis, interviews, and U-Report survey were triangulated throughout the analytical process. When evidence from multiple sources agreed on the same finding, this convergence was noted as strengthening the findings. On the other hand, the divergence was treated as analytically significant on its own, and is explicitly discussed.

Table 3: Triangulation and filtration of data

Triangulation	Comparison	Integration
Convergence	Agreement across desk review, interviews, and U-Report	Integrate the convergence from the primary and secondary data with the findings and explicitly flag in the analysis
Divergence	Disagreement between interviewees	When data collected by interviewees or U-report data was flagged as potentially unsubstantiated, research ensured to cross-reference it with the desk review; if the data was still not convergent, we conducted further research. If this research did not support the initial claim, then we chose not to include it in the research
	Inconsistency between the desk review and the interviewees	After fact-checking, interviewees' claims were contradicted by legal texts or policy documents, and the discrepancy of practice and initiative is explicitly noted in the analysis.
Gap	Newly raised issue from one of the phases of data collection, but absent from the others	Retained in the analysis as a substantive finding ● Issues raised by interviewees or U-Report are flagged as potentially undocumented realities ● Issues present in the desk review but not raised by any interviewee are noted as possible gaps.

3.4. Ethical Considerations

Consideration of positionality

As a research team of students from the Geneva Graduate Institute, the team acknowledges the positionality of being researchers outside BiH with different cultural backgrounds, which brings potential bias as external researchers without fully understanding the local context. However, the legal analysis, which was introduced independently by national legal consultants, has deepened the findings from this research and reduced the risk of potential bias. Also, close

collaboration with the UNICEF BiH team helped bridge the contextual proximity gap that comes from remote research done by external conductors.

Ethical procedure of data collection

This research was conducted under proper ethical procedures of consent and private data protection. For the interview, the team ensured that verbal and written consent was confirmed before the interview, with the delivery of the purpose, procedures, and expectations of the interview for the research. Also, interviewees were explicitly informed of their right to withdraw at any time without consequence. For the U-Report survey, consent from children and the use of data were obtained in line with UNICEF's U-Report ethical guidelines and privacy policy. All the primary data that the team collected throughout the research, including consent records, recordings, and transcripts, was stored securely in a data cloud server, which does not allow access. As the survey intended to capture the voice of children and youth, its questions were carefully phrased to be child-friendly, comprehensible, and free from triggering language. The entire process of conducting the survey was developed in close coordination with the UNICEF BiH team to ensure full compliance with child protection standards. A documented referral pathway was also in place, in accordance with UNICEF's protocols, if a child disclosed information relating to harm during the survey.

3.5. Limitations

Limitation in the data sample

When looking at the limitations of our methodological approach, it is crucial to mention how the qualitative sample used in our interviews is of immense value, while it does not represent all actor groups. There may be a disproportionate amount of interviewees from certain NGOs, ministries, the UN or the private sector, which can be attributed to the snowball sampling methodology in which the representatives may be skewed towards certain NGOs/ UN actors. We ensured that in the process of conducting interviews, we included interviewees from all the above-mentioned sectors to have representation and insight that is heterogeneous.

Language

Language barriers posed an additional constraint, limiting access to government documents, NGO materials, and policy texts produced in Bosnian, Croatian, or Serbian, and potentially resulting in gaps in the documentary evidence base.

Comparative analysis

The cross-country review of Montenegro and Croatia is illustrative rather than exhaustive. It is intended to identify good practices that BiH could consider adopting, while remaining attentive to transferability constraints. Croatia's EU membership, in particular, grants it access to structural and investment funds that are unavailable to BiH, making direct policy transfer difficult without significant contextual adaptation.

Limitation of scope

It is important to note that the scope of this research is confined exclusively to systemic and policy-level analysis. No individual case studies of harmed children were included, and all analyses proceeded strictly within the applicable legal framework to protect the dignity and safety of vulnerable individuals.

Policy recommendation

The highly decentralised governance architecture presents significant challenges to the feasibility and sustainability of national-level policy recommendations. As this research has acknowledged, prioritising children's rights is already constrained by the limited allocation of resources and political fragmentation in the implementation of existing protection and prevention mechanisms. Therefore, this report presents policy recommendations structured according to relevant stakeholders and governance levels, with particular attention to applicability and contextual fit. Specifically in relation to the recommendation that refers to establishing a nationally coordinated digital literacy framework across all education levels, entities, and cantons, the transferability can be complex, given its fragmented and decentralised governmental structure. A coordinated response from the competent educational authorities is pivotal when striving to safeguard children's digital rights.

4. Thematic findings

4.1. Online Risks and Emerging Trends

Finding 1. Risks are becoming less visible and harder to detect

The nature of risks experienced by children and young people in the digital environment is evolving. Interviews with stakeholders suggest that violence and harm are becoming less visible and more difficult for adults to recognise. As an NGO representative noted, “children do not have fights in schoolyards anymore, violence has become much more quiet.”

This shift is closely linked to the spaces in which these risks occur. The same NGO representative explained that “bullying and online violence [...] are a new form of violence, which we adults don’t see because it happens in closed Viber groups, WhatsApp groups, Facebook, and Instagram groups.” Unlike traditional forms of violence, these **interactions increasingly take place in private digital environments, making them largely invisible** to parents, teachers and other adults, and therefore harder to detect and address.

This is consistent with findings from the desk review, which show that online harm often takes place on messaging apps and social media, where interactions are private, harder to monitor, and more difficult for adults to intervene in.³⁸

Beyond the invisibility that private digital spaces create, children’s online risks are further shaped by **algorithmic recommendation systems and AI-generated content that actively determine what they are exposed to on digital platforms**. Interviews suggest that the issue is not only what children and youth choose to watch, but also how digital platforms continuously push content towards them. As one academic researcher explained, children and young people are “nudged all the time” when they open their screens. In addition to algorithmic recommendation, AI adds another layer to these risks, particularly through deepfakes and image-based abuse.³⁹

³⁸ UNICEF, *Cyberbullying: What is it and how to stop it*. Accessed May12, 2026. <https://www.unicef.org/stories/how-to-stop-cyberbullying?>

³⁹ Mušić, E. (2025). *Children in the digital environment – Implications of the creation and publication of user-generated content for children’s rights: Legal analysis* [English translation of original document]. UNICEF Bosnia and Herzegovina (p. 22), p. 55-56.

Survey data provides further insight into how children and young adults experience these systems. When asked how they feel about the way content is suggested to them, 44% report a neutral perception, while 23% feel uncomfortable (Figure 3). This is reinforced by another question, where 51% of them stated that their experience “depends on what they see”, unveiling the highly variable nature of algorithmic content exposure (Figure 4).

These findings suggest that children and young people’s online experiences are not fixed but largely shaped by the content they are exposed to. This reinforces the role of algorithmic systems in determining not only what they see, but also how they feel and engage with digital platforms.

Taken together, these two processes, the migration of harm into private spaces and the opacity of algorithmic systems, showcase a broader transformation in how risk is manifested in the digital lives of children and young people. Today, risks have relocated into the digital sphere, making harm harder to be seen, anticipated, and addressed through existing prevention and protection approaches.

Figure 3. Young people’s answers when asked how they feel about the way content is suggested on their feed. (n = 201).

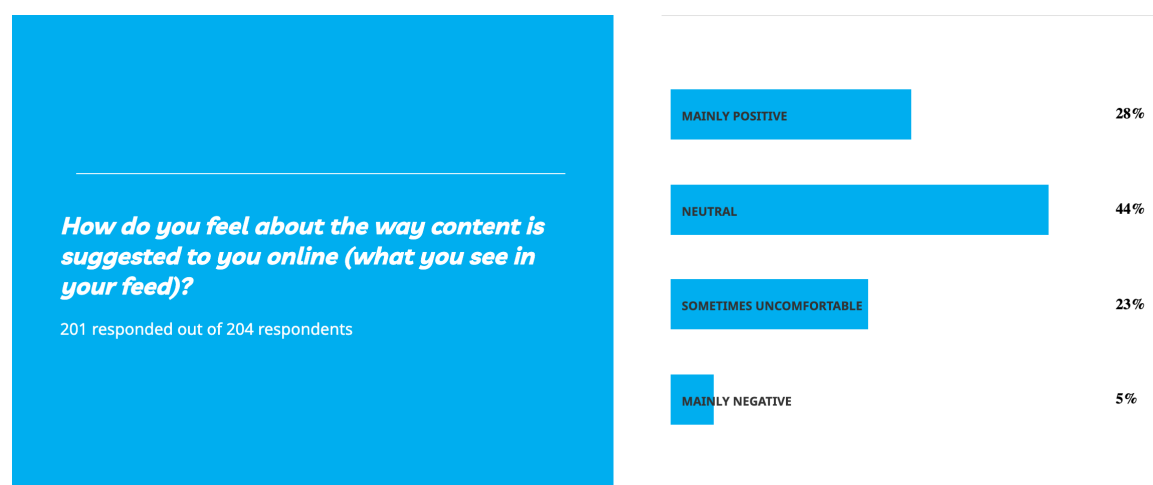
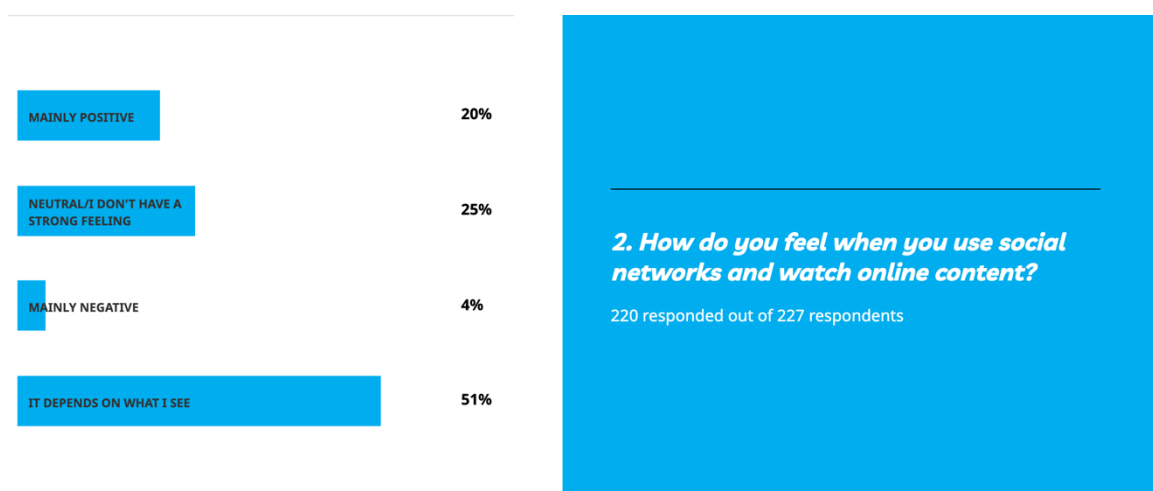


Figure 4. Young people’s answers when asked how they feel when they use social networks and watch online content. (n = 220)



Finding 2. Digital environments are increasingly affecting children and youth’s mental health and well-being

Interviews highlight growing concerns about the impact of digital environments on children's and youth's mental health. This has direct consequences for their behaviour and well-being. Interviewees linked excessive screen time and short-form content to frustration, anxiety, reduced attention span and difficulty disconnecting from smartphones. An academic researcher mentioned “the habit of consuming a lot of very short content and the resulting impact on the capacity to focus”. This concern was echoed by children and young people themselves: when asked what they would change about how apps treat them, respondents pointed to addictive algorithms, scrolling dependencies, and the pull of “brainrot”⁴⁰ content, signalling that they are not only affected by these dynamics but actively naming them and requesting for a change.⁴¹

These patterns are reflected in children and young people’s own experiences. While some report positive interactions online, a significant share describe feeling uncomfortable or dependent on what they see, suggesting that digital use is closely linked to emotional responses (Figure 3). Intensive and long-term use of digital platforms, especially in earlier age groups, is

⁴⁰ The supposed deterioration of a person’s mental or intellectual state, especially viewed as the result of overconsumption of material (now particularly online content) considered to be trivial or unchallenging. ‘Brain rot’ named Oxford Word of the Year 2024. Oxford University Press. (2024, December 2). <https://corp.oup.com/news/brain-rot-named-oxford-word-of-the-year-2024/>

⁴¹ U-Report survey, responses to open questions.

associated with an increase in anxiety, concentration problems, sleep disturbances and a reduced subjective sense of well-being among children and adolescents.⁴²

Taken together, these findings show that digital risks are not only about exposure to harmful content, but also about their broader impact on children and youth's well-being, behaviour and ability to regulate their use of digital technologies.

4.2. Digital Literacy and Support Systems

Digital literacy, as a core component of SDG 4 (Quality Education), and access to effective support and protection systems are central to children's rights in the digital environment. The GC No. 25 requires States to integrate digital literacy throughout all school years, including the training of educators, as well as raising awareness and knowledge among adults.⁴³ These standards also require States to ensure accessible reporting mechanisms and adequate support.⁴⁴ This section examines how these principles are implemented in Bosnia and Herzegovina and identifies key gaps.

Finding 3. Uneven and insufficient digital literacy education limits children's ability to navigate online risks and benefit from their opportunities

Desk research indicates that digital literacy is not systematically integrated into formal education in Bosnia and Herzegovina. There is no mandatory, standardised curriculum on digital safety, and implementation is fragmented across entities and cantons.⁴⁵ Survey responses confirm this inconsistency: young people report learning how to stay safe online through unstructured sources, with no dominant or formal channel. Notably, 51 % of respondents between the ages of 15 and 19 report learning independently, suggesting a lack of institutional guidance (Figure 5).

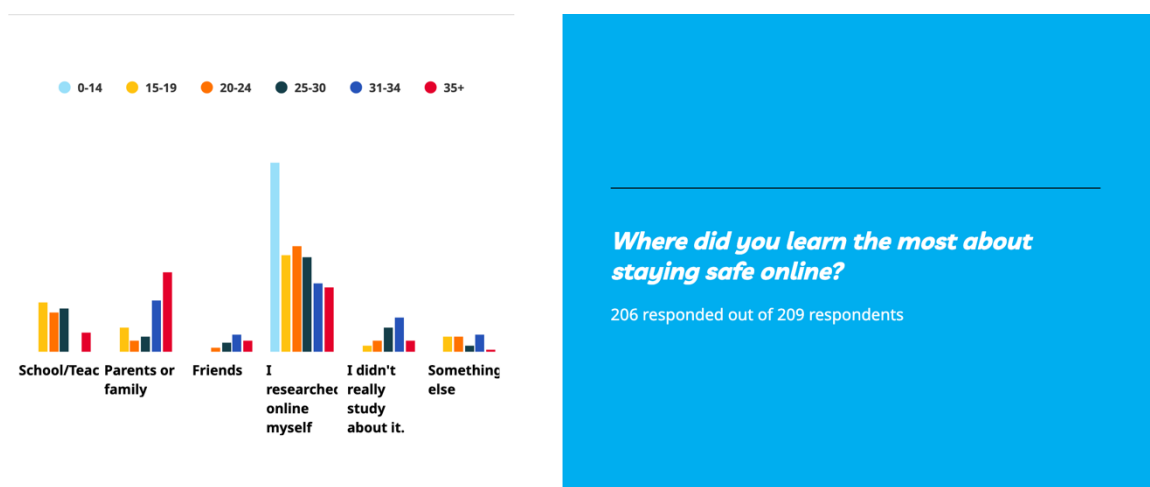
⁴² UNICEF Bosnia and Herzegovina (2025), *Situation Analysis of Children and Youth in Bosnia and Herzegovina*. UNICEF BiH, p.10.

⁴³ For further details, see §32, §84-85, and §104-105, of the General Comment No. 25.

⁴⁴ For further details, see §26, and §44-45, of the General Comment No. 25.

⁴⁵ UNICEF Bosnia and Herzegovina. (2025). *Situation analysis of children and youth in Bosnia and Herzegovina* (p. 10). UNICEF BiH., p. 57-60.

Figure 5. Young people’s answers when asked where they learned the most about staying safe online – categorised by age groups (n = 206)



Interviews corroborate these findings. Stakeholders highlight that those existing initiatives, such as workshops led by external actors, are occasional and unevenly distributed. As an NGO representative noted, “children from rural parts of the country don’t have as much information about online safety as children from urban parts”, underscoring clear disparities. A government representative emphasised the absence of mandatory digital safety content in school curricula. These gaps are reflected in broader outcomes, the ICILS Results Report (2023) highlighted that 37% of 14-year-old students in Bosnia and Herzegovina do not reach minimum levels of Computer and Information Literacy (CIL).⁴⁶

Finding 4. Limited digital literacy among teachers undermines trust and support for children

Desk research indicates that digital literacy among parents, caregivers and teachers remains limited, with no systematic competency framework for educators and a lack of clear, accessible guidance.⁴⁷ A psychologist stressed that restrictive approaches are insufficient, and that online safety requires “conversations and trust rather than just monitoring”. Survey data reveal the consequences of these gaps. Children’s daily lives are largely structured around home and school, limiting the number of adults they can turn to when something goes wrong online. Yet

⁴⁶ International Association for the Evaluation of Educational Achievement (IEA), *Preparing students for life in a digital world: ICILS 2023 international report*, 2023. https://www.iea.nl/sites/default/files/2024-11/ICILS_2023_International_Report_0.pdf

⁴⁷ Vashchenko V., *Teachers in Bosnia and Herzegovina: Driving force behind digital transformation of education*, UNICEF BiH, January 2023. accessed May 12, 2026. <https://www.unicef.org/bih/en/stories/teachers-bosnia-herzegovina-driving-force-behind-digital-transformation-education>

only 11% report turning to a parent or teacher (Figure 6). In addition, 67% report no parental limits on screen time, suggesting limited engagement (Figure 7).

Figure 6. Young people’s answers when asked how they react when they see something on the Internet that makes them feel uncomfortable (n = 212)

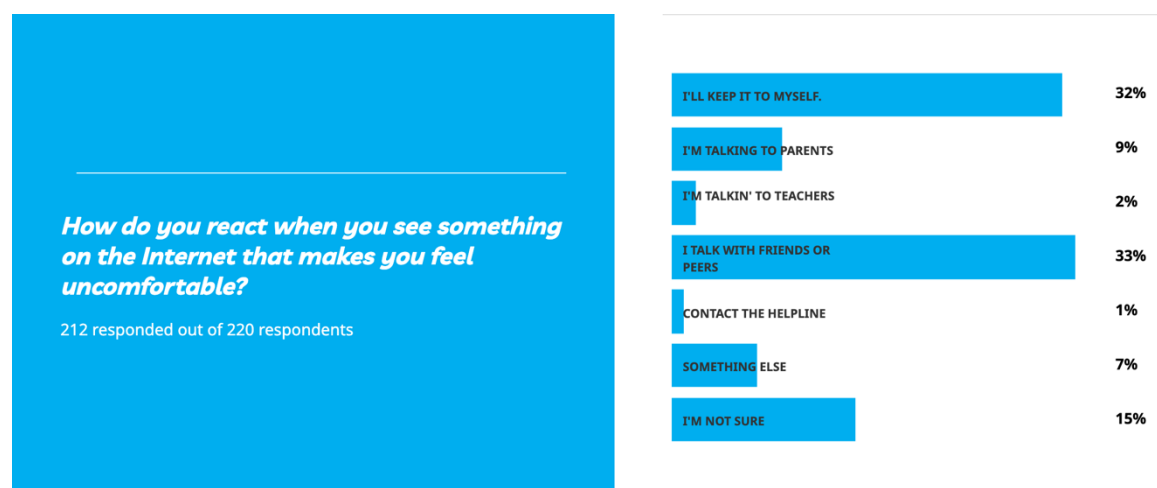
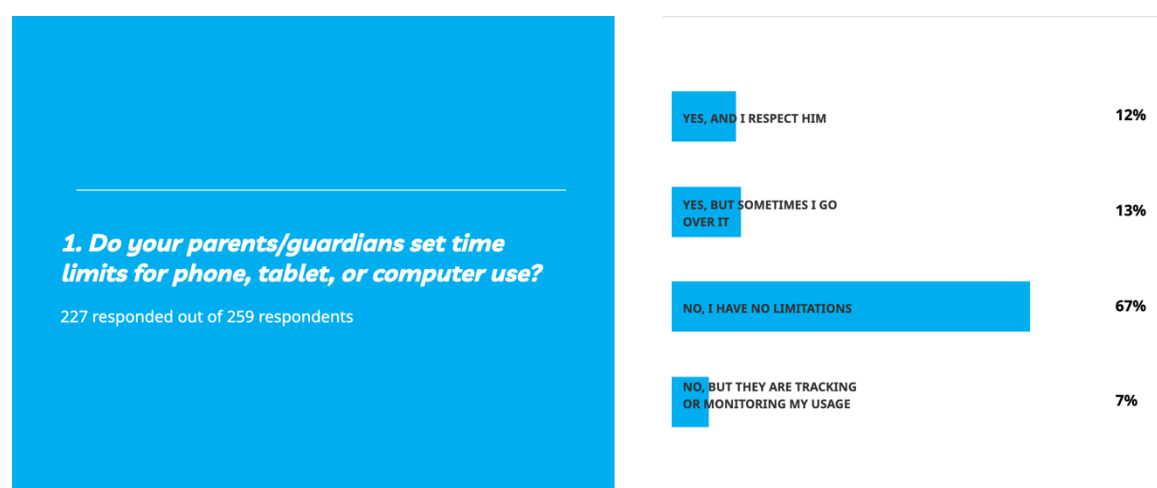


Figure 7. Young people’s answers when asked if their parents/guardians set a time limit for screen use. (n = 227)



Taken together, these patterns reveal a weakening of trust and support. As a helpline representative noted: “The most important issue in all of it: children don’t have trust [...] in their parents or in their teachers”. This lack of trust, linked to the absence of clear and accessible support pathways, leaves many children uncertain about where to seek help.

Limited adult capacity, combined with low levels of trust, weakens the ability of educators to effectively guide and support children in the digital environment. Children often rely on a

narrow and fragile network of adults centred on home and school, which is not always equipped to respond to digital risks or help them fully benefit from digital opportunities.

Finding 5. Existing support systems are fragmented, reactive and underused

While the previous finding focused on the role of parents, teachers, and adults, this finding looks at formal protection mechanisms such as helplines, reporting systems, and child protection services. These mechanisms do exist in Bosnia and Herzegovina, but their effectiveness remains limited by low visibility, weak accessibility and reactive responses. Survey data resonate with this gap, confirming the disconnection between preventive efforts of formal systems in implementation and children's actual behaviour. Only 1% of children report that they would contact a helpline when encountering harmful content online, while 33% turn to peers and 32% keep it to themselves (Figure 6).

Interviews suggest that children often do not know how to use existing reporting systems, or do not see them as realistic options when something goes wrong online. A government representative described the “*Blue Phone*” (Plavi Telefon) as a positive example, because it gives children the possibility to communicate “via chat” or “similar forms of contact”, which is more adapted to how children seek help. However, another government representative also stressed the limits of the current system, noting that Bosnia and Herzegovina lacks mechanisms able to provide this kind of support “24 hours a day, 7 days a week”. This illustrates a broader issue: formal protection pathways are not consistently available or integrated into children's everyday lives, even when children need them.

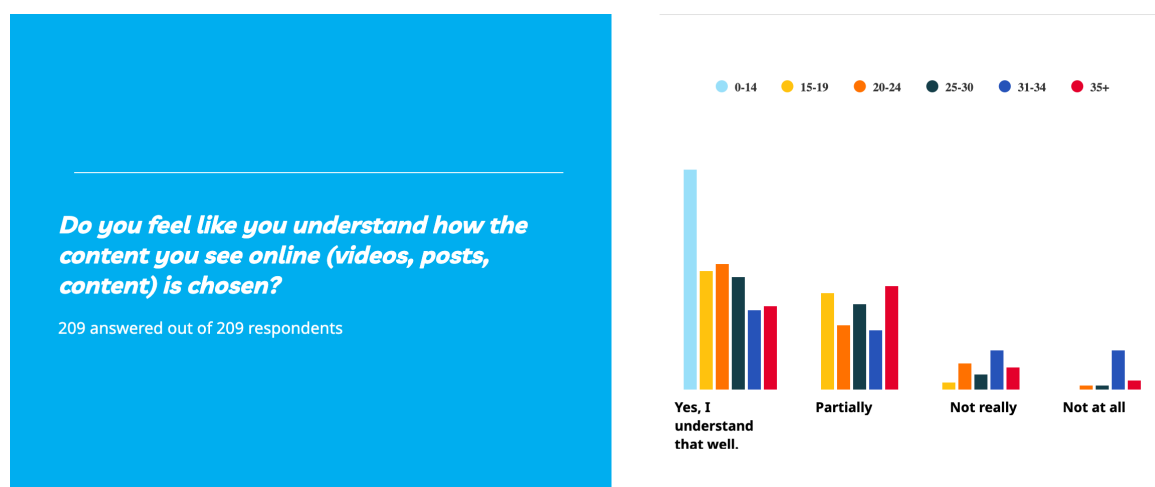
Existing responses tend to intervene only after harm has already occurred, rather than helping children avoid or report risks earlier. As a government representative explained, there is a need to “improve the visibility and accessibility of protection mechanisms, speed up institutional responses, and focus more on prevention.” This is further evidenced by the growing number of children discovering the helpline through ChatGPT, which implies that awareness of child protection services remains insufficient.

Finding 6. Limited awareness and engagement among parents and caregivers weaken preventive approaches

Preventive efforts aimed at supporting parents in the digital environment remain limited in reach, continuity and effectiveness. While various awareness-raising initiatives exist, they are largely campaign-based, time-limited and non-mandatory, which restricts their ability to generate sustained engagement.

Interviews indicate that parental awareness of online risks remains low, often shaped by broader socio-economic constraints. As an NGO representative noted, many parents “strongly believe that if their child is at home and in their room, they are safe”, while simultaneously feeling less digitally competent than their children: “people [parents] are in survival mode [...] they don’t have time for these kinds of issues and are not aware of the dangers”. This highlights the difficulty of relying on voluntary engagement to reach those most at risk. A government representative added that “another major concern is the lack of understanding among parents about what children actually do online, especially the gap between parents’ perceptions and children’s real habits. This point was also supported by the U-Report unveiling how the highest demographic that responded with *not at all* understanding how content they see online is chosen, came from adults between the ages of 31-34 (Figure 8). Parents often believe that children use the internet for learning, when in reality, children spend hours on social media, most often without supervision.

Figure 8. Children, youth and adult’s answers regarding the extent to which they understand how the content they see online is chosen for them - Categoricalised by year. (n = 209)



This highlights a cross-generational gap in digital literacy, where preventive efforts in practice remain fragmented and insufficiently embedded in long-term strategies. As a result, many parents are not adequately equipped to support children's digital safety, weakening prevention at its primary level and limiting its reach among those most at risk.

4.3. Institutional Frameworks and Governance

Under the CRC and GC No. 25, States are expected to establish coordinated governance mechanisms and preventive approaches capable of protecting children's rights in the digital environment. This includes (a) clear institutional responsibilities, effective implementation, and cooperation across sectors and administrative levels⁴⁸; (b) protecting children from digital risks, including risks linked to private companies and digital platforms⁴⁹; and (c) through education, digital literacy and accessible support mechanisms.

Finding 7. BiH's governance framework for children's digital rights remains fragmented and reactive.

a. Fragmented governance and unclear allocation of responsibilities weaken coordinated child digital protection.

Given Bosnia and Herzegovina's decentralised governance structure established under the Dayton Agreement, this remains particularly difficult in practice. While decentralisation provides autonomy at different administrative levels, it also creates important inconsistencies in policy implementation and service provision for children.⁵⁰ The UNICEF Situational Analysis highlights overlapping responsibilities, fragmented legal standards and uneven outcomes across the country. In practice, laws and responsibilities vary across state, entity, cantonal and local levels.⁵¹

⁴⁸ Convention on the Rights of the Child, arts. 3, 4, 17 and 19; Committee on the Rights of the Child, General Comment No. 25 (2021), §§ 23-27.

⁴⁹ CRC articles. 3, 4 and 19; Committee on the Rights of the Child, General Comment No. 25 (2021), §§ 11, 23-27, 35 and 82-84.

⁵⁰ UNICEF Bosnia and Herzegovina (2025), *Situational Analysis of Children and Youth in Bosnia and Herzegovina*. UNICEF BiH, p. 21.

⁵¹ *Ibid.*, p. 22-23.

At the State level, responsibility for children's rights is distributed across several institutions. The Ministry of Human Rights and Refugees coordinates the implementation of CRC obligations, while the BiH Council for Children acts as an advisory and coordinating body under the Council of Ministers.⁵² In parallel, the Institution of Human Rights Ombudsman of BiH, through its specialised Department for the Protection of the Rights of the Child, independently monitors and addresses violations of children's rights.⁵³ However, the distribution of mandates across multiple bodies contributes to unclear institutional responsibilities and makes coordinated responses to digital risks affecting children particularly difficult in practice.⁵⁴ During interviews, stakeholders themselves pointed to different institutions when asked who was responsible for safeguarding children's digital rights, reflecting the absence of a clear lead authority through the diffusion of duty bearers.

Several interviewees also highlighted how existing initiatives remain partial and poorly coordinated. An NGO representative explained that a media literacy strategy had already been developed but was "resting in some drawers" with no implementation. Similarly, a government representative described current measures as fragmented, time-limited and not fully integrated into schools and institutions. These statements are confirmed by the Legal Analysis, which further shows that the fragmented and decentralised system diffuses responsibilities across multiple administrative levels, weakening coordination and accountability mechanisms.⁵⁵

Together, these governance gaps limit the development of coherent and coordinated governance mechanisms capable of responding to digital risks affecting children.

⁵² Ibid., p. 23.

⁵³ Institution of Human Rights Ombudsman of Bosnia and Herzegovina. (n.d.). *Department for the protection of the rights of the child.*, accessed May 12. <https://ombudsmen.gov.ba>

⁵⁴ UNICEF Bosnia and Herzegovina (2025), *Situational Analysis of Children and Youth in Bosnia and Herzegovina*. UNICEF BiH (p. 23); and Mušić, E. (2025). *Children in the digital environment – Implications of the creation and publication of user-generated content for children's rights: Legal analysis* [English translation of original document]. UNICEF Bosnia and Herzegovina, p. 22.

⁵⁵ Mušić, E. (2025). *Children in the digital environment – Implications of the creation and publication of user-generated content for children's rights: Legal analysis* [English translation of original document]. UNICEF Bosnia and Herzegovina, p. 22.

b. Existing governance mechanisms remain reactive and struggle to address transnational and rapidly evolving digital risks.

Existing legal frameworks in BiH were not designed to regulate digital platforms or address the specific digital rights implications affecting children. The Legal Analysis identifies a growing legal grey zone surrounding children's participation in digital spaces, particularly regarding algorithmic systems, online visibility and digital exploitation.⁵⁶ It further notes that digital developments evolve significantly faster than the legal concepts and governance mechanisms intended to regulate them.⁵⁷ As a result, important areas of children's digital experiences remain insufficiently covered by existing legal and institutional frameworks.

These challenges are further reinforced by governance and jurisdictional gaps within BiH itself. An NGO representative explained that governance divisions across entities are frequently exploited in cases of online harassment, highlighting situations where police authorities from one entity cannot intervene in another. In practice, this weakens the ability of institutions to respond coherently to digital harms that move rapidly across jurisdictions and online spaces.

The transnational nature of digital platforms creates additional governance challenges.⁵⁸ Several interviewees stressed the limited ability of domestic institutions to regulate large digital platforms. As one academic researcher stated, "they [Big Tech companies] are too powerful and they are not going to regulate themselves". The absence of legal representatives from major technology companies in BiH as an interviewee stated, further limits possibilities for accountability at the national level. This creates a significant gap, particularly regarding algorithmic systems, which shape children's behaviour and influence conditions of consent. This falls outside the reach of classical legal frameworks.⁵⁹

Although digital risks affecting children are transnational and increasingly common across states, differences in governance structures significantly shape the ability of institutions to develop coherent and coordinated responses.

In practice, responses to online harms therefore remain largely reactive rather than preventive. Existing initiatives are often focused on post-incident responses, while long-term mechanisms

⁵⁶ *Ibid. Op. cit.*, p. 3.

⁵⁷ *Ibid.*, p. 26 and 55.

⁵⁸ *Ibid.*, p. 26.

⁵⁹ *Ibid.*

capable of anticipating and mitigating emerging digital risks remain underdeveloped. External analyses similarly point to delays in aligning with evolving European digital governance frameworks.⁶⁰

In this context, a government representative highlighted the importance of BiH progressively aligning with evolving European digital governance frameworks, particularly the Digital Services Act. As an EU candidate country, this alignment is increasingly relevant for strengthening preventive and coordinated digital governance mechanisms.

c. Weak preventive frameworks leave child digital protection dependent on individual initiatives rather than coordinated institutional systems.

A government representative told us that preventive child digital protection in BiH still relies heavily on “individual initiatives and the willingness to take action”, rather than on coordinated institutional systems. Whether children receive guidance, support or protection often depends on the personal engagement of parents, teachers or other adults around them, rather than on clear and systematically implemented safeguarding mechanisms.

This is particularly visible in the education sector. While schools are often expected to play a central role in prevention, educational governance remains distributed across several responsible departments, and no unified national framework currently exists for digital literacy or online risk education.⁶¹ An expert in telecommunication law, explained how this absence of digital literacy education further deepens the legal grey zone identified, where neither legal frameworks nor educational institutions provide adequate protection, and where teachers and students are left without the necessary skills to navigate online spaces safely and critically.⁶²

This gap becomes especially significant considering that children themselves identify schools and teachers as key sources of support in navigating digital risks. The GC No. 25 notably highlights that children expect governments, schools and technology companies to help them

⁶⁰ IFEX. (2025). Bosnia and Herzegovina: Deadlock in digital platform regulation. IFEX. <https://ifex.org/bosnia-and-herzegovina-deadlock-in-digital-platform-regulation/>

⁶¹ United Nations Development Programme. (2024, November 30). *Creating a digital future for everyone*. UNDP Bosnia and Herzegovina.

⁶² Mušić (2025). *Children in the digital environment – Implications of the creation and publication of user-generated content for children’s rights: Legal analysis* [English translation of original document]. UNICEF Bosnia and Herzegovina, p. 3.

manage harmful and misleading online content.⁶³ Yet in practice, the quality of protection children receive still depends heavily on whether they encounter informed and engaged individuals rather than benefiting from consistent institutional safeguards.

This broader disconnect is also reflected through the voices of children and young adults when asked about their perceptions of political responsiveness. According to UNICEF’s U-Report survey, 84% of respondents stated that political leaders rarely or never listen to young people or consider their needs.⁶⁴ This suggests that preventive child digital protection in BiH remains insufficiently institutionalised, leaving protection uneven, inconsistent and highly dependent on individual circumstances rather than guaranteed systematically as a right.

4.4. Inclusion and Equity

Ensuring equitable and inclusive access to the digital environment is central to children’s rights in the digital environment, and is closely linked to SDG 10 (Reduced Inequalities). The CRC GC No. 25 requires States to guarantee equal and meaningful access to digital technologies, while giving particular attention to vulnerable situations, the gender divide, and equitable investments.⁶⁵ This section examines how these principles are implemented in BiH and identifies key gaps.

Finding 8. Digital inequalities persist, with rural areas and vulnerable children facing the most unequal access and risks

While most children in BiH participate in the digital environment, access to opportunities and exposure to risks remain uneven. As an NGO representative noted, there is no “specifically excluded group”, yet this widespread participation masks significant disparities in how children experience digital spaces. Children in rural areas are consistently identified as the most vulnerable. Nearly 65% of interviewees cited them as both more excluded from digital opportunities and more exposed to risks (Figure 9). These disparities stem from structural

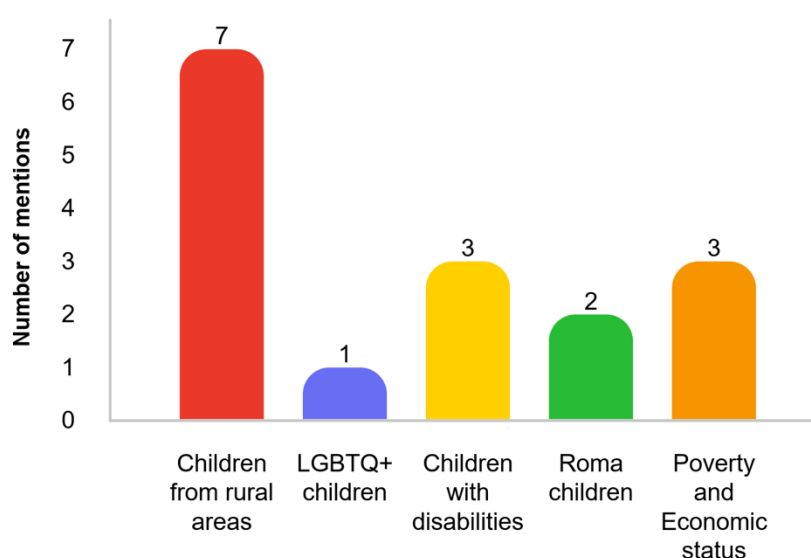
⁶³ Committee on the Rights of the Child, *General Comment No. 25 (2021) on children’s rights in relation to the digital environment*, §§ 3.

⁶⁴ UNICEF Bosnia and Herzegovina (2025), *Situational Analysis of Children and Youth in Bosnia and Herzegovina*. UNICEF BiH, p. 109.

⁶⁵ For further details, see §9, §11, §28, and §101-102, of the UNCRC General Comment 25.

barriers. As an NGO representative highlighted: “schools in rural areas [...], still in 2026, don’t have Wi-Fi”, while limited access to mobile data further restricts connectivity outside the home.

Figure 9. Groups of children most identified as excluded from digital opportunities or at higher risk online (interview responses; n = 11; multiple responses allowed)



Note: Interviewees could mention more than one group (n = 11).

Geographic inequalities also intersect with broader forms of vulnerability. Interviewees highlighted that rural contexts often overlap with low-income households and larger families, compounding exclusion already experienced offline by groups such as Roma children, children with disabilities, and LGBTQ+ children. In these cases, the digital environment tends to reproduce and amplify existing inequalities.⁶⁶

Marginalised groups face not only institutional barriers, such as limited recognition of their needs and rights, but also active prejudice and discrimination.⁶⁷ Children with disabilities and Roma children are disproportionately affected, facing compounded obstacles to education driven by stigmatisation and exclusion.⁶⁸

⁶⁶ Balkan Investigative Reporting Network, *Digital Rights Violations Annual Report 2025*, November 2025, p. 50.

⁶⁷ United Nations Development Programme (UNDP). (2021). *Social inclusion in Bosnia and Herzegovina: 2020 National Human Development Report*, p. 20” UNDP Bosnia and Herzegovina. https://files.acquia.undp.org/public/migration/ba/NHDR_2020_ENG.pdf

⁶⁸ United Nations Bosnia and Herzegovina, Country Analysis: Bosnia and Herzegovina 2024 (2024) <https://bosniaherzegovina.un.org/en/297734-country-analysis-2024>

Roma communities face some of the starkest challenges. In at least ten Roma settlements, electricity remains unavailable, severely constraining digital participation. Low school enrollment further limits exposure to digital learning: Roma children attend primary school at a rate of 69.3% and secondary school at just 23%.⁶⁹ A UNICEF survey comparing Roma and non-Roma school participation found a consistent pattern of compounded disadvantage, with Roma girls recording lower attendance than their male peers, revealing that intersecting inequalities reinforce one another.⁷⁰ Children excluded from formal education are far less likely to develop the foundational skills needed to navigate digital spaces safely and confidently, deepening cycles of exclusion along the same fault lines, ethnicity, gender, and socioeconomic status, that already disadvantage them offline.⁷¹

These gaps extend to children with disabilities, many of whom face an under-equipped school environment lacking accessible infrastructure, specialised support, and teaching assistants. This constrains both their educational outcomes and their ability to fully exercise their digital rights.⁷²

For LGBTQ+ children, digital spaces have taken on particular significance. With 64% of LGBTQ+ youth actively avoiding public spaces due to safety concerns, online engagement has become a primary form of social interaction, with 72% identifying digital spaces as central to their social lives. This reliance on digital environments makes meaningful, safe access not just an opportunity, but a protection issue that needs to be guaranteed.⁷³

Across these groups, access to and use of digital technologies remain shaped by geography, socioeconomic conditions, and identity. Children in rural and marginalised situations face compounded barriers to both digital opportunity and protection, reinforcing, rather than bridging, existing inequalities.

⁶⁹ Ministry for Human Rights and Refugees of Bosnia and Herzegovina, & Agency for Statistics of Bosnia and Herzegovina. (2013). *Multiple indicator cluster survey (MICS) on Roma in Bosnia and Herzegovina 2011–2012: Final report*.

<https://www.unicef.org/bih/en/reports/bosnia-and-herzegovina-roma-survey>

⁷⁰ United Nations Development Programme (UNDP). (2021). *Social inclusion in Bosnia and Herzegovina: 2020 National Human Development Report* UNDP Bosnia and Herzegovina, p. 54.

⁷¹ *Ibid.*, p. 46.

⁷² UNICEF Bosnia and Herzegovina. (2024). *Situation analysis of children and youth in Bosnia and Herzegovina*. UNICEF. <https://www.unicef.org/bih/en/reports/situation-analysis-position-children-and-adolescents-bosnia-and-herzegovina>

⁷³ *Ibid.*, p.74.

Finding 9. Gender disparities remain insufficiently recognised in the digital environment

Gender is a key dimension of digital inequality. Girls and boys do not experience the digital environment in the same way: they encounter different risks, different content, and different forms of algorithmic pressure. A UNICEF peer workshop reinforced this, showing that children can learn to identify concrete forms of online violence - including gender-based violence - and be equipped to report it and seek support.⁷⁴

However, gender did not emerge in any interview conducted for this research, despite being explicitly introduced as a discussion topic. This absence is notable: it suggests a gap in how digital inclusion is currently framed among stakeholders. This does not mean that gender is not considered important, but it indicates that it has not yet been systematically integrated into how digital inequality is understood and addressed.

This is particularly striking when compared to children's experiences. The Lanzarote report notes that awareness campaigns and protection systems are frequently designed with girls in mind, despite boys' significant exposure to violent and sexual content, image-based abuse, and identity-related harassment.⁷⁵ ⁷⁶ Boys also face a distinct vulnerability to radicalisation: those who feel alienated are increasingly targeted by extremist online communities, most notably the "manosphere", with social media algorithms amplifying harmful ideologies and deepening cycles of exclusion.⁷⁷ Across genders, a prevailing culture of silence around sexuality and stigma towards abuse victims further suppresses reporting and delays intervention.⁷⁸

A child's vulnerability online cannot be reduced to a single axis of disadvantage. Whether shaped by gender, ethnicity, sexuality, or socioeconomic status, risk is the product of interlocking, compounding conditions. Those carrying the weight of multiple intersecting barriers are, by consequence, the most profoundly exposed to harm. Addressing this requires

⁷⁴ UNICEF Bosnia and Herzegovina, *Online violence = real violence*, accessed May 12 2026, <https://www.unicef.org/bih/en/stories/online-violence-real-violence>

⁷⁵ BIRN, *op. cit.*, p. 20.

⁷⁶ Ministry of Human Rights and Refugees of Bosnia and Herzegovina, *Report of Bosnia and Herzegovina on "Protecting children from sexual exploitation and sexual abuse" for the Secretariat of the Lanzarote Committee: Consultations with children*, 2024, p. 7.

⁷⁷ UN Women. "What Is the Manosphere and Why Should We Care?" UN Women, accessed May 12, 2026. <https://www.unwomen.org/en/articles/explainer/what-is-the-manosphere-and-why-should-we-care>.

⁷⁸ Ministry of Human Rights and Refugees of Bosnia and Herzegovina. (2024). Report of Bosnia and Herzegovina on "Protecting children from sexual exploitation and sexual abuse" for the Secretariat of the Lanzarote Committee: Consultations with children, p.7.

not only identifying the distinct needs of girls and boys but also ensuring their voices actively shape the solutions designed for them.

5. Cross-country comparison with Montenegro and Croatia

This section identifies selected good practices from Montenegro and Croatia across key thematic areas, with a focus on their potential transferability to the context of BiH. The analysis highlights approaches that address similar challenges, while taking into account differences in governance structures and institutional capacity.

The number and type of practices identified vary across themes. In some areas, particularly governance, examples remain limited, reflecting the structural and context-specific nature of institutional reforms, which are less easily transferable than program-based initiatives.

Online Risks and Emerging Trends

Children and young people in BiH are increasingly being exposed to online risks that are harder to detect than in previous years, with growing consequences for their mental health and well-being. Acknowledging that this issue is a global phenomenon that also affects neighbouring countries, Montenegro and Croatia have adopted relevant good practices that we consider potentially transferable to the context of BiH.

In Montenegro, schools have been used as key entry points for mental health and psychosocial support. UNICEF and the Ministry of Education, Science and Innovation (MoESI) have positioned **schools as spaces where children and youth can access support**, including peer-based initiatives such as the *Study Buddy programme*.⁷⁹ This approach reflects the recognition that schools can serve as consistent and accessible points of contact for children, making them a practical channel for delivering support.

In Croatia, **strengthened counselling centres**, particularly in Zagreb and Split, have improved access to mental health services for children and young people.⁸⁰ This highlights the importance

⁷⁹ Education Coalition, *COVID-19 Education Responses in Developing Countries*, November 2021; British Council, *Screenagers: Socially distant, digitally close – Study of the impact of COVID-19 on youth in Western Balkans – Study report: Montenegro*, November 2021, p. 23-24.

⁸⁰ UNICEF Croatia, *Every child deserves a fair chance*. accessed May 12, 2026, <https://www.unicef.org/croatia/en/node/4761>

of embedding mental health support within familiar, existing, and accessible institutional environments, such as schools and local services.

Both cases unveil that effective responses to online risks tend to integrate support into spaces children already inhabit. This is particularly relevant for BiH, where fragmented governance and uneven service distribution could make the establishment of new, centralised mechanisms challenging. Building on existing institutions, such as schools, community centers, and peer networks, offers a more viable path forward.

Digital Literacy and Support Systems

BiH's digital literacy landscape is marked by decentralised support systems, low parental engagement, and insufficient capacity among both teachers and children to navigate online risks effectively.

Formal digital literacy education

Montenegro has developed a more integrated approach to digital learning, combining national platforms, school-based initiatives, and curriculum reforms, with digital literacy increasingly embedded within the education system. A central component is the ***Digitalna škola platform***, which integrates digital content into teaching across subjects and supports more interactive learning methods.⁸¹ As one international organisation representative noted, the country has developed “a new **education reform strategy that embeds AI literacy**, as well as the use of AI tools and digital pedagogy.” Dedicated programmes such as ***Tinkering with Tech*** further introduce digital skills at early stages of education.⁸²

In Croatia, digital literacy is addressed through both formal education and targeted initiatives. Elements of children's rights and digital responsibility are integrated into early education,⁸³ while programmes such as ***Tools for the Modern Age*** and the ***#Bolji Online*** initiative provide structured training for children, parents and teachers across the country.⁸⁴

⁸¹ Digitalna škola, *Digital School online portal*. Retrieved from: <https://www.digitalnaskola.edu.me/>

⁸² UNICEF Montenegro, *Schools for the 21st century*, March 2024. accessed May 12, 2026. <https://www.unicef.org/montenegro/en/stories/schools-21st-century>

⁸³ Trbojević, A., Borić, E., Hus, V., & Španović, S. “Implementation of content related to children's rights in schools: How to teach them? Perceptions of future teachers in Serbia, Croatia, and Slovenia,” *Education, Citizenship and Social Justice*, 18 (2), 2021, p. 131-146

⁸⁴ UNICEF Croatia, *Every child deserves a fair chance*. accessed May 12, 2026. <https://www.unicef.org/croatia/en/node/4761>

Together, these approaches highlight the importance of embedding digital literacy within formal education systems, complemented by structured and widely accessible initiatives, rather than relying on fragmented or short-term interventions, a gap that remains in BiH.

Parental engagement and multi-stakeholder approaches

Montenegro has adopted a **multi-level approach to digital literacy, targeting children, teachers and parents** through a combination of training, resources, and awareness-raising initiatives. Course content on the **Digitalna škola** platform has extended to address the prevention of bullying in online spaces and gender-based violence, with materials adapted to different target groups. Montenegro has also developed efforts to engage parents specifically, through targeted resources and courses on online safety and the **mediation of children's digital use**.⁸⁵ This approach helps create greater consistency between what children learn at school and the support they receive at home. Evidence suggests a rise in parental mediation of children's media use, indicating that awareness-raising efforts, particularly those led by CSOs and international organisations, are generating a measurable impact.⁸⁶

In Croatia, parental mediation strategies place greater emphasis on co-use and shared rules.⁸⁷ Evidence suggests that children often do not perceive clear boundaries, highlighting the importance of jointly agreed frameworks, such as **mutual media plans**, that combine guidance with autonomy. Initiatives such as the **#Bolji Online** programme further strengthens digital safety skills among children, parents, and teachers while increasing awareness of online risks.⁸⁸

Taken together, these cases highlight the importance of equipping both children and adults with the skills and tools needed to navigate digital environments. Both Montenegro and Croatia have moved beyond merely school-based approaches to active involvement of parents and caregivers as participants in children's digital safety, a shift that is particularly relevant for BiH, where the gap between school-based learning and home environments remains wide and largely unaddressed.

⁸⁵ Digital School Online Portal, *Parents and Guardian* section. accessed May 11, 2026.

<https://www.digitalnaskola.edu.me/en>

⁸⁶ Digitalni Trougao, *Strengthening Online Protection for Minors in Montenegro*, June 2025, p. 4.

⁸⁷ UNICEF Croatia, *Every Child Deserves a Fair Chance*. accessed May 12, 2026.

<https://www.unicef.org/croatia/en/node/4761>.

⁸⁸ UNICEF Croatia, *Every Child Deserves a Fair Chance*, accessed November 30, 2025.

<https://www.unicef.org/croatia/en/node/4761>.

Protection mechanisms and reporting systems

Montenegro and Croatia also offer concrete approaches to strengthening formal protection systems. In Montenegro, the **National SOS Children's Line (116-111)**, established with UNICEF support, provides a free, anonymous and confidential service, combining reporting, psychological support and guidance within a single, accessible mechanism.⁸⁹ In Croatia, tools such as the **“Red Button”** application enable children to report illegal content, exploitation and abuse in a more direct and user-friendly way.⁹⁰

Together, these approaches highlight the importance of accessible, child-friendly and well-integrated protection mechanisms that combine reporting with support. They also show that availability alone is not sufficient, and must be accompanied by strong visibility, trust and ease of use to ensure that children rely on these services.

Institutional Frameworks and Governance

BiH's institutional framework for children's digital rights remains fragmented and reactive, limiting the capacity of relevant institutions to respond coherently to fast-moving, cross-border digital risks.

Montenegro's recent progress in digital literacy is grounded in a more coherent and structured approach to education reform. Building on earlier diagnostic work, reforms have been developed within a broader framework where strategies, programmes and tools are designed to reinforce each other over time. This is reflected in initiatives such as the ***Digital, inclusive and transformative: Quality education in Montenegro*** project, which integrates multiple dimensions of digital learning within a single framework. As one international organisation representative noted, “in a way, it consolidated around ten years of work.” This approach highlights the importance and complexity of implementing a coordinated and long-term framework for digital education, ensuring consistency across policies, teacher training and learning content, rather than fragmented or unaligned interventions.

Croatia presents a different but complementary model, combining EU regulatory frameworks with national-level commitments and civil society-led initiatives. At the regulatory level,

⁸⁹ Child Helpline International, *Montenegro: National Child Helpline*, accessed May 11, 2026. <https://childhelplineinternational.org/montenegro-national-child-helpline/>

⁹⁰ Government of Croatia, *Protecting children online*. Retrieved from: <https://gov.hr/en/protecting-children-online/1236>

Croatia has **incorporated key EU frameworks**, including the GDPR⁹¹ ⁹², the DSA⁹³, the AVMSD⁹⁴, and the BIK+ Strategy⁹⁵, into its domestic legal framework.⁹⁶ Beyond governance, a landmark moment for civil society came in September 2024, when leading telecom providers signed the **Code for the Protection and Promotion of Children's Rights in the Digital Environment** at a UNICEF event. This agreement between the private sector and UNICEF demonstrates that the protection of children online is not the sole responsibility of governments, parents, or the education sector, but a shared obligation of civil society as a whole. This good practice shows the value of a multilateral approach that addresses the danger from a root cause rather than a crisis response after the online crimes have already occurred.

Both cases point to the fact that effective governance on children's digital rights depends not only on policies in place, but also on ensuring they are coordinated, sustained over time, and shared across institutional, private, and civil society actors.

Inclusion and Equity

In BiH, digital inequality remains pronounced, disproportionately affecting rural and vulnerable children, while gender disparities continue to be overlooked at the policy level. Montenegro offers a relevant point of comparison, as it faces structurally parallel challenges. Efforts to address digital inclusion in Montenegro also target regional inequalities, particularly in the north of the country. As one international organisation representative noted, this region is characterised by “lower economic indicators, the highest proportion of children affected by poverty, and a large number of children living in rural areas,” with many children lacking access to devices or adequately equipped schools. The ***Digital, Inclusive and Transformative: Quality Education in Montenegro*** initiative specifically targets this region to address these structural disparities.

⁹¹ DLA Piper, *Data Protection Laws of the World: Croatia*, accessed November 30, 2025.

<https://www.dlapiperdataprotection.com/?t=law&c=HR>.

⁹² Ius Laboris, “Croatia: The GDPR One Year On,” May 23, 2019, <https://iuslaboris.com/insights/croatia-the-gdpr-one-year-on/>.

⁹³ The law on the implementation was passed in April 2025, but there has been a delay in its implementation.

⁹⁴ Council of Europe, *AVMSD Transposition Information Sheet – Croatia*, accessed November 30, 2025.

<https://rm.coe.int/avmsd-transposition-info-sheet-hr-/1680a651f5>

⁹⁵ Better Internet for Kids, *Croatia – Safer Internet Centre*, accessed November 30, 2025. <https://better-internet-for-kids.europa.eu/en/sic/croatia>.

⁹⁶ Balkan Investigative Reporting Network, *Digital Rights Violations: Annual Report 2025* (2025), pg. 60, <https://balkaninsight.com/wp-content/uploads/2025/11/BIRN-Digital-Rights-Violations-Annual-Report-2025.pdf>.

Transferability to BiH and Summary

Legend:



Table 4. Online

Risks and Emerging Trends - Good Practices from Montenegro

Country	Good Practice	Stakeholders	Transferability to BiH
Croatia	Telecom-UNICEF Voluntary Code of Conduct on Children's Digital Rights and Online Safety	Telecom providers; UNICEF	
Montenegro	Parent-Focused Awareness Campaigns on Digital Guidance and Online Safety	NGOs; CSOs; IOs	
Croatia	Parental Mediation Through Co-Use and Shared Digital Tools	Government; CSOs; NGOs	
Montenegro	Schools as Entry Points for Children's Mental Health and Online Safety Support	Relevant Ministries of Education; UNICEF	
Croatia	School-Based Digital Safety Programme for Teachers	Academic institution; private sectors; schools	

Table 5. Digital Literacy and Support Systems - Good practices from Montenegro and Croatia

Country	Good Practice	Stakeholders	Transferability to BiH
Croatia	Multi-Stakeholder Digital Safety Education Initiative for Children, Parents and Teachers	Government; private sector; CSOs	
Croatia	CRC-Based Children's Digital Rights Education Integrated into School Curriculum	Relevant Ministries of Education; Schools	
Montenegro	Integrated Digital Learning Ecosystem Combining National Platforms, Schools, and Curriculum Reform	Relevant Ministries of Education; public authorities; UNICEF	
Montenegro	Multi-Level Digital Literacy Approach for Children, Teachers, and Parents	Relevant Ministries of Education; NGOs; civil society organisations; UNICEF	
Montenegro	National Child Helpline (116-111) Embedded Within the SIC+ Framework	Nova generacija; Government; UNICEF; NGOs; EU	

Table 6. Institutional Frameworks and Governance - Good practices from Montenegro and Croatia

Country	Good Practice	Stakeholders	Transferability to BiH
Montenegro	Long-Term Education Reform Framework Integrating Digital Literacy	Governmental Institutions; Relevant Ministries of Education; IOs	

Table 7. Institutional Frameworks and Governance - Good practices from Montenegro and Croatia

Country	Good Practice	Stakeholders	Transferability to BiH
Montenegro	Geographically Targeted Interventions to Address Disparities in Digital Education Access	UNICEF; Relevant Ministries of Education; Government	

Conclusion

Bosnia and Herzegovina has built a foundational legal and institutional framework for children's digital rights, yet persistent gaps remain between the mechanisms designed to protect them and their lived realities in the digital environment. Helplines and support systems are underused, and digital literacy initiatives could be strengthened. At the same time, the fragmentation of responsibilities across entities and cantons in combination with a generational gap, can leave dangers hidden from policymakers' view and add a diffusion of responsibility. To bridge this gap, BiH not only needs better tools, but better coordination recommendations accordingly.

This research unveiled four analytical themes: online risks and emerging trends, digital literacy and support systems, governance and institutional frameworks, and inclusion and equity. **First**, current governance frameworks and support systems for emerging online risks remain oriented towards protection after harm has occurred. A shift towards prevention, including early

detection mechanisms and proactive digital education, is of utmost importance. **Second**, the integration of broader and formal digital literacy programs targeting not only children but also caregivers, teachers and parents, into the formal education system is crucial. **Third**, the lack of coordinated governance in the safeguarding of the digital rights of children produces a heavy dependence on the individual circumstances of the adults that surround them. **Fourth**, children in rural areas or from marginalised communities should be placed at the forefront, considering inequalities in access, prevention, and protection are likely to deepen rather than diminish.

This study has limitations that future research should aim to address in more depth. The evidence base used in this report relied primarily on institutional sources and survey data, given the inability to interview children themselves and visit the schools they inhabit in order to represent them accurately. Future research should also examine dimensions this study could not cover in sufficient depth: the gap in online risk exposure and digital literacy between girls and boys, the growing influence of content relating to “the manosphere” in adolescent males, and the specific vulnerabilities faced by LGBTQ+ youth, a group flagged in both the 2024 UN BiH Youth Report⁹⁷ and the UNICEF BiH’s *Voices of Youth*⁹⁸ as facing compounded marginalisation.

When looking at the broader impact of this work in the field, this report serves as a springboard for future research, not a solution that is intended to stand alone. This report has built on findings from our desk review, interviews, and surveys, which are intended to bring value by serving as a foundation that others can build on. The addressing of gaps within academic writing is intended as a guide to real-life decision-making in the form of contributing to child protection frameworks, policy development, and applicable recommendations. This project contributes to a field where rigorous, accountable, and action-oriented research is still critically needed. This report has focused on tangible steps in a digital world that can not rely on a single universal mechanism.

⁹⁷ UNFPA & UNICEF, *Youth in Bosnia and Herzegovina*, 2025.

⁹⁸ UNICEF Bosnia and Herzegovina, *Voices of Youth* 2024, 2024.

Recommendations

1. Strengthen governance and coordination for children's digital rights

Establish a more coherent and accountable governance framework to address fragmentation and clarify institutional responsibilities across sectors and levels of government.

Key actions:

- Define clear roles and responsibilities for child digital rights across state, entity, cantonal, and local levels, with designated lead institutions;
- Establish a formal coordination mechanism (e.g. inter-sectoral working group or advisory body) bringing together relevant ministries, regulatory authorities, education actors, child protection services, and civil society at all levels of governance;
- Ensure alignment with international frameworks (CRC, General Comment No. 25, EU standards) and integration into existing strategies and reform processes;
- Support coordination with law enforcement and regulatory bodies to address emerging risks such as AI-generated harm and online exploitation.

2. Establish a BiH-wide coordinated digital competency framework

Move from fragmented initiatives toward a system-wide approach to digital literacy that equips children, educators, and caregivers with the skills needed to safely and meaningfully engage in the digital environment.

Key actions:

- Develop and implement a coordinated digital literacy framework across all education levels, adaptable to entity and cantonal contexts; include frameworks in non-formal education
- Integrate digital literacy, online safety, critical thinking, understanding of digital platforms into formal curricula;
- Embed digital competencies into pre-service and in-service teacher training systems, parental engagement and monitoring, ensuring educators are equipped to guide and support children;
- Develop structured engagement approaches for parents and caregivers, ensuring consistency between school-based learning and home environments.

3. Strengthen child protection systems in the digital environment

Enhance the accessibility, visibility, and effectiveness of formal protection mechanisms, with a stronger focus on prevention and early support.

Key actions:

- Formally recognise and institutionalise child helpline services (e.g. Blue Phone) as essential components of the child protection system;
- Ensure sustainable financing and align services with European standards, including the introduction and display of the 116 111 child helpline number; display the helpline number in all school premises;
- Integrate helpline awareness and access points within schools and other child-facing services; for example by distributing visibility materials such as QR codes and posters that can deepen understanding of AI and emerging risks;
- Strengthen referral pathways between schools, social services, helplines, and law enforcement to ensure timely and coordinated responses;
- Expand preventive approaches, including school-based outreach and peer support mechanisms, for example, the development of a student ambassador program where older students are trained to promote awareness and support among peers.

4. Ensure equitable access and inclusion in the digital environment

Address structural inequalities that affect children's ability to safely access and benefit from digital opportunities and protection.

Key actions:

- Invest in equitable access to digital infrastructure (internet connectivity, devices) across all schools, with priority given to rural and underserved areas;
- Integrate targeted measures for vulnerable groups, including Roma children, children with disabilities, and children in low-income or rural contexts;
- Combine strategies with geographically targeted interventions to reduce disparities in access, skills, and protection;
- Introduce indicators and monitoring mechanisms to track equity in access and outcomes.

5. Strengthen engagement with the private sector to protect children's digital rights

Promote shared responsibility for children's digital safety by engaging private sector actors, particularly telecom providers and digital platforms.

Key actions:

- Develop a formal child rights framework for engagement with telecom operators and digital service providers, aligned with international standards;
- Establish partnerships to promote safer digital environments, including responsible design, content moderation, and awareness-raising;
- Encourage voluntary commitments, codes of conduct, standards and monitoring that embed child rights considerations into digital services;
- Explore opportunities to align with broader initiatives on business and human rights and digital governance.

6. Promote a coordinated BiH-wide approach to awareness and engagement

Move beyond ad hoc campaigns toward a sustained, system-wide approach to raising awareness and building trust among children, parents, and educators.

Key actions:

- Develop a coordinated awareness and engagement strategy targeting children, parents, and educators, aligned with digital literacy and protection efforts; for example, carry out a campaign targeted to parents titled *"The other side of the screen: How would you act if you had the ability to see the invisible life of your child?"*
- Use existing platforms (e.g. school communication systems such as e-Dnevnik) to systematically reach caregivers;
- Combine digital and in-person approaches to ensure accessibility and reach across different population groups;
- Focus on building trust, improving communication between children and adults, and making support mechanisms visible and accessible.

Table 8: Implementation Roadmap

Recommendation	Action	Responsible Actor	Time Horizon	Urgency	Monitoring/ Evaluation Indicators
1. Strengthen governance and coordination for children's digital rights	Create a formal coordination mechanism with clear roles and responsibilities	Governance: State, Entity, Canton, and local levels	Medium Term		Independent oversight body with binding authority, supported by shared cross-institutional KPIs
2. Establish a BiH-wide coordinated digital competency framework	Implement a coordinated digital competency system	Ministries of Education	Long Term Investment		Regular digital literacy assessments, equity gap indicators
3. Strengthen child protection systems in the digital environment	Embed Blue Phone information systematically across the education system	Ministry of Human Rights and Ministries of Education	Short Term Quick Wins		Helpline call volume, say of children in U-Report who say they contact a helpline
4. Ensure equitable access and inclusion in the digital environment	Invest in equitable access to digital infrastructure and targeted measures for vulnerable groups	Governmental Institutions on state, entity and cantonal level and Ministries of Education	Long Term Investment		Implement clear indicators to monitor, reach and impact vulnerable groups, ensuring equitable access
5. Strengthen engagement with the private sector to protect children's digital rights	Strengthen accountability for children's digital rights	UNICEF and Telecom Operators / Private Sector	Short Term Quick Wins		Independent, evidence-based verification processes holding private sector actors accountable for child safety commitments
6. Promote a coordinated BiH-wide approach to awareness and engagement	Implementation of a knowledge-sharing platform and coordinated awareness	UNICEF, Ministries of Education, educators, and parents	Medium Term		Longitudinal trust and awareness surveys combined with behavior change indicators

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Annexes

Annex 1. U-Report survey questions

Methods	Themes	Questions
Closed-ended	General Use of Digital Tools	• How does using social media and online content make you feel? • How do you feel about how content is suggested to you online (what appears in your feed)?
	Online Risks and Emerging Threats	• Where do you feel the safest? • How do you react when you see something that makes you feel uneasy on the internet?
	Digital Literacy and Support Systems	• Do your parents/guardians set you a time limit on using your smartphone/tablet/computer? • Where did you learn the most about how to be safe online? • Do you feel that what you see online (videos, posts, content) is chosen for you in a way you understand?
Open-ended	Governance and Institutional Frameworks	• If you could change one thing about how apps and social media treat young people, what would it be?

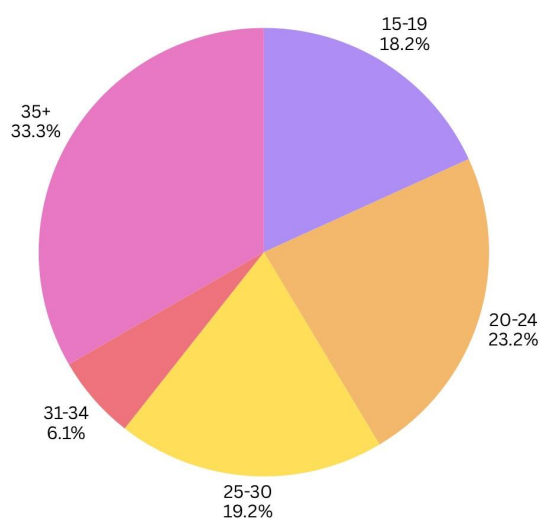
Annex 2. Statistics of U-Report respondents

Category	Details
Total number of responders	227
Response rate	88% / 145
Gender	Female 51%, Male 49%
Top response region	Federation of BiH with 179 responders of 202 respondents

Annex 3. U-Report Core Questions and U-Report Respondents data

Methods	Themes	Questions
Closed-ended	General Use of Digital Tools	- How does using social media and online content make you feel? - How do you feel about how content is suggested to you online (what appears in your feed)?
	Online Risks and Emerging Threats	- Where do you feel the safest? - How do you react when you see something that makes you feel uneasy on the internet?
	Digital Literacy and Support Systems	- Do your parents/guardians set you a time limit on using your smartphone/tablet/computer? - Where did you learn the most about how to be safe online? - Do you feel that what you see online (videos, posts, content) is chosen for you in a way you understand?
Open-ended	Governance and Institutional Frameworks	If you could change one thing about how apps and social media treat young people, what would it be?

Annex 4: U-Report Participants



Category	Details
Total number of responders	227
Response rate	88% / 145
Gender	Female 51%, Male 49%
Top response region	Federation of BiH with 179 responders of 202 respondents

Annex 5: Interview Consent Form

Interview Consent Form

Beyond the Click: Governing Childhood in the Digital Age in Bosnia and Herzegovina

Introduction

Thank you for your participation and contribution to our research. This informed consent form provides essential information regarding the project and seeks your consent as a participant.

We are a student research team from the Geneva Graduate Institute (IHEID) working alongside UNICEF BiH to conduct the ‘Beyond the Click: Governing Childhood in the Digital Age in Bosnia and Herzegovina’ project. This research is part of UNICEF's broader strategy to ensure

that children's rights are prioritized in the relevant policies and programs based on the Convention on the Rights of the Child (CRC).

Purpose of the Research

The purpose of this research is to explore how children can be protected from online risks and to conduct research on policies that align with the framework of CRC, taking into account good practices from neighbouring countries Croatia and Montenegro. Your participation will provide valuable insights into current challenges, solutions, and gaps in addressing these impacts. This information will guide UNICEF's future programming and advocacy efforts to better support children affected by climate change.

Research Method

The interview will last approximately 45–60 minutes and will focus on your experiences, knowledge of current efforts, and recommendations for addressing the effects of the digital sphere on children. The format will be a semi-structured interview, allowing you to share perspectives openly while ensuring a respectful and supportive environment.

Voluntary Participation and Risks

Participation in this interview is entirely voluntary. You may withdraw from the survey at any time without any consequences. Your decision to participate or not will not affect any services you may receive from UNICEF or related organizations.

Privacy and Confidentiality

Your privacy and confidentiality will be strictly protected. All responses will be anonymous, and no personal identifying information will be collected. Data will be stored securely (password-protected) and accessible only to the research team (IHEID) and UNICEF project manager until the final report is published.

Potential Recording

Please note that the interview may be recorded and transcribed for the accuracy of data collection. If you prefer not to be recorded, discussions can proceed without recording. The recordings and transcript will be kept confidential and accessible only to the research team (IHEID) and the UNICEF project manager temporarily until after the publication of the final report. If you have any concerns regarding recording, please discuss them with the research team in advance.

Contact Information

For any additional information or if you have any questions or concerns, please feel free to contact:

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Joanna Bourke Martignoni Faculty Lead - Applied Research Project Geneva Graduate Institute	joanna.bourke-martignoni@graduateinstitute.ch

Consent

The interviews will be conducted in full accordance with UNICEF Procedures for Ethical Standards in Research, Evaluation, Data Collection, and Analysis. By signing below, you confirm that you understand the purpose and procedures of this research and voluntarily agree to participate.

I understand what is required of me and approve of participation in this activity:

☐ Yes ☐ No

Participant's name: _____

Participant's signature: _____

Date: _____