

Office of the Child and Youth Advocate

Submission to the Department of Children, Seniors and Social Development regarding the Social And Economic Well-Being Plan

October 2022



**“The true measure of any society can be found in how it treats
its most vulnerable members.”**

-Gandhi

Introduction

The Office of the Child and Youth Advocate welcomes the opportunity to provide feedback to the Department of Children, Seniors and Social Development (CSSD) on the Social and Economic Well-Being Plan.

The Office of the Child and Youth Advocate is legislatively mandated by the **Child and Youth Advocate Act** to protect and advance the rights of children and youth in Newfoundland and Labrador. The Child and Youth Advocate is an independent statutory officer of the Legislature and carries significant authorities in this role. This Office provides public oversight of government programs and services to children and youth and helps young people by independently standing up for their rights and interests in dealing with child serving systems. Specific functions include investigations and reviews, individual and systemic advocacy, and public education on children and youth human rights.

This work is guided by the **United Nations Convention on the Rights of the Child (UNCRC)**, a comprehensive child rights framework that supports children's development and well-being.

The four guiding principles of the **UNCRC** are:

1. Non-discrimination – all rights apply to all children without exception.
2. Best interests of the child – this must be the first consideration in all decisions affecting children.
3. Life, survival and development – all children have the right to live and survive, and to develop to the maximum degree possible.
4. Participation – all children have the right to be heard and to participate in decisions affecting them in a way that is reflective of their age and developmental level.

The Convention exists because children and youth are a unique and vulnerable group and therefore require special protection of their rights. They cannot navigate systems like many adults can. Their views, experiences, and perspectives are frequently missing from public policy consultation, debate, and development. The Office of the Child and Youth Advocate urges the Provincial Government to meaningfully engage children and youth in the public consultation process, through in person focus groups that include children and youth from a wide range of socio-economic backgrounds. Article 12 of the **UNCRC** speaks to the importance of children's views being heard and listened to. Newfoundland and Labrador's Social and Economic Well-Being Plan must be informed by the views of children and youth.

Early Years

The early years of childhood are a crucial time for development. The **Health Accord of Newfoundland and Labrador** (2022) states that investing in our future is a priority, and that the Provincial Government needs to create a continuum of education, learning and socializing, and care for children and youth, from prenatal to adulthood. The Office of the Child and Youth Advocate understands the effects that Adverse Childhood Experiences, or ACEs, can have on children and youth. ACEs are potentially traumatic events that occur in childhood, such as experiencing violence, abuse, or neglect, witnessing violence in the home, and having a family member attempt or die by suicide. Also included are aspects of the child's environment that can undermine their sense of safety, stability, and bonding, such as growing up in a household with substance misuse, mental health concerns, or instability due to parental separation or incarceration of a parent, sibling or other member of the household. ACEs can have lasting effects throughout the lifecycle on health, behaviors, and overall well-being (National Center for Injury Prevention and Control, 2019). A life that starts with multiple ACEs can lead to disrupted neurodevelopment, social, emotional and cognitive impairment, adoption of health risk behaviors, impacts on life potential, disease, disability, social barriers, and early death. ACEs and their associated harms are preventable. Prevention and early intervention supports for families should be a key priority for the Social and Economic Well-Being Plan, especially in the areas of mental health, disabilities, and child protection. This would include more focus on brain health and the lifelong impacts of ACEs. All professionals that work with children and youth should receive trauma-informed training and subsequently adopt a trauma-informed focus in their work with young people.

Newfoundland and Labrador's public health clinics, parent resource kits, Healthy Beginnings, breastfeeding clinics, reduced childcare fees and childcare subsidies, family resource centres, community centres, and Brighter Futures are some examples of excellent resources for parents and young children. These resources should be better funded and expanded.

During the COVID-19 pandemic, public health clinics for children under five were only providing vaccinations, and parents were not provided with a thorough developmental screen of their child unless they reported concerns. The current wait time to see a Developmental Pediatrician at the Janeway is approximately 18 months. A shorter waitlist for developmental screening is desperately needed to provide children with early childhood intervention. The current parent resource kits provided by public health do not address language and literacy barriers such as deafness, English as a second language, or illiteracy, nor do they include comprehensive supports for parents of neuro-divergent children. Increased supports are needed for families of children with disabilities so children can develop to their full capacity and parents get the assistance they need to prevent caregiver fatigue and burnout.

In the Office of the Child and Youth Advocate's 2020 report, **The Sounds of Silence: Perspectives on the Early Education System's Response to Deaf and Hard of Hearing Children**, professionals and parents advocated for a mandatory reporting

and planning approach for each deaf and hard of hearing child. As soon as a child is identified as deaf or hard of hearing, a team of professionals should be engaged with the child, and also help parents navigate the system. It is important to have a multidisciplinary early intervention team with a coordinator or team lead. In the report, professionals and parents also talked of the value of involving deaf role models so parents and children can see from the outset that the future can hold opportunity, hope, and success.

While affordable, regulated childcare has arrived in NL with 10 dollar a day regulated childcare expected by 2023, there is a serious lack of available, accessible childcare spaces, in particular for children under age 2, for parents who are shift workers, and for children with exceptionalities such as behavior or communication challenges, deaf and hard of hearing, blind and visually impaired, language barriers, and intellectual and learning disabilities. Due to a lack of spaces and desperation, some parents have had to place their young, vulnerable children in caregiver homes that would not be their primary choice. As a result, families are often encouraged to utilize family and friends, however family-based childcare does not qualify for a subsidy. There is also significant red tape involved in opening your own regulated childcare space, which prevents many people from pursuing this line of service provision.

The Federal and Provincial Governments announced an agreement to transform early learning and child care in the province starting in 2022. Through this agreement, Newfoundland and Labrador will receive more than \$347 million between 2021-22 and 2025-26 to implement an ambitious **Early Learning and Child Care Action Plan**. The Office of the Child and Youth Advocate implores the Provincial Government to fulfill this plan, which would include working with a consultant to conduct labor force adjustment analysis specific to Early Childhood Educators in order to develop a wage-grid for them by the end of 2022, with full implementation by 2023. Pre-Kindergarten pilot spaces are also opening up this year, to be executed by the YMCA of NL. This is a pilot program in the early stages so, while promising, it is too soon to know what kind of impact this will have on childcare availability or quality of care.

It is generally accepted that children in care tend to have higher than average medical, emotional, developmental and educational needs (Fowler, 2008). Youth exiting care are not faring well in terms of social or financial well-being. As their guardian, CSSD is responsible for ensuring their needs are met. The rates for Youth Services benefits must be increased. More supportive staff are required to help youth secure housing and employment as well as to assist with scheduling and keeping appointments. CSSD's obligation to their children in care is to provide the types of services parents typically provide to their children so they can successfully transition to adulthood.

All children and youth should have access to comprehensive developmental and early learning supports from birth through school age and beyond. Ideally, all children would be followed by a dedicated pediatrician, but given the physician shortage in NL, the Provincial Government must find innovative ways to meet children and youth where they are and support families through those pivotal early years.

Education

The **Safe and Caring Schools Policy** (2013) is comprehensive and straightforward and includes many positive insights on how to increase safety, social-emotional learning, and relationship-building in schools. The Safe and Inclusive District Itinerant positions in the regions are an example of creative responses to the need for inclusivity. However, the Office of the Child and Youth Advocate has received many complaints over the years that the inclusion model is not working well for every student.

Support for deaf children in particular has been called into question with the Human Rights Tribunal for the case of Carter Churchill v Newfoundland and Labrador English School District, which revealed serious gaps in services for deaf and hard of hearing children within the school system. Services for deaf and hard of hearing children need to improve so the Provincial Government fulfills the commitment it made in 2010 when the School for the Deaf closed, to provide the best possible educational opportunities to students who are deaf and hard of hearing.

In general, for children with exceptionalities such as behavior or communication challenges, deaf and hard of hearing, blind and visually impaired, language barriers, and intellectual and learning disabilities, there seems to be no consistency across schools, and the conditions for these children in school can change from year to year depending on staffing and other resources. The **Premier's Task Force Report on Improving Educational Outcomes** (2017) highlighted issues with inclusive education, describing partial day programming as “the pretense of inclusion.” Partial day programming is often used as a means to deal with exceptionalities instead of it being a targeted, progressive plan of increasing support needs for specific children. It is a band-aid solution that is not serving students. The Office of the Child and Youth Advocate's 2019 report, **Chronic Absenteeism: When Children Disappear**, addresses partial day programming and highlights a need to ensure a shared response to absenteeism in schools, so that all children can access their right to a quality education, as per Article 28 of the **UNCRC**.

The Department of Education and the NLESD should review and examine the value of the Individual Support Services Plan (ISSP) and the Individual Education Plan (IEP) support process to ensure it is child-centered, trauma-informed, and working well for every child. Virtual technology provides a valuable opportunity for professionals to meet and address student needs. Children and their caregivers should have a consistent team of professionals they can rely on to support children through their school years, so that they do not have to retell their story every September, and wonder what kind of services they will receive each year. The Office of the Child and Youth Advocate reiterates the four recommendations from **Chronic Absenteeism** and urges they be fully implemented. The four recommendations called for an action plan focused on best practices, resources for pilots, community partnerships, staff development, and an evaluation plan, a policy to address and respond to chronic absenteeism, a policy about how and when to involve CSSD, and agreements on how all departments, school districts, and health authorities can collectively contribute to addressing this quiet, but significant issue.

The education system also needs to improve early childhood learning assessments. The current assessment time at grade three is too late, and children should be assessed for their social-emotional and learning needs starting in Kindergarten and every year thereafter. Assessments should be completed at the beginning and the end of every school year to ensure that children are able to reach their full potential with the appropriate supports.

The Provincial Government should continue their support of community organizations such as THRIVE and the Learning Disabilities Association of Newfoundland and Labrador to expand their programming within schools in order to better support youth.

The Schools Act (1997) was amended in 2018 to refuse admission of a student where it is determined that the presence of that student in a school is detrimental to the physical or mental well-being of students and staff. This same level of accountability does not exist to protect students from teachers and school staff. **The Schools Act** should be further amended so mechanisms are in place to address teacher and school staff misconduct, where the presence of an employee in the school is detrimental to students or staff due to inappropriate interactions and concerns that meet the standard of professional misconduct but do not meet the threshold of criminality. The Office of the Child and Youth Advocate issued a media release in November 2021 calling for better responses in student complaints of misconduct. There is an inherent power imbalance between students and their teachers. It is therefore critically important to make sure every possible measure is in place to protect young people in this relationship dynamic, including legislation that clearly allows for sanctions separate from legal consequences. The Office of the Child and Youth Advocate's **Submission to the Department of Education Regarding the Teacher Training Act** (2022) also highlights the need for enhanced teacher training, student centered protocol for investigating complaints, and greater transparency and accountability for disciplinary processes.

We have been pleased to see over recent years that the Department of Education expanded the Positive Actions for Student Success (PASS) program, allocating additional Student Success Teacher (SST) units and opening up eligibility to include students at the intermediate (grades 7-9) level. Such early interventions are key in responding to students who are at risk of leaving the education system.

Memorial University of Newfoundland provides a Youth Foster Support Program, which is a bursary for students who have been in foster care in NL for a minimum of 12 months. This bursary is valued at the cost of tuition and required fees for full-time undergraduate students, based on NL tuition rates for the 2022-2023 academic year. Each academic year this amount is adjusted as fees change. The bursary covers eight semesters of undergraduate study, including Marine Institute diploma programs. In order to be eligible, students must also demonstrate financial need, and there is a maximum of 20 students accepted in each academic year. Youth already receiving support through the Youth Services Program with CSSD are not eligible for this support. Pursuant to Policy 5.15 of the **Protection and In Care Policy and Procedure Manual**, youth who have signed a Youth Services Agreement, are engaged in a Youth Services plan with CSSD, and are in receipt of Residential Services are eligible to have post-secondary

education costs covered up to the age of 21. These youth shall be provided with financial support through CSSD to complete one post-secondary education program, which must be completed at post-secondary institutions in this province that are recognized by the Canada Newfoundland and Labrador Student Financial Assistance Program.

Both Memorial University's and CSSD's post-secondary programs are wonderful incentives to encourage post-secondary education for children in care. However, more focus is needed to ensure children in care finish high school. Barriers for Youth Services clients to complete school must be identified and addressed.

Young people who age out of care are overrepresented in terms of lack of education and homelessness. The High School Incentive Allowance should be extended to include low income working families instead of just those receiving financial assistance from the Income Support Program. There should be an expansion of community-based outreach to at-risk youth to assist them with attaining high school graduation or Adult Basic Education (ABE) so they can move on to post-secondary. There should be more funding for programs such as THRIVE's Youth at Promise, so there is no wait list for youth looking to achieve their educational goals. The current wait list for all educational programming at THRIVE is 30 people. When there is a wait list for these types of programs, youth move on quickly, and sometimes give up on education or regress. Additionally, ABE is specific to age 19 and above, which creates a gap for youth under 19 seeking to complete their education when the usual route to obtain high school credit is not a good fit for them. Eligibility criteria should be revised, to remove the age requirement for ABE, to remove the cap of 20 students accepted per academic year to MUN's Youth Foster Support Program, and to remove age and location of study criteria from CSSD's Youth Services post-secondary support.

As the only organization that independently represents the rights and interests of children and youth in NL, the Office of the Child and Youth Advocate believes that rights education should be a mandatory part of the school curriculum in NL. Every child and youth has rights, whatever their ethnicity, gender, religion, language, abilities or any other status. All young people have a right to learn about their rights and their responsibilities, and how to respect the rights and well-being of others.

The school districts should better engage parents and create school communities where families feel encouraged to participate and feel comfortable. For example, curriculum nights could be moved to community centres to better engage parents. One such past example that illustrates this flexibility was a decision of St. Teresa's School to move their curriculum nights to Froude Avenue Community Centre to connect with families and increase the participation of parents.

This month, the Teacher Allocation Review Committee released **Learning in a Time of Change: Report of Teacher Allocation Review Committee** (2022). This report calls for a vast array of improvements, including teacher recruitment and managing allocations, teacher accreditation and strategies, assessments, expansion of the Centre for Distance Learning and Innovation, a review of the junior high school program,

addressing class composition, reducing class size, and refocusing guidance and IRT work. While it is too soon to know how the recommendations contained in this report will impact the education outcomes of children and youth, the Office of the Child and Youth Advocate will be watching closely as the recommendations are implemented.

Income and Benefits

One strategy that the evidence tells us can prevent Adverse Childhood Experiences is strengthening household financial security and overall economic supports to families (National Center for Injury Prevention and Control, 2019). The Provincial Government announced there will be a 5 per cent increase in the Income Support basic rate effective November 1, 2022. While an increase in the amount of Income Support is a positive step forward, there are fundamental flaws in NL's Income Support Program.

Income Support is often seen as a long-term source of income, not as a means to bridge the income gap temporarily. There is a stigma attached to being on Income Support, and it often does not promote empowerment or boost self-esteem. The cost of living in NL is high, and those on Income Support, low and middle income families are all struggling. The Provincial Government needs to give serious consideration to the implementation of a Guaranteed Basic Income and a Living Wage on par with the rest of Canada and other countries, and in keeping with the current cost of living in NL. This initiative should be informed by up to date statistics on income and poverty, such as the Market Basket Measure, the official measure of poverty in Canada. The Office of the Child and Youth Advocate's report, **Making Waves: Ensuring Children Benefit from Child Support Payments** (2018) included 2015 statistics from the Newfoundland and Labrador Market Basket Measure, which showed that female-led lone parent families were the largest group living in extreme low income in NL. These statistics remained true in 2019, but have not been updated since then. Gender equity and equal pay should be priorities as this directly impacts children and youth living in female-led lone parent families. The NL Market Basket Measure should be updated annually to keep the public informed on low income statistics in the province in order to target those most in need of intervention.

As of 2020, Newfoundland and Labrador's low income prevalence was 6th out of 10 provinces at 7 per cent, and above the Canadian average of 6.4 per cent (Statistics Canada, 2021). A Guaranteed Basic Income and a Living Wage would be a transformative measure that could improve overall provincial well-being. Article 27 of the **UNCRC** states that children and youth have a right to a standard of living that is good enough to meet their physical and mental needs, particularly with regard to food, clothing and housing. Campaign 2000 (2022) is a cross-Canada public education movement to build Canadian awareness and support for the 1989 all-party House of Commons resolution to end child poverty in Canada by the year 2000. Campaign 2000 has been tracking progress against child and family poverty through their annual report cards since 1991. Almost all provinces and territories in Canada have produced their own annual report cards on child poverty, with the exception of Newfoundland and

Labrador, Quebec, and Nunavut. Our Provincial Government should make an effort to participate in these report cards.

There is little incentive for Income Support and Youth Services clients to go to work when their support is immediately cut once they start earning wages. These archaic rules around recovering support at the first sign of income does not encourage independence, empowerment, or the desire to seek long-term work. The Provincial Government needs to streamline reinstatement of benefits and remove barriers so individuals are not fearful of leaving Income Support to enter the workforce. The Income Support system has become arduous and faceless, and can be difficult to navigate. This is a lost opportunity for support and planning with some of the most vulnerable members of society.

Ultimately, it often costs less to remain on Income Support than to get a job. Getting a job requires a permanent address, childcare, and transportation, among other things. Individuals may also lose valuable benefits once they are working such as dental, prescription drug coverage, medical transportation, and paid utilities. The income tested eligibility process is demeaning, and for those with a family history of accessing Income Support, this often manifests as learned helplessness. The Income Support Program needs to work on boosting the self-esteem of clients, and address the multifaceted trauma that many individuals on Income Support have endured. In addition to trauma, barriers such as education, literacy, mental health, and a lack of concrete supports such as transportation and childcare prevent people from going to work.

Dental health for children and youth should be extended to include preventative work such as cleanings and fillings. After age 12, MCP only covers emergency dental work. This creates barriers as children grow up with unaddressed dental issues. Having dental issues can cause mental and physical health problems. MCP should expand and increase coverage and preventative measures to at least age 18.

Financial support for children with disabilities should not be income tested. Children have a right to supports regardless of their parents' income. Having a child with a disability should not become a financial burden for families. There should also be more supports for people wanting to enter and fully participate in the workforce who may have disabilities. The Provincial Government needs to create more inclusive communities and models of care that are supportive of people with exceptionalities and remove the stigma for people with specific support needs.

To better support low income families and those on Income Support, the Provincial Government should engage them as stakeholders to determine what would better assist their communities. Income and benefit solutions should be focused on empowerment and trauma supports. There should be opportunities to celebrate the successes of those who were able to leave Income Support and find meaningful work, and champion them as role models to engage others in their community.

Food Security

The cost of good quality, nutritious food is challenging for most families, given the current cost of living in NL. Rural and remote parts of the province pay even more for nutritious food. Recommendations 20 and 30 of the Office of the Child and Youth Advocate's **A Long Wait for Change: Independent Review of Child Protection Services to Inuit Children in Newfoundland and Labrador** (2019) reference food insecurity and housing for Inuit children and youth. The Report noted that the Provincial Government needs to work with Indigenous governments to review and update the level of financial support to reflect the Northern Labrador reality, and must address prices of goods and services as well as transportation and delivery costs.

The current School Lunch and Breakfast Programs are excellent initiatives that serve all children equally. These types of universal food programs, as well as Food First NL, should continue to be funded and expanded. Additional supports to community groups are needed so similar initiatives can pick up when the school year ends. Food banks, while well-meaning, are not meeting the food insecurity demand in the targeted, comprehensive manner that is needed. The Provincial Government should consider a universal food budget, with the majority of support going to those living in poverty. Partnering with private industry could result in programs where surplus supply of groceries is donated to local schools and community centres. Additionally, community food programs that supply daily meals need to be supported to provide a comprehensive, holistic approach to client care that addresses the fundamental activities, tasks and skills of daily living.

The overall prevalence of household food insecurity in Canada in 2021 was 15.9 per cent. While Newfoundland and Labrador did not score highest in prevalence, at 17.9 per cent we were higher than the Canadian average. The national rate of food insecurity among those 18 and under is one in five. More than one in four children (26.4 per cent) lived in a food-insecure household in NL in 2021. That equates to some 22,000 children. In addition, 68.8 per cent of households reliant on Income Support were food insecure (Household Food Insecurity in Canada, 2021). This is disturbing information that is highly troubling for the Office of the Child and Youth Advocate. More targeted measures are needed to increase food security in NL. The sugar tax, while aspirational, is perceived as punitive to low income families and not a realistic long-term cost measure.

Housing

There is currently a national housing and rental crisis. According to the Canada Mortgage and Housing Corporation's Rental Market Survey, the residential vacancy rate in Newfoundland and Labrador fell from 7.2 per cent in October 2020 to 3.4 per cent in October 2021. The average monthly rent for a two-bedroom apartment in the province in October 2021 was \$926, up from \$891 in October 2020 (Government of Newfoundland and Labrador, Budget 2022). There is a long list of residents of all ages in the province who cannot find appropriate accommodations. People are living in tents, and youth are couch surfing. Victims of violence are given support and priority for housing but still have to wait for availability. Some Youth Services clients and children and youth in care are staying in hotels. There is sometimes a lack of compatibility of where people are housed, with drug users, victims of violence, and even seniors being housed in the same buildings. These scenarios are unacceptable. There should be more coordinated planning to ensure everyone has a safe and affordable space to live.

There is positive work being done by organizations like Stella's Circle and NL Homelessness and Housing Network, but more funding and support is needed to expand and build these types of programs. The Provincial Government, in partnership with local community groups and corporate sponsors, could invest in more housing infrastructure. The province should consider championing the use of old schools, churches, or vacant buildings for housing opportunities. Programs could offer wrap around, holistic services so no one is living in unsafe conditions.

Newfoundland and Labrador Housing (NL Housing) should work toward a zero vacancy approach to housing. There should not be derelict, vacant houses when people are waiting to be housed. Repairs need to be completed in a timely manner and there is no excuse for the length of time some units have been vacant. NL Housing has a mandate to appropriately house individuals in need of housing. This may require an increase in human resources or other measures to bring the process of repairs and filling vacancies up to standard.

There should be public education campaigns and supports for individuals renting private apartments, to reduce stigma and to deter the avoidance of renting to low income individuals, and those involved with NL Housing. Tenants and landlords need to be supported in this process and throughout the rental relationship.

According to **Without a Home: The National Youth Homelessness Survey** (2016), 20 per cent of the homeless population in Canada is comprised of youth between the ages of 13 and 24. In a given year, there are at least 35 to 40 thousand youth experiencing homelessness. They may be temporarily living in hostels, staying with friends, living in "squats," renting cheap rooms in boarding houses or hotels, or living on the streets. The report also says youth may be living with parents or relatives, while at imminent risk of losing their shelter. The reality is that over the course of time many youth experiencing homelessness move between these various housing situations. The instability of housing is partially what characterizes their homelessness. The Provincial Government must have up to date statistics similar to **Without a Home** on children in core housing

need in NL, particularly those in rural and remote communities. There should be more housing options generated, particularly for youth exiting provincial care. A grassroots approach may help, and community groups require support from the Provincial Government to fulfill their housing mandates.

One example of a positive housing initiative is Choices for Youth's The Lilly. The Lilly is a 14 unit, congregate living supportive housing model for youth. Both the programming and the physical layout of the building promote a sense of community, while maintaining individual home spaces in a youth-friendly environment. Youth work with staff through individual support models aiming to remove lifestyle, housing, educational, and employment barriers to find security and stability. The building consists of one and two bedroom units, with shared community spaces in the larger kitchens and eating areas, as well as in the living, recreational, music, and art spaces. Youth who live at The Lilly take part in a variety of community programming, including group sessions, camping and hiking trips, yoga and meditation, drumming circles, and goal-setting sessions. To live at The Lilly, youth must also be prepared to engage in employment or educational training programs. More options like The Lilly should be replicated for children, youth, and their families seeking safe, secure housing, and should be universal, without employment or educational program requirements.

Community

Sense of belonging has to start in the early years, with parents and extended family building a sense of community with schools, professionals, and community centres. Those who feel valued will contribute positively, show empathy, and care for fellow residents. Belonging is a basic human need and motivation. The children and youth who contact the Office of the Child and Youth Advocate often do not feel a sense of belonging or community. They are often marginalized, have had to fight for resources and equity, and have not had their rights advanced or upheld. They have had challenges navigating systems. They are often not included in engagement opportunities. For example, youth have told our Office they would like to be involved in school curriculum reviews.

The Social and Economic Well-Being Plan should be informed directly by the views of children and youth. This means seeking the views of children and youth where they are, being authentic, wanting to learn and stay current with what is important to young people, and recognizing the importance of social connections and their relationship to well-being. The economy should provide people with equal opportunities for advancement, a sense of social inclusion and stability, all of which contributes to human resilience. The Social and Economic Well-Being Plan should offer a promising path toward social well-being. Separate social policies related to income and housing outside of the **Health Accord** can also have a significant impact on health and well-being. Government must move away from traditional economic models and get at the root of social issues.

Community organizations for children and youth such as THRIVE and Choices for Youth require consistent funding and deserve respect and recognition for the valued work they do. The Department of Children, Seniors and Social Development should acknowledge and involve community organizations as part of the circle of care for children and youth. Community organizations fill vital gaps in existing systems. Funding should be provided in longer blocks so less time has to be spent each year on grant and proposal writing. A program like Blue Door which helps the most vulnerable in society, some of whom are youth, should not have to worry about funding. With funding comes progress reports, surveys, and public relations. Youth have told our Office that the expectation to tell their story repeatedly, and to volunteer their picture for marketing of particular funded programs can be exploitative and re-traumatizing.

Public libraries should continue to be supported and expanded. Public libraries offer opportunities to not only build literacy and education skills but provide connection and a sense of community, especially for parents and children. It is important to foster safe spaces in our community, such as parks, libraries, green spaces and community gardens that are age-friendly and child-friendly.

The Provincial Government should consistently seek out the views of its most vulnerable citizens. It is important to reduce barriers and stigma for those with disabilities, women and girls, those who are gender-diverse, culturally or ethnically diverse, Indigenous, and neuro-divergent people. There is still a need for robust poverty elimination and violence prevention initiatives.

Conclusion

The Office of the Child and Youth Advocate will continue to advocate for young people by identifying gaps in youth serving systems. Newfoundland and Labrador needs a comprehensive Child and Youth Well-Being Plan. Children and youth are not always visible in larger strategies and reviews, such as the **Health Accord**, or the **Mental Health Care and Treatment Act**. Our Submission on the **Mental Health Care and Treatment Act Evaluation** (2022) highlights the importance of recognizing young people as rights holders and the obligation of governments as duty bearers to uphold these rights and give priority to the best interests of children. The Social and Economic Well-Being Plan should uphold the same standard, and involve a fulsome youth engagement policy for future social and economic reviews and evaluations, informed by guidelines on consulting with young people.

Additionally, CSSD should consider applying a Child Rights Impact Assessment to inform the Social and Economic Well-Being Plan. Article 3 of the **UNCRC** speaks to upholding the best interests of the child. A Child Rights Impact Assessment is a process that supports a systematic focus on the rights, needs and interests of children affected by the decisions and actions of governments, institutions and others. Applying a Child Rights Impact Assessment to the Social and Economic Well-Being Plan would require some extra work, such as cross-jurisdictional research on how to best apply the assessment to NL. This extra effort would be worth the investment in time and resources to amplify children's rights. No child should be homeless, food insecure, live in poverty, lack education or opportunity, or feel like they do not belong. The Office of the Child and Youth Advocate expects to measure success of the Social and Economic Well-Being Plan through concrete statistics showing reduction in poverty for children and youth, an increase in their food security, safe and affordable housing success, positive school and mental health outcomes, and an increase in their sense of belonging and feeling heard. The Office of the Child and Youth Advocate welcomes future opportunities for collaboration on this plan, to assist the Provincial Government in engaging and amplifying the views of young people throughout the social and economic planning process.

Appendix: Summary of All Proposed Considerations for the Social and Economic Well-Being Plan

- Meaningfully engage children and youth in the public consultation process, through in person focus groups that include children and youth from a wide range of socio-economic backgrounds.
- Develop a comprehensive Child and Youth Well-Being Plan in consultation with the Office of the Child and Youth Advocate, and most importantly, children and youth.
- Recognize young people as rights bearers, and fulfill the Provincial Government's obligation as duty bearers to uphold these rights and give priority to the best interest of the child.
- Involve a fulsome youth engagement policy for future social and economic reviews and evaluations, informed by guidelines on consulting with young people.
- Apply a Child Rights Impact Assessment to inform the Social and Economic Well-Being Plan.
- Evaluate the Social and Economic Well-Being Plan and measure success through concrete statistics showing reduction in poverty for children and youth, an increase in their food security, safe and affordable housing success, positive school and mental health outcomes, and an increase in their sense of belonging and feeling heard.

Early Years

- Prevention and early intervention supports for families, especially in the areas of mental health, disabilities, and child protection. This would include more focus on brain health and the lifelong impacts of Adverse Childhood Experiences (ACEs).
- All professionals that work with children and youth should receive trauma-informed training and subsequently adopt a trauma-informed focus in their work with young people.
- More funding and expansion of current initiatives such as public health clinics, parent resource kits, Healthy Beginnings and Brighter Futures programs, breastfeeding clinics, affordable and accessible childcare, Family Resource Centres and community centres.
- Eliminate the wait list to see a Developmental Pediatrician at the Janeway.
- Diversify Parent Resource Kits provided by public health to be inclusive of language and literacy barriers such as deaf and hard of hearing, blind and visually impaired, English as a second language, illiteracy, and neuro-divergent families.

- Increase supports for families of children with disabilities so these children can develop to their full capacity and parents get the assistance they need to prevent caregiver fatigue and burnout.
- Introduce a mandatory reporting and planning approach for each deaf and hard of hearing child, including a multidisciplinary early intervention team, and the involvement of deaf and hard of hearing mentors for children.
- Increase accessible, quality childcare spaces, in particular for children under age 2, for parents who are shift workers, and for children with exceptionalities such as behavior or communication challenges, deaf and hard of hearing, blind and visually impaired, language barriers, and intellectual and learning disabilities.
- Fulfill the **Early Learning and Childcare Action Plan**.
- Give particular attention to children in care, particularly those transitioning to adulthood, such as increasing the rates for Youth Services benefits and providing more supportive staff to help youth secure housing and employment as well as assist with life skills.

Education

- Increase support for deaf and hard of hearing children to provide the best possible educational opportunities and outcomes.
- Review and examine the value of the Individual Support Services Plan (ISSP) and the Individual Education Plan (IEP) support process to ensure it is child-centered, trauma-informed, and working well for every child.
- Fully implement the four recommendations from **Chronic Absenteeism** (2019) which call for an action plan focused on best practices, resources for pilots, community partnerships, staff development, and an evaluation plan, a policy to address and respond to chronic absenteeism, a policy about how and when to involve CSSD, and agreements on how all departments, school districts, and health authorities can collectively contribute to addressing this quiet, but significant issue.
- Improve early childhood learning assessments to identify social-emotional and learning needs starting in Kindergarten instead of Grade 3. Complete these assessments at the beginning and end of every school year to ensure children are able to reach their full potential with the appropriate supports.
- Continue and expand support for community organizations such as THRIVE and Learning Disabilities Association of Newfoundland and Labrador to expand programming within schools in order to better support youth.
- Further amend **The Schools Act** so mechanisms are put in place to address teacher and school staff misconduct where the presence of an employee in the school is detrimental to students or staff but the concern does not meet the threshold of criminality.
- Enhance teacher training, student-centered protocol for investigating complaints, and greater transparency and accountability for disciplinary processes.

- Extend the High School Incentive Allowance to include low income working families instead of just those receiving financial assistance from the Income Support Program.
- Expand community-based outreach to at-risk youth to assist them with attaining high school graduation or Adult Basic Education so they can move on to post-secondary.
- Increase funding for programs such as THRIVE's Youth at Promise, so there is no wait list for youth looking to achieve their educational goals.
- Revise eligibility criteria, to remove the age requirement for Adult Basic Education, to remove the cap of 20 students accepted per academic year to MUN's Youth Foster Support Program, and to remove age and location of study criteria from CSSD's Youth Services post-secondary support.
- School districts need to better engage parents and create school communities where families feel encouraged to participate and feel comfortable.

Income and Benefits

- Give serious consideration to the implementation of a Guaranteed Basic Income and Living Wage on par with the rest of Canada and other countries, and in keeping with the current cost of living in NL.
- Prioritize gender equity and equal pay as this directly impacts children and youth of female-led lone parent families, the largest group living in extreme low income in NL.
- Annually update the NL Market Basket Measure to keep the public informed on low income statistics in the province in order to target those most in need.
- Participate in Campaign 2000's annual provincial and territorial report cards on child poverty.
- Streamline reinstatement of Income Support benefits and remove barriers so individuals are not fearful to leave Income Support and enter the workforce.
- Increase in person contact with Income Support staff as an opportunity for support and planning with vulnerable clients.
- Review and revise the Income Support Program to remove the income tested eligibility criteria, and boost the self-esteem of clients by addressing the multifaceted trauma that many service users have endured.
- Extend dental health coverage for children and youth at least up to age 18, including preventative work such as cleanings and fillings.
- Eliminate income tested financial support for children with disabilities.
- Increase supports for people with disabilities wanting to enter the workforce.
- Create more inclusive communities and models of care that are supportive of people with exceptionalities in the workforce and remove the stigma for people who have specific support needs.

- Engage low income families and those on Income Support as stakeholders to determine what would better assist their communities. Focus on empowerment and trauma supports. Create opportunities to celebrate the successes of those who were able to leave Income Support and find meaningful work, and champion them as role models to engage others in their community.

Food Security

- Fully implement Recommendations 20 and 30 from **A Long Wait for Change** (2019) which reference food insecurity and housing for Inuit children and youth. Work with Indigenous governments to review and update the level of financial support to reflect the Northern Labrador reality, and address the prices of goods and services and the cost of transportation and delivery.
- Continue to fund and expand universal food programs such as the School Lunch and Breakfast Programs that serve all children equally. Fund additional supports to community groups so similar initiatives can pick up when the school year ends.
- Community food programs that supply daily meals need to be supported to provide a comprehensive, holistic approach to client care that addresses the fundamental activities, tasks, and skills of daily living.
- Consider a universal food budget, with the majority of support going to those living in poverty.

Housing

- Invest in more housing infrastructure, and champion the use of old schools, churches, or vacant buildings for housing opportunities.
- Increase funding and support for community programs to offer wrap around, holistic services so no one is living in unsafe conditions.
- Work toward a zero vacancy approach at NL Housing. Bring the process of repairs and filling vacancies up to standard. There should be no vacant homes when people are waiting to be housed.
- Introduce public education campaigns and supports for individuals renting private apartments, to reduce stigma and deter avoidance of renting to low income individuals, or those involved with NL Housing or CSSD. Support tenants and landlords throughout the rental relationship.
- Update provincial statistics on children and youth in core housing need, particularly in rural and remote communities.
- Generate more housing options for youth exiting provincial care.
- Support community organizations to fulfill their housing mandates.
- Provide children, youth and their families with safe, secure, holistic housing that does not have eligibility requirements such as mandatory engagement in educational or employment programs.

Community

- Be informed by the views of children and youth by meeting them where they are, being authentic, wanting to learn and stay current with what is important to young people, and recognizing the importance of social connections and their relationship to well-being.
- Move away from traditional economic models and get at the root of social issues.
- Consistently fund community organizations such as THRIVE and Choices for Youth and acknowledge them as part of the circle of care for children and youth. Provide funding in longer blocks so less time has to be spent each year on grant and proposal writing.
- Continue and expand support for age-friendly and child-friendly public libraries, and other safe spaces such as parks, green spaces, and community gardens.
- Reduce barriers and stigma for those with disabilities, women and girls, those who are gender-diverse, culturally or ethnically diverse, Indigenous, and neuro-divergent people.
- Revitalize poverty elimination and violence prevention initiatives.

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