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Pediatric Chairs of Canada
Directeurs de pédiatrie du Canada

Joint Submission: Input on Canada's AI Strategy

October 2025

Children's Healthcare Canada (CHC) and the Pediatric Chairs of Canada (PCC) represent the nation's leading pediatric hospitals, academic departments, and research institutes. Together, we see how artificial intelligence (AI) is already reshaping healthcare—and how Canada risks falling behind in responsible implementation.

Our members are eager to adopt tools that improve care and efficiency but are constrained by fragmented infrastructure, uneven regulation, and eroding public trust. Canada leads the world in AI research yet lags far behind in adoption. Each province, hospital, and health authority now follows a different path for evaluating and procuring AI tools, repeating costs and risks.

As Children's Healthcare Canada's 2024 report, *Beyond Band-aids*, observed, "Canada's patchwork approach to tackling the complex health and social needs of children, youth and families is failing kids, their healthcare providers, and quite frankly, the future of our country." The same fragmentation threatens responsible AI adoption.

We believe health—and especially children's health—must be the proving ground for Canada's AI strategy. Below are three key recommendations to guide federal action.

Recommendation 1: Put Health and Child Health at the Centre of Canada's AI Strategy

Focus federal investment where AI can deliver the greatest social and economic return—strengthening healthcare while improving outcomes for children and families.

Beyond Band-aids concludes that "Canada disproportionately and systemically underinvests in child and youth health and wellbeing compared to other countries." This underinvestment has predictable, measurable, and staggering costs. AI-enabled health innovation is an opportunity to correct that imbalance by targeting investments that directly improve access, timeliness, and quality of care for children.

The economic case is unequivocal. *Thrive: The Economic Case for Investing in Children's Health* (Deloitte, 2025) found that every \$1 invested in children's health yields up to \$5 in future returns. These gains arise not only from reduced hospitalizations and complications, but also from increased caregiver productivity, improved educational attainment, and higher lifetime earnings for children whose health conditions are managed early.



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AI accelerates these benefits. Predictive analytics, diagnostic support, and operational tools can identify risk earlier, target resources more efficiently, and extend reach to underserved communities. Simply put, the earlier the intervention, the higher the return—and the most effective place to begin to optimize investment and return is in children's health.

Investing in AI for health is not only good health policy—it is good economic policy. It strengthens a sector that employs one in ten Canadians and accounts for nearly 12 percent of GDP. As *Beyond Band-aids* reminds us, “Better is possible. Canada is a wealthy country with all the resources necessary to improve children's health outcomes.”

Recommendation 2: Build Trust through Rights and Safety-by-Design Regulation

Embed child rights, transparency, and safety requirements—including mandatory Child Rights Impact Assessments (CRIAs)—into AI governance frameworks.

Our members' top concerns are data privacy, transparency, accountability, over-reliance on automation, and bias. To address these, Canada should embed child-rights and safety-by-design principles into all AI governance.

Children are not small adults; they require systems that are purpose-built for kids, with measurable outcomes that reflect their developmental needs (*Beyond Band-aids*, 2023). The federal framework should therefore:

- Require Child Rights Impact Assessments (CRIAs) for any AI system used in healthcare or education.
- Ensure transparency and human-in-the-loop oversight so clinicians and families can understand and override AI outputs.
- Mandate independent evaluation for safety, bias, and developmental appropriateness before scaling.

These measures align with the UN Convention on the Rights of the Child, UNICEF's AI for Children Policy Guidance, and General Comment No. 25, making Canada's approach globally distinctive—technologically advanced and ethically grounded.



Recommendation 3: Invest in Digital Literacy and Workforce Capacity

Launch a national health AI and digital literacy strategy for providers, policymakers, youth, and families to support confident, informed use of AI technologies.

Technology adoption cannot outpace people's ability to use it safely. Canada needs a national health AI and digital-literacy strategy that equips providers, policymakers, and the public—including youth and families—with the skills to understand and evaluate AI tools.

*Beyond Bandaid*s emphasizes that “the highly specialized health workforce that cares for children and youth must be an intentional focus of national health workforce planning initiatives.” Building digital and AI fluency must therefore be treated as a core workforce competency, integrated into professional education and ongoing training.

Training should be:

- Integrated into existing health-profession curricula and continuing education.
- Accredited and practice-based, not one-off courses.
- Inclusive, ensuring equitable access across regions and demographics.

Building trust begins with literacy. Informed users are more confident adopters.

Conclusion

AI offers a once-in-a-generation opportunity to strengthen Canadian healthcare—especially for children and youth, where the return on investment will accrue for generations to come—while fueling long-term economic growth.

By focusing federal investment where Canadians care most, and by embedding ethics, evidence, and equity at every stage, Canada can lead the world in responsible AI. Investing in children's health yields among the highest social and economic returns of any public investment. Every dollar spent now delivers measurable value for families, communities, and the national economy.

Every day matters in the life of a child. If Canada puts health and child health at the centre of its AI strategy, we will build a healthcare system that is safer, smarter, and more sustainable—and an economy that thrives on innovation people can trust. This is not just good health policy; it is good economic policy.



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About Us

Children's Healthcare Canada is a national association serving healthcare delivery organizations that care for children and youth and advocates to accelerate excellence and innovation in health systems serving kids and their families across the continuum of care. Our members deliver health services to millions of children and youth across Canada each year, and include all 16 children's hospitals, community hospitals, rehabilitation hospitals, home and respite care agencies, children's treatment centres, and regional health authorities.

The Pediatric Chairs of Canada represents the department heads of Pediatrics within Canada's 17 medical schools. PCC provides national leadership to strengthen the future of pediatrics, advancing education, workforce planning, and research in support of excellent care for children and youth.