



November 8, 2024

Hon. Dennis King
Hon. Hal Perry
MLA Karla Bernard

Dear Premier and Interim Leaders of the Official Opposition and Third Party,

Re: Child and Youth Advocate Office Response to Minister's Directive on Responsible Use of Communication and Information Technology (MD 2024-06) and Public Schools Branch Operational Procedure on Personally-Owned Mobile Devices in Schools (Consultation Working Draft): November 2024

I am pleased to provide the attached Child and Youth Advocate Office Response to Minister's Directive on Responsible Use of Communication and Information Technology (MD 2024-06) and Public Schools Branch Operational Procedure on Personally-Owned Mobile Devices in Schools (Consultation Working Draft): November 2024.

I commend both the Department of Education and Early Years and the Public Schools Branch for its due diligence in addressing these important matters. Our Office is generally supportive of Prince Edward Island following the lead of other Canadian jurisdictions in introducing policies to limit the use of personally-owned mobile devices by students in schools. Having said that, our Response highlights a number of questions and concerns from a child and youth rights perspective, which include:

- The Minister's Directive does not clearly define objectives and will thus be difficult to assess for success, such as the avoidance of distractions and disruptions and the promotion of digital citizenship and literacy education.
- Neither the Minister's Directive nor the PSB Operational Procedure explicitly consider the UNCRC Rights of Children and Youth that may be impacted.
- Neither the Minister's Directive nor the PSB Operational Procedure explicitly reference policy guidance on cyberbullying/student safety.
- The expectation that Responsible Use Agreements are to be signed by students registered in grade 4 and above and by parents/guardians (with the possibility of increasingly severe sanctions) raises the question of voluntariness and would be better addressed through a simple written Acknowledgement of receipt and understanding of the expectations of students.
- Both the Minister's Directive and the PSB Operational Procedure should be written in less technical and more youth-friendly language (a concern raised in an earlier submission by this Office's Child and Youth Advisory Committee).
- Neither the Minister's Directive nor the PSB's Operational Procedure provide clarity regarding school monitoring and enforcement of the use of personally-owned mobile devices during unstructured times (breaks, lunch, on the bus) and in unsupervised spaces (bathrooms, change rooms, cafeterias) (a concern raised in an earlier submission by this Office's Child and Youth Advisory Committee).

- In the event that the student is required to surrender their personally-owned mobile device to an educator, neither the Minister's Directive nor the PSB Operational Procedure speak to the responsibility of the educator to ensure the security and safety of the device (a concern raised by this Office's Child and Youth Advisory Committee).
- The list of exceptions in the PSB Operational Procedure is limited and does not include translation services (a concern raised in an earlier submission by this Office's Child and Youth Advisory Committee).
- It is unclear if a student can claim an exemption on their own "for educational purposes, for health and medical purposes, or in support of special education needs", or if the request for an exemption must be forwarded by a parent or guardian.
- If an exemption request is denied, it appears that only a parent or guardian would have the right to appeal that decision and not the student themselves (a gap in the PEI *Education Act* that is the subject of unfulfilled Recommendations from our Office and from the Standing Legislative Committee on Education and Economic Growth, as previously constituted).
- As the Minister's Directive and PSB Operational Policy reference consequences for non-compliance, up to and including student suspension, the student should also have the right to appeal suspension decisions without the consent of their parent or guardian (once again, a gap in the PEI *Education Act* that is the subject of unfulfilled Recommendations from our Office and the Standing Legislative Committee on Education and Economic Growth, as previously constituted).

Notwithstanding the above-mentioned concerns, I am encouraged by the positive feedback from our Office's Child and Youth Advisory Committee that distractions and disruptions from personally-owned mobile devices in classrooms have, so far, been reduced. This supports the rights of children to learn and have access to a quality education (UNCRC articles 28 and 29).

Finally, I advise the Department of Education and Early Years and the Education Authorities to continue to collect feedback through the school year to evaluate and amend the Minister's Directive and the PSB Operational Procedure, as appropriate. As part of that evaluation process, it is imperative that the voices of children and youth be heard and given due weight. Our Office and its Child and Youth Advisory Committee should also be consulted.

Respectfully,



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 Child and Youth Advocate
 Office of the Child and Youth Advocate

cc: Hon. Minister Rob Lantz
 Deputy Minister Erin McGrath-Gaudet
 Tracy Beaulieu, Director, Public Schools Branch
 Ghislain Bernard, Superintendent, La Commission scolaire de langue française
 Brad Trivers, Chair, Standing Legislative Committee on Education and Economic Growth
 Samantha Lilley, Committee Clerk (for distribution to Committee members)



PRINCE EDWARD ISLAND

Child and Youth
ADVOCATE

Response to:

**Minister's Directive on Responsible Use of Communication and
Information Technology (MD 2024-06)**

and

**Public Schools Branch Operational Procedure on Personally-Owned
Mobile Devices in Schools (Consultation Working Draft)**

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(Consultation Working Draft)
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Background

On July 16, 2024, the Department of Education and Early Years released its new Ministerial Directive on Responsible Use of Communication and Information Technology (MD 2024-06), providing updated guidance on the use of personal mobile devices in Island schools. In Fall 2024, the Public Schools Branch (PSB) released a consultation draft of its Operational Procedure on Personally-Owned Mobile Devices in Schools, which is to provide direction on the implementation of the Ministerial Directive for school administrators, teachers, and staff, as well as students and their parents/guardians.

The Office of the Child and Youth Advocate (OCYA) has examined the Ministerial Directive (MD 2024-06) and the PSB Operational Procedure through a child and youth rights lens, drawing on the United Nations Convention on the Rights of the Child (UNCRC) to inform our response. Additionally, we conducted a jurisdictional scan of school Responsible Use of Technology Policies and Agreements and of policies regulating the use of personal mobile devices (PMD) in schools across Canada. The Department of Education and Early Years (DEEY) provided the OCYA with a briefing regarding the Ministerial Directive in August 2024. The OCYA's Child and Youth Advisory Committee has also provided feedback on the Directive and Operational Policy from the perspective of students experiencing the implementation of new guidelines in practice. The OCYA is generally supportive of Prince Edward Island following the lead of other Canadian jurisdictions in introducing policies to limit (i.e., not ban) the use of personal mobile devices by students in schools; however, the Office highlights its questions and concerns below.

Authority of Child and Youth Advocate

While there may be timelines put out to the public and general stakeholders for feedback, which the OCYA may wish to observe, the OCYA is not bound by those timelines. Here, it is important to note that the OCYA is not that of a general stakeholder and has a unique statutory role in PEI. Pursuant to clause 12(1)(e) of the *Child and Youth Advocate Act*, the Advocate has the authority for "promoting the rights of children and youth in relation to Government legislation, policies, protocols, practices and reviewable services to children and youth." As well, pursuant to clause 12(2)(h) of the *Child and Youth Advocate Act*, the Advocate has the further authority to "advise and make recommendations to any public body or community organization responsible for providing reviewable services to children and youth on any matter relating to the rights, interests and well-being of children and youth."

Ministerial Directive on Responsible Use of Communication and Information Technology (MD 2024-06)

The OCYA is encouraged that the members of the Child and Youth Advisory Committee have observed positive changes in the reduction of PMD use and visibility in classrooms during the start of the 2024-2025 school year and hopes that their feedback submission will provide helpful guidance to the PSB and DEEY as they continue to develop policies and practices relating to the use of PMDs in schools.

Aims and Objectives

The underlying goal of the Ministerial Directive is not made explicit: is the objective of restricting PMDs in schools to reduce distractions to the learning environment? To reduce the occurrence and impacts of cyberbullying? A combination of these goals? The text of the Directive does not contain the words “distraction” or “focus”; and only references bullying and cyberbullying in the context of unacceptable uses of communication and information technology (CIT). PEI’s Ministerial Directive appears to be an outlier among similar directives from other Canadian jurisdictions, as it does not explicitly define objectives combining the reduction of classroom distractions, improvements to student mental health, and protecting students from the harms of inappropriate technology use. Without a clear articulation of the intent of the Directive, evaluating its effectiveness will be challenging.

The OCYA notes that MD 2024-06 is written through a disciplinary lens and does not substantively commit the DEEY to enriching the province’s digital literacy curricula and increasing in-class instruction time devoted to cyber safety and citizenship. Neither does the Directive link to the broader systemic concerns of child and youth mental health or provide a meaningful tool to discourage and reduce bullying and cyberbullying. Clause 11 of the Ministerial Directive refers to “filtering software” on the school network but does not explicitly reference blocking or restricting social media at school as is seen in several other jurisdictions. Furthermore, the requirements to connect to the school network in clauses 18 and 19 of the Directive are not further operationalized in the PSB Procedure. While students in grades 4-12 must sign a responsible use agreement committing to only access the school network, it is unclear how students and parents are given network connection instructions for personal devices. Protocols remain unclear regarding the fact that students may freely access social media and other apps whilst at school through personal data packages on their PMD.

When British Columbia introduced PMD restrictions in schools, this action was taken in concert with increasing digital literacy training for students, launching services to remove images from the Internet and pursue predators, and introducing legislation to hold social media companies accountable for harms. Support tools include the ERASE (Expect Respect and a Safe Education) program, a student Reporting tool, and the Take Back Your Images platform. Several school boards in Ontario have launched litigation against social media companies for disrupting student learning. The New Brunswick Child and Youth Advocate has commended BC’s approach to connecting PMD bans with educational campaigns preventing cyberbullying and raising awareness about the linkages between social media and mental health; and issued recommendations to government to block social media sites on school networks, to evolve curricula to cover topics such as evaluating online misinformation, and to consider joining litigation against social media companies. PMD restrictions in Alberta and Quebec have been criticized for being punitive in nature without committing governments to investing in digital literacy and digital citizenship education.

PEI Historical Context

A decade ago, the Women’s Network of PEI published *Taking Stock of Cyberbullying: A Scan of the PEI Context*.¹ The digital landscape has changed significantly in 10 years. Yet, many of the points and priorities cited by this document remain relevant and may inform policy and procedural approaches to PMDs in schools. Specifically, this document notes:

- The fallacy of the belief that limiting access to devices will solve the problem of cyberbullying;
- Evidence that education and prevention strategies are more effective than punitive responses;
- Opportunities within the public school curriculum to address cyberbullying, cyber-safety, digital citizenship, healthy relationships, mental health, and conflict resolution;
- The value of teaching expectations in developmentally appropriate ways;
- The lack of consistency between and among schools in responding to incidents of bullying and cyberbullying; and
- The desire of children and youth to be engaged in finding solutions

Since this time, the 2023 cyberbullying-related death of a PEI student has led to the declaration of a provincial Cyberbullying Awareness Day.² The OCYA is also aware of the current project to develop a Provincial Youth Cyberviolence Prevention Strategy, led by the Department of Justice and Public Safety.³ This strategy provides the opportunity for government departments to collaborate on the development and implementation of education programs and youth awareness on cyberbullying and other forms of cyberviolence impacting children and youth, thus supporting Island children and youth to become responsible and safe digital citizens. In light of this history, the omissions of engagement with children and youth; child-and-youth friendly versions of policy documents; and linkages to digital literacy, citizenship and safety education for cyberbullying prevention are missed opportunities in both the Directive and Operational Policy that concern the OCYA.

Responsible Use of Communication and Information Technology (CIT) Agreements

In September 2024, the changes to PMD use policy required that schools forward the Responsible Use of CIT Agreement and Expectations for Student to all students and their parents/guardians. The OCYA understands that the CIT Responsible Use Agreement is typically provided to students and parents/guardians when the student enters kindergarten or is first registered in a PEI public school, and when the student enters Grade 4, 7 and 10 (effectively, when a student would be expected to transition to a new school). This agreement outlines acceptable uses of technology and the consequences for misuse, including the provision for police involvement and legal action. This agreement must be signed by parents/guardians, and by students registered in Grades 4 and above. Here, the OCYA questions the extent

¹ Women’s Network of PEI (2014). *Taking Stock of Cyberbullying: A Scan of the PEI Context*.

https://www.princeedwardisland.ca/sites/default/files/publications/taking_stock_of_cyberbullying.pdf

² Police, advocates hope P.E.I.’s Cyberbullying Awareness Day brings discussion, support (March 22, 2024). CBC PEI <https://www.cbc.ca/news/canada/prince-edward-island/pei-cyberbullying-sex-tortion-prevention-tips-1.7152505>

³ 1st Cyberbullying Awareness Day on P.E.I. honours youth who died by suicide (April 25, 2024). CBC PEI <https://www.cbc.ca/news/canada/prince-edward-island/pei-cyberbullying-awareness-day-1.7185012>

to which these signed agreements are voluntary and informed, or even provide an opportunity for further consultation. Why couldn't parents and students simply sign an Acknowledgement (without a formal Agreement) of receipt and understanding of the Minister's Directive and attachments, particularly where serious sanctions are listed for non-compliance, including "the start [of] legal action", and "release of information to the police or other investigators" (Responsibility Use Agreement). Additionally, the Responsible Use Agreement is not presented in child-and youth-friendly language, and feedback from the Child and Youth Advisory Committee suggests that students would benefit from receiving information about regulations, expectations and consequences in accessible and understandable formats and language, especially where they are required to sign agreements that bind them to a set of standards.

Public Schools Branch Operational Procedure on Personally-Owned Mobile Devices in Schools (Consultation Working Draft)

The Operational Procedure on Personally-Owned Mobile Devices in Schools is the PSB's response to making the Ministerial Directive operational in Island schools. The OCYA response will focus on the Draft Operational Procedure, with reference to the Directive where appropriate.

Aims and Objectives

Unlike the Ministerial Directive, the PSB's draft Operational Procedure has a clearly defined purpose: to provide a focused and distraction-free learning environment (clause 1.1). Clause 1.2 continues to articulate the goal to create "a productive and safe learning environment for all," but the Procedure does not, as will be discussed, provide substantive guidance on safeguarding student privacy or protecting students from bullying and cyberbullying in contributing to this "safe" environment.

Rights and Responsibilities

The draft Operational Procedure includes a section setting out student responsibilities (clause 3.3). Students also have rights, established under the UNCRC, however these are not referenced anywhere in the PSB draft document. Inclusion of children's rights in policy documents safeguards and promotes rights-based practice, elevating the recognition of children and youth as rights-holders. Just as "the digital environment was not originally designed for children, yet it plays a significant role in children's lives"⁴, the UNCRC was authored the same year as the invention of the world wide web, meaning that its creators had no concept of the effects that technology would have on children.⁵ General comment No. 25 (2021) on children's rights in relation to the digital environment provides guidance on how parties to the UNCRC should implement children's rights in relation to digital spaces. General comment No.25 articulates children's rights to access information (UNCRC Article 17), to freely express themselves (Articles 13 and 14), to connect with others and form groups (Article 15), and to play and access recreation (Article 31) in the digital world. Holding the best interests of the child as a primary consideration in decision-making

⁴ Committee on the Rights of the Child (2 March 2021). *Convention on the Rights of the Child General comment No. 25 (2021) on children's rights in the digital environment*. <https://www.unicef.org/bulgaria/en/media/10596/file>

⁵ 5 Rights Foundation. *In our own words – children's rights in the digital world*. https://5rightsfoundation.com/wp-content/uploads/2024/09/In_Our_Own_Words_Young_Peoples_Version_Online.pdf

(Article 3) and reinforcing that children’s voices should be heard and given due weight in decision making that affects their lives (Article 12), General Comment No.25 also highlights the need to safeguard children in the digital environment. Specifically, this entails developing appropriate guidelines for the protection of children from information and material that are injurious to their wellbeing (UNCRC Article 17(e), protecting children from harm, violence, sexual and other exploitation (Articles 19, 34 and 36), and safeguarding children’s privacy (Article 16).

Participation Rights – The right to be heard and to participate in decision making

The expectations and rules, as well as the consequences for breaking the rules, are currently presented in long policy documents and shared verbally with students. In line with the previous OCYA Recommendation to the DEEY and Education Authorities to create and implement a student-centred model for education, these expectations, rules and consequences for violations should be clearly communicated in writing, using child-and-youth friendly terms and formats. On this topic, the public feedback process on the Operational Procedure provided by the PSB is not child-and-youth friendly. In line with Article 12 of the UNCRC, children and youth’s voices should be heard and given due weight in decision-making that affects them; as such, there should be a student-centred feedback mechanism as part of the public consultation process. The involvement of children and youth in the development of legislation and policy is also consistent with the UNCRC General Comment No.25 (2021) on children’s rights in relation to the digital environment. Children and youth are more likely to engage positively with school policy when they have participated in the development and implementation of new rules and processes.

Protection Rights: The right to safety and protection from harm

Bullying and cyberbullying are referenced in the Ministerial Directive but are not explicitly addressed in the PSB’s Operational Procedure. No reference to connecting to the school network, accessing filtering software, or limiting access to social media is referenced in the Procedure. The OCYA is concerned with the lack of clarity regarding monitoring and enforcement in both the Directive and the Procedure regarding the use of PMD during unstructured times (breaks, lunch, on the bus) and in unsupervised spaces (bathrooms, change rooms, cafeterias). Specifically, the Directive states that “while at school, students must not take or send videos or pictures of students, school staff or visitors (without permission from a supervising teacher for educational purposes)” (clause 25) and “students must not use a PMD or any CIT in areas where there is an increased expectation of privacy, such as change rooms and washrooms” (clause 26). The Procedure elaborates in clause 8.2, “while at school or on a school bus, students must not take or send videos or pictures of students, school staff, or visitors with their PMD visitors (without permission from a supervising teacher for educational purposes)” and in clause 8.3 specifies that PMDs must not be used in washrooms or change rooms. The Child and Youth Advisory Committee noted, “please ensure they aren’t using phones in washrooms. It happens all the time. It makes me uncomfortable”. In Newfoundland and Labrador, concerns about videos being taken of students eating or using the washroom and being shared online to bully them are cited as motivating factors to implement PMD bans in schools.⁶ Combined with educators’ and administrators’ concerns that increased monitoring and enforcement

⁶ N.L. government mulling cellphone ban in middle school, high school classrooms (August 29, 2024). CBC NL. <https://www.cbc.ca/news/canada/newfoundland-labrador/cell-phone-regulations-1.7307372>

responsibilities will overburden school staff, concerns regarding the ability of bus drivers to safely drive when tasked with supervision and disciplinary roles,⁷ the lack of general staff supervision at breaks and lunch hour, as well as in washrooms and change rooms, and the documented fact that most bullying happens during unstructured times and in unsupervised spaces⁸, the OCYA is concerned about the safeguarding of children’s and youth’s rights without further attention to monitoring PMD use outside of the classroom. Of specific concern in this regard are the protection of children’s privacy (UNCRC Article 16), protecting children from exploitation and all forms of violence (UNCRC Articles 19, 34 and 36), and the rights of children with disabilities, who may need increased access to technology to ensure participation (UNCRC Article 23) but who may be especially vulnerable to digital exploitation (UNCRC General Comment No. 25). In this regard, the OCYA has respectfully noted that the October 17, 2024 Standing Committee on Education and Economic Growth’s discussion of school PMD policies highlighted the positive aspects of the Child and Youth Advisory Committee’s feedback, but did not engage in a fulsome discussion regarding their concerns for student safety and privacy.

The DEEY suggests that the enforcement of appropriate PMD use during unstructured school time is complaints-based. However, the OCYA is concerned about underreporting of incidents and the mental health toll on children and youth fearing retaliation or further marginalization for speaking up. The PSB’s Report It! student incident reporting tool should be referenced explicitly in the Procedure as a method for students to report concerns and incidents perceived to challenge their safety and well-being. Use of the Report It! tool should be widely explained in child-and-youth friendly terms and linked to prominently and consistently on the PSB and all school websites. The online incident reporting form should be made available to students year-round, to reflect the pervasive nature of cyberbullying and reflect the Ministerial Directive’s caution that technology use beyond school premises may have a direct negative impact on the school community. It is imperative that student concerns submitted using this tool be followed up on in a meaningful, time sensitive, and student-centred way; this commitment should be entrenched within PMD policies and procedures. This is consistent with UNCRC General Comment 25 on children’s rights in relation to the digital environment, which holds that “complaint and reporting mechanisms should be free of charge, safe, confidential, responsive, child-friendly and available in accessible formats”. Separate from incident reporting, the OCYA has previously recommended that the DEEY and Education Authorities create child-and-youth friendly, discreet and easily accessible mechanisms to file complaints about processes and the delivery of services, allowing children and youth the ability to file complaints on their own behalf.

Provision Rights: The right to resources that support healthy development

The OCYA appreciates the feedback of the members of its Child and Youth Advisory Committee on the questions of student safety and privacy, as well as on other matters. For example, while some members of the Child and Youth Advisory Committee wanted more consistency in the application of rules, the majority of child and youth members appreciated the flexibility that the Directive and Policy give teachers in creating rules that reflect the needs of individual classrooms. The members of the Child and Youth

⁷ PEI Home and School Federation Resolution 2022-1 <https://peihsf.ca/resolution/school-bus-monitors/>

⁸ Francis, J. et al. (2022). School Built Environments and Bullying Behaviour: A Conceptual Model Based on Qualitative Interviews. *International Journal of Environmental Research and Public Health* 19(23). Doi: 10.3390/ijerph192315955

Advisory Committee noted that this is an important component of mutual trust-building between students and teachers. The OCYA also concurs with the Child and Youth Advisory Committee's recommendation that clauses 4.2 and 6.1 of the PSB's draft Procedure should be amended to include translation as a separate category to recognize the unique needs of English as an Additional Language (EAL) and French as an Additional language (FAL) students.

It is helpful that additional exceptions to classroom PMD restrictions will be considered for educational, medical and health, and learning support needs (clause 6.1). However, it is unclear if students can advocate on their own behalf for an exemption, or if the request must be forwarded by a parent/guardian. The Public Schools Branch's web page on the Mobile Device Procedure Consultation indicates in the Frequently Asked Questions (FAQ) section that "exceptions may be made for students with documented medical needs or other special circumstances", raising questions about the types of documentation that students and/or their guardians may be required to provide in support of an exemption request. Concerningly, the FAQ page also refers students wishing to contact home due to anxiety to the school's administration office to make a phone call, or to school staff and guidance counselors as a remedy. The OCYA recognizes the widespread use of PMDs in many students' care and safety plans, and advocates for a child-and-youth friendly, empathetic and proactive approach to considering PMD exemptions to safeguard student privacy, mental health and wellbeing. Should an exemption request be denied, it appears that only a parent or guardian would have the right to appeal that decision, and not the student themselves. Furthermore, the Directive and Policy reference consequences for non-compliance, up to and including student suspension. The OCYA maintains that students should also have the right to appeal suspension decisions independent of their parent or guardian.

Final Reflections

PEI is not alone in implementing restrictions on personal mobile devices in schools: in September 2024, new policies limiting PMD usage either entirely or during instructional time have also taken effect in British Columbia, Alberta, Saskatchewan, Manitoba, Ontario, New Brunswick and Nova Scotia. Such regulations have been in place in Quebec since December 2023; Newfoundland and Labrador are in the process of considering implementing similar restrictions, and restrictions are imposed on a school-by-school basis in the three Territories. The OCYA's jurisdictional scan reveals that many of the other provinces rolling out new PMD policies are asking similar questions about placing additional enforcement and monitoring demands on teachers, defining legitimate "educational purposes" for allowing the use of personal mobile devices during instructional time, the logistics of rolling out flexible policies in a consistent way across classrooms and schools, and the assignment of responsibility for the safety of confiscated mobile devices.

The OCYA is encouraged by the positive feedback from its Child and Youth Advisory Committee that distractions and disruptions from PMD use in classrooms have, so far, been reduced. This supports children's rights to learn and have access to a quality education (UNCRC articles 28 and 29). The mutual trust and relationship building between teachers and students that is fostered by flexible policies for PMD storage and discretionary use during instructional time is also positive, empowering children and youth to make appropriate choices as they learn to be respectful and responsible digital citizens.

The OCYA remains concerned about the monitoring of PMD use, and specifically protecting the privacy of children and youth and safeguarding them against the harms of (cyber)bullying, during unstructured time and in unmonitored places at school. Students must have access to clear and effective incident reporting processes. Additionally, the OCYA reiterates its previous recommendations to the DEEY and the Education Authorities to establish an independent right of complaint and appeal for students. This is particularly important as the OCYA asks for more clarity on the ability to request health and medical exemptions for PMD use, the documentation required to support such a request, and the process to appeal a denied exemption or consequential suspension.

Finally, the OCYA stresses that as the DEEY and Education Authorities continue to collect feedback throughout the year to evaluate and amend the Directive and Operational Policy, it is imperative that children and youth be offered accessible pathways to provide their own feedback and that their voices be considered in strengthening policies and regulations that affect them on a daily basis.

Respectfully submitted this 7th day of November 2024 on behalf of the PEI Office of the Child and Youth Advocate by:



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