

Joint Statement on the Release of the National Action Plan to End Gender-Based Violence



As advocates who developed a [Roadmap for the National Action Plan on Gender-Based Violence](#),¹ we have been anxiously waiting for the release of this 10-year plan. This statement is our joint reaction to the federal government's release on November 9, 2022, of its long-awaited [National Action Plan to End Gender-Based Violence](#), which comes nearly two years after the 2021 [Joint Declaration for a Canada Free of GBV](#). We are happy to see that all provinces² and territories are committed to realizing the vision of the National Action Plan (NAP).

We are heartened to see the document's intersectional approach and its highlighting of some key recommendations in alignment with our own, including: the need for continued engagement with advocates; national research and data; funding of core services; addressing poverty, homelessness, and housing; access to communication technology and transportation especially in rural, remote, and Northern areas; and income supports and basic needs infrastructure. Further, the document recognizes the need for mental health and addictions supports, services for children and perpetrators, and expanding alternatives to the criminal justice system.

However, the document released two weeks ago is not a National Action Plan.

Rather, it is a framework that will guide further negotiations and bilateral agreements with each province and territory. More specifically, the Framework puts forth a selection of broad suggestions for actions, which will enable provinces and territories to pick and choose, and shape their commitments around their own priorities. A NAP, as presented in our ready roadmap – would include concise actions that each province and territory commits to rather than a menu of opportunities for action. After a two-year wait, the NAP is still far from reaching its implementation phase.

By recognizing and seeking to address many of the root causes of gender-based violence (GBV), this Framework constitutes a step in the right direction. However, we are concerned that the plan is too high-level, not far-reaching enough, and therefore insufficient to reach its stated goals and effectively address the systemic nature of GBV.

Questions remain about how the federal government intends to steer this in a way that is transparent, allows continuity across provinces and territories, addresses systemic barriers and root causes, is measurable and accountable, and does not result in massive gaps depending on

¹ At the end of 2020, the federal department of Women and Gender Equality asked and funded Women's Shelters Canada to lead the development of a strategic framework for a NAP with 40 anti-violence experts. Our full report – a [ready roadmap](#) – was delivered on April 30, 2021. With 100 recommendations across four pillars, the report answered the question *What will it take to achieve a Canada free of gender-based violence?*

² Although the province of Quebec supports the general vision, they will be implementing their own actions to address gender-based violence in their province.

a jurisdiction's political priorities. It is also unclear how the GBV sector will be involved in providing oversight on the national plan, to ensure that a person's access to services does not remain dependent on their postal code.

More specifically, we have questions and reservations around:

1. Limited national-level actions
2. Framing the suggested actions as optional
3. Key recommendations missing
4. Limited focus on systemic change
5. No mention of meaningful accountability and independent oversight
6. Lack of commitment to sustained and escalating investment

National-Level Actions

By delegating actions solely to provincial and territorial governments, the Framework does not address national-level responses to gender-based violence. This means that national organizations that ensure the coordination of, provide valuable research and expertise to, and advocate on behalf of the anti-violence sector and survivors at the national level are neither included nor provided for in this plan. Although the NAP places much emphasis on continuing engagement with the sector, it remains unclear how national-level organizations will be involved.

Institutions under federal jurisdiction are also not included in the Framework, namely the immigration system, Canadian Border Services Agency, correctional institutions, the Royal Canadian Mounted Police (RCMP), Canada Revenue Agency, Service Canada, the Department of Justice, Canadian Heritage, and the Canadian Armed Forces. While the Federal Strategy – [It's Time: Canada's Strategy to Prevent and Address Gender-Based Violence](#) – includes actions for institutions that fall under federal jurisdiction, it remains unclear how these efforts will be harmonized with the NAP and the provincial/territorial bilateral agreements. While recent revisions to the Divorce Act and some provincial/territorial family laws recognize the realities of cultural nuances, the NAP does not mention this in the family law context. There is no mention of aligning family law across jurisdictions, reviewing mandatory charging, enhancing immigration law to support people facing GBV, changing legislation that limits access to income supports, or whether Canada should consider criminalizing coercive control. Further, there is nothing in the Framework about holding state institutions accountable with regards to culture change, system redesign, or establishing oversight and accountability mechanisms.

There are areas that could particularly benefit from federal leadership in order to ensure equity amongst Canadians, such as establishing minimum standards and protections when it comes to online safety, sex education curriculum, public education campaigns, a livable income for all, and regularizing those with a precarious immigration status. Although the Framework recognizes GBV as a human rights violation, there is no mention of enshrining international legislative instruments at all levels of governments nor are there recommendations related to human rights reform.

Optional Actions for Ensuring Survivors' Access to Services

While it is encouraging to see the Framework repeatedly state that survivors must have access to services no matter where they live, we are concerned that it will fall short of this goal. By providing a selection of suggested actions and asking provinces and territories to choose their own priorities, this will likely accentuate gaps and inconsistencies already present within the patchwork of services and programs across the country.

Significant gaps exist when it comes to service provision between regions. In some areas, and especially in rural, remote, and Northern areas, there is a dearth of services for survivors to turn to. How will the federal government ensure that survivors' access to quality services does not depend on their postal code, if setting priorities is left up to each province or territory? Will the funds be distributed based on needs, or per capita? Who will be responsible for building services from the ground up in places where there are none?

Sexual assault centres, women's shelters and transition houses, and other community-based services have been asking for stable, sustainable core funding for decades. They are faced with an increasing demand for their services, long wait times, complex needs, and worker retention issues as they continue to operate on limited, unstable, and often project-based funding. When NAP actions are framed as optional, there is a risk that service needs may not be fully met.

Key Recommendations Missing

Sexual Violence

Although the Framework recognizes sexual violence as a distinct form of violence, some key recommendations by sexual violence advocates, such as EVA Canada's [community engagement report](#), have been left out. These include the need for a comprehensive intersectional analysis of the child welfare system, as well as addressing the over-policing and overcriminalization of racialized groups including sex workers. Although alternatives to justice are mentioned, transformative justice is not on the table, and neither is funding survivor advocates as systems navigators, or programming for male survivors. There is a need to facilitate and equalize access to Sexual Assault Nurse Examiner (SANE) programs across the country, and a need for third party reporting options for survivors who wish to report the sexual violence they have experienced safely and anonymously. There is also a need for financial supports and compensation for survivors. The Framework does not mention anything about state violence and institutional accountability, for example ensuring that police services and the RCMP collaborate with advocates and implement the Violence Against Women's Advocate Case Reviews (VACR), which crucially provide civilian oversight and reduce the number of sexual assault cases that are deemed "unfounded." Lastly, there is nothing in the Framework around tackling male-dominated workplace cultures and mitigating the impacts of the extractive industry on women, the land, and surrounding communities.

Housing, Income Supports, and Privatization

It is fundamental that federal, provincial, and territorial governments make changes to legislation and policy that continue to create barriers to access to income supports, to access to advancement and recourse in employment and labour market outcomes (economic justice), and that develop immigration precarity. Moreover, affordable housing remains a significant gap for people facing violence and the current Framework does not provide a concrete plan to move forward on consistent, affordable housing across Canada. We also note significant gaps in terms of needed reforms to labour laws to better prevent GBV and support survivors in the world of work, including the implementation of ILO Convention 190. Finally, we note that the Framework has not provided any guidance on the privatization of social infrastructure programs. Privatization creates increased user fees and tolls and shifts control of public facilities to unaccountable, private, for-profit corporations. It also diverts public funds from core services, needed by people, to corporate profits. Keeping infrastructure and services public is a wise investment of public funds and provides greater local control, flexibility, and efficiency in operations, lower costs, accessibility, and quality services for members of the public.

Intersectionality

Intersectionality is lacking in many sections of the Framework. For example, it does not address the specific realities facing women with disabilities, nor is there any mention of French services and the realities of linguistic minorities. While the current Framework picks up on aspects of social infrastructure, there are significant gaps that have not been addressed. It is important to note that low-income, racialized, Black, and Indigenous communities are already disproportionately impacted by the structural inequities within our social infrastructure programs, which put them at greater risk and disadvantage when facing gender-based violence. Sentencing and incarceration, which has a particular impact on women from specific communities, such as Indigenous and Black communities, and is deeply interwoven with GBV, is ignored. This reality, along with the overall impact of Canada's correctional system on racialized and non-status communities' experience, is ignored in the Framework.

Focusing on Systemic Change

Although the Framework encouragingly recognizes the intersectional nature of GBV - that certain groups are at higher risk of experiencing GBV because they experience overlapping layers of oppression - the suggested actions are not sufficiently far-reaching when it comes to addressing imbedded systemic issues.

For example, it emphasizes education and training instead of tackling systemic change by rethinking structures, decolonizing, and developing alternatives. Although the Framework identifies the overrepresentation of Black, Indigenous, and racialized children within the child welfare system as an issue, the corresponding recommended action is to provide training to workers instead of rethinking the problematic system. Similarly, issues within the criminal justice system are approached almost exclusively through recommending training. The

Framework's commitment to expanding access to free legal advice and services falls short of what is really needed: access to full legal representation for survivors of GBV. Although ongoing training is needed, training alone is far from sufficient to foster culture and systemic change. Moreover, instead of addressing low conviction rates when it comes to sexual violence, the suggested action is to increase public legal education about sexual assault laws. Although the Framework does recognize the need for alternatives to the criminal justice system, the reality on the ground is that GBV-related funding has traditionally been funneled towards criminal justice-based responses, even though only 5% of survivors of sexual assault engage with the criminal justice system. There are no guarantees that provinces and territories will not continue to direct this new funding towards justice-based responses rather than towards alternative responses or prevention. Finally, it is crucial that suggested law and policy reform related to immigration and refugees be included in the action plan.

Meaningful Accountability and Independent Oversight

As organizations deeply invested in bringing about the systemic changes required to address the root causes of GBV, meaningful accountability is imperative. As noted in our Roadmap, a robust Monitoring, Evaluation, Accountability, and Learning (MEAL) framework must be in place from the beginning to ensure that evidence is properly generated to support the NAP's ongoing success. We need to ensure that intended outcomes are being effectively measured and that, as civil society, we are able to easily access this information, including how and where funds are distributed.

Although the input from civil society into the Framework is acknowledged, there is no mention of how civil society will be involved going forward. As per our recommendations, we strongly see the need for a National Advisory Council on the National Action Plan on GBV. The creation of this Council via a transparent appointment process would guide, support, and help to implement the NAP by working in concert with the NAP Secretariat. Council members need to receive adequate compensation in order to dedicate focus and time.

Commitment to Sustained and Escalating Investment

While core funding for the GBV sector is mentioned as one of many options that provinces and territories can take, there is a lack of focus on maintaining and increasing services across the country. We know that, currently, access to GBV services is dependent on a person's postal code. The Framework does not address this; it does not include a commitment from every province and territory to increase GBV service capacity across the country, particularly in rural, remote, Northern, and Indigenous communities.

For example, we wonder whether the provinces that do not currently fund second stage shelters (longer term transitional housing for women and children fleeing violence) will now fund those services. Or, will they use these federal funds to concentrate on other priorities, therefore maintaining an unequal system across the country?

Additionally, there appears to be no new money linked to federal actions within the Framework. Therefore, we call for further investment of a minimum of \$600 million over the next four years for the development and implementation of the national and federal components of the Plan.

Lastly, if services for survivors are not adequately funded, frontline workers in the anti-violence sector, who are predominantly women and often survivors themselves, are also not adequately compensated and are at higher risk of experiencing burn out, compassion fatigue, and secondary trauma.

We recognize all the efforts that have been put into this Framework by the federal department of Women and Gender Equality Canada (WAGE), and we applaud its intention to prevent violence, address root causes, provide supports to survivors, fill persistent gaps, and engage all people in Canada. It remains to be seen what actions provinces and territories will choose to implement, and whether the Framework will materialize with consistency across jurisdictions.

While we do not doubt that this Framework will make considerable headway for survivors, we must also ensure that systemic issues are tackled at a systemic level, with national-level actions and leadership. We are hopeful that with continued engagement and oversight from advocates, civil society and government can bring about the sustainable systemic changes needed in the long-term to prevent and end gender-based violence.

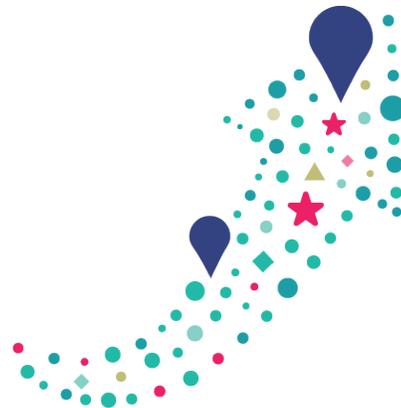
We look forward to continuing to work with the federal, provincial, and territorial governments to further develop the Framework into a fully-fledged National Action Plan.

The roadmap group thanks Ending Violence Association of Canada for taking the lead on drafting this statement.

Signed,

Collaborators on the Roadmap report:

Action ontarienne contre la violence faite aux femmes
Awo Taan Healing Lodge Society
Barbra Schlifer Commemorative Clinic
BWSS – Battered Women’s Support Services
Canadian Association of Elizabeth Fry Societies
Canadian Centre for Housing Rights
Canadian Centre for Policy Alternatives
Canadian Labour Congress
Canadian Women’s Foundation
Ending Violence Association of Canada
Girls Action Foundation



Institute for Research and Development on Inclusion and Society
Luke's Place
Ontario Coalition of Rape Crisis Centres
PREVNet
Prince George Sexual Assault Centre
Provincial Association of Transition Houses and Services of Saskatchewan
Québec contre les violences sexuelles
Rise Women's Legal Centre
South Asian Legal Clinic of Ontario
West Coast LEAF
Women's Shelters Canada
Yukon Status of Women Council