Intersectional Promises: How Well Did the Canadian National Action Plan to End Gender-Based Violence Integrate an Intersectional Approach?

by Olesya Kochkina

Abstract: It took more than ten years of feminist advocacy for the Canadian government to adopt the National Action Plan (NAP) to End Gender-Based Violence (GBV) on November 9, 2022. This study is among the first to trace the development of and critique the NAP. Specifically, I interrogate how well is the NAP grounded in an intersectional approach. Using the adjusted Intersectionality-Based Policy Analysis (IBPA) and qualitative content analysis as research methods, I argue that the recently adopted NAP is premised on a deflated definition of intersectionality and lacks attention to the role of existing policies in reproducing social inequalities. The NAP fails to centre the voices of those most affected and to demonstrate an in-depth understanding of systemic causes and effects of GBV resulting in different intersectional needs of various at-risk groups. As a consequence, the NAP provides symbolically intersectional solutions that are unlikely to be effective in addressing GBV. In addition, the NAP relies on non-intersectional data for progress assessment, and it is without built-in mechanisms for meaningful engagement of the most affected groups. With such a design, the current NAP will not be able to achieve the stated vision of a Canada free from GBV.

Keywords: content analysis; gender-based violence; IBPA; intersectionality; policy analysis

Résumé : Ce n'est qu'après plus de dix ans de défense des droits des femmes que le gouvernement canadien adopte, le 9 novembre 2022, le Plan d'action national (PAN) pour mettre fin à la violence fondée sur le sexe (VFS). Cette étude est l'une des premières à retracer l'évolution du PAN et à en faire une critique. Plus précisément, j'examine dans quelle mesure le PAN repose sur une approche intersectionnelle. En utilisant la version adaptée de l'analyse des politiques fondée sur l'intersectionnalité (IBPA) ainsi qu'une analyse qualitative de contenu, je soutiens que le PAN récemment adopté repose sur une définition édulcorée de l'intersectionnalité et néglige le rôle des politiques existantes dans la reproduction des inégalités sociales. Le PAN ne fait pas entendre la voix des personnes les plus touchées et ne démontre pas une compréhension approfondie des causes et des effets systémiques de la VFS, qui se traduisent par des besoins intersectionnels différents selon les groupes à risque. Par conséquent, le PAN propose des solutions symboliquement intersectionnelles qui ne seront probablement pas efficaces pour lutter contre la VFS. De plus, le PAN s'appuie sur des données non intersectionnelles pour évaluer les progrès réalisés, et il ne comporte pas de mécanismes intégrés permettant une participation significative des groupes les plus touchés. De ce fait, le PAN actuel ne sera pas en mesure de concrétiser la vision d'un Canada exempt de VFS.

Mots clés : violence fondée sur le sexe; intersectionnalité; analyse des politiques; IBPA; analyse de contenu

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Introduction

Researchers acknowledge the potential of intersectionality as a policymaking framework to deliver more equitable social outcomes (Bowleg 2008; Hankivsky and Cormier 2011). The Canadian government promised that the National Action Plan (NAP) to End Gender-Based Violence (GBV) would be "grounded in an intersectional approach" (WAGE 2022b, "The high-level framework for joint action"). This aligns with what Canadian feminist organizations have advocated for: "[W]e need the national action plan to be bold, to be robust, to be well resourced and to be intersectional" (Grant, Hayes and Renzetti 2022).

The goal of this paper is to examine how the NAP integrates intersectionality. First, I provide background on the development of the current action plan. Then, I review the literature discussing what it means for a public policy to be intersectionality-informed. Next, I present the findings of qualitative content analysis of the NAP informed by Hankivsky's Intersectionality Based Policy Analysis (IBPA). I aim to contribute to intersectional critique that applies intersectionality "to examine a text, a discourse or policy in order to determine whether they are intersectional" (Garcia and Zajicek 2022) with an ultimate goal to move discourses and policies towards greater social justice. Scholars advocate for the use of an intersectional approach in policymaking because it has the potential to bring a "paradigm shift that foregrounds the complex contexts and root causes of health and social problems" (Hankivsky 2012, 8). An intersectionality-based policy framework brings forward the vantage point of groups that may otherwise remain invisible (Cole and Duncan 2023; Crenshaw 1989), thus producing more equitable and inclusive policy outcomes. This is particularly important in addressing GBV since, as scholars pointed out, the analytical frameworks that focus on single issues, such as race, class, or gender, fail to address the problems produced by a complex web of oppressive powers (Crenshaw 1991; Day and Gill 2020). The assumption that experiences with GBV are the same for all women leads to "one size fits all" solutions that are generally ineffective for everyone. Developing an approach to safety tailored to the intersectional needs of various groups "offers genuine empowerment to end *all* forms of oppression and violence against *all* survivors" (Day and Gill 2020, 847). It may be argued that the practical application of intersectionality is challenging (McCall 2005) and its use within policies tends to be "blurry" (Manning and Levac 2022). However, a wide range of tools guiding the implementation of intersectionality within policies are currently available (Hankivsky and Jordan-Zachery 2019), thus policymakers have resources to address these challenges.

My analysis of the NAP reveals a weak and inconsistent application of intersectionality which is likely to produce results opposite to that which intersectionality intends. Sara Ahmed called this phenomenon "*non-performativity*: when something is named without coming into effect" (Ahmed 2018, 333, emphasis in the original). The NAP's recommendations demonstrate the non-performative use of intersectionality; its surface adoption of the language of intersectionality masks the lack of commitment to disrupting the existing power status quo disadvantaging certain groups in the context of GBV. Furthermore, by failing to centre the standpoints of marginalized groups, the policy contributes to reproducing their vulnerable position. The design of the NAP works to sustain rather than challenge the existing hierarchies in the context of GBV.

Background: Decades of Feminist Advocacy Resulted in Adopting the NAP

On November 9, 2022, the Government of Canada released a ten-year National Action Plan (NAP) to End GBV. The introduction of the NAP was a culmination of more than ten years of strategic advocacy by Canadian feminist organizations. NAP signifies a critical step in addressing "one of the most pervasive, deadly and deeply rooted human rights violations" (WAGE, 2022b Introduction). Yet the advocates for the NAP were far from celebratory (see Joint Statement on the Release of the National Action Plan to End Gender-Based Violence 2022).

The Canadian campaign to advocate for the NAP addressing GBV started around 2012 as a response to the series of United Nations resolutions and a global UN campaign calling on states to adopt multi-sectoral action plans to address Violence Against Women (VAW) by 2015. Women's Shelters Canada (WSC) spearheaded a national advocacy campaign, involving more than 250 organizations (Dale, Maki and Nitia 2021, 362). The goal was to push the Cana-

dian government to enact a plan that is "bold, ambitious, and intersectional" (Dale, Maki and Nitia 2021, 135).

The Justin Trudeau Liberal government, elected in 2015, was generally supportive of developing a comprehensive policy on VAW and GBV; however, instead of introducing a long-term NAP, it adopted a five-year Strategy titled "It's Time: Canada's Strategy to Prevent and Address Gender-Based Violence" in 2017. Although the Strategy contained important initiatives and increased funding towards GBV, it was criticized for a scattered approach and limited coherence of actions (Gotell 2023).

The 2021 federal budget provided $600 million over five years to advance the NAP; the next year another $540 million over five years was added to work with provinces and territories on the NAP. Another milestone was the endorsement of the Joint Declaration for a Canada Free of Gender-Based Violence by the Federal-Provincial-Territorial Ministers Responsible for the Status of Women in January 2021. This Declaration states that the NAP is a high-level framework for joint action; it identifies the vision, goals, pillars, guiding principles, and foundation for the NAP. However, the Declaration left the question of coordination mechanisms open.

One of the initiatives funded under the 2021 budgetary allocation was the development of the report titled "Roadmap for the National Action Plan on Violence Against Women and Gender-Based Violence" (hereafter "Roadmap"). The report was sanctioned by Women and Gender Equality Canada (WAGE) and developed by anti-violence experts from advocacy groups, front-line service organizations, academia, and professional organizations (Dale, Maki and Nitia 2021). These experts developed a prototype of a NAP with recommendations structured around five pillars: (1) enabling environment and social infrastructure; (2) prevention; (3) promotion of responsive legal and justice system; (4) support for survivors and their families; and (5) Indigenous Women's leadership (assigned to a different group, WAGE Indigenous Women's Circle). The Roadmap put forward over one hundred recommendations offering transformative solutions to systemic problems. In addition, the Roadmap had calls to action covering police and state violence, complexities of transformative justice, wrap-around services, and stability of VAW/GBV sector. Arguably, the Roadmap was a comprehensive and well-researched document developed through a transparent participatory process that could be translated into a national framework for action, provided there was political will.

The launch of the NAP in November 2022 could be viewed as a victory for feminist advocacy. However, the experts who developed the Roadmap expressed serious concerns. "The document released two weeks ago is not a National Action Plan," they said in a Joint Statement on the Release of the NAP (Joint Statement 2023). Acknowledging that the NAP is aligned with many of Roadmap's traits, the authors critique the NAP for not being binding on Canadian governments and for providing recommendations that are too broad, not far-reaching, and without identified priorities.

All provinces and territories signed bilateral agreements with the federal government between June and November 2023. These agreements cover four fiscal years from April 1, 2023, to March 31, 2027. One of the advocates' key demands – as well as one of the main promises of the policy document – is that the NAP integrates an intersectional perspective. How effectively does the NAP use intersectionality? To answer this question, I will first outline the characteristics of an intersectionality-informed policy.

Literature Review: Intersectional Policy Framework

Defining Intersectionality in a Policy Context

Intersectionality's "methodological pluralism" (Hankivsky and Jordan-Zachery 2019, 10) means there are multiple ways that intersectionality is defined and applied in policymaking. The very definition of intersectionality used within a particular policy sends a message about that policy's focus. Scholars point out that some definitions of intersectionality extend towards social justice, while others have limited transformative potency (Collins 2015; Christoffersen 2022; Walby, Armstrong and Strid 2012). The literature strongly cautions against the "additive" approach to intersec-

tionality; socially constructed categories of gender, race, sexuality, and (dis)ability must be recognized as co-constitutive and indivisible (Bowleg 2008). In addition, scholars underline that a productive way to engage with intersectionality is by paying attention to the ways that different regimes of inequality shape each other (Walby, Armstrong, and Strid 2012). It is important to focus the definition of intersectionality on the systems of domination that place individuals in a multi-dimensional hierarchical position rather than on identities alone.

For example, compare the following definitions:

> The concept of "intersectionality" refers to the interactivity of social identity structures such as race, class, and gender in fostering life experiences, especially experiences of privilege and oppression. (Gopaldas 2013)

> Intersectionality investigates how intersecting power relations influence social relations across diverse societies as well as individual experiences in everyday life. As an analytic tool, intersectionality views the categories of race, class, gender, sexuality, nation, ability, ethnicity, and age—among others—as interrelated and mutually shaping one another. Intersectionality is a way of understanding and explaining complexity in the world, in people, and in human experiences. (Collins and Bilge 2020, 2)

Unlike the first definition, the second one highlights the relationships between different social levels emphasizing the primary role of power in creating inequalities. Formulated this way, the definition invites us to think about the role of policies in shaping lived experiences, social relationships, and overarching power relations. As much as intersectionality's "definitional fluidity" (Collins 2015) allows policymakers to adjust the conceptual framework for a particular initiative, it is important to ground it in a definition that guides towards transformative solutions.

What Makes a Policy Intersectionality-Based?

The application of intersectionality to public policy can be traced to 2006, with the publication of Tiffany Manuel's paper, which first talked about the advantages of using an intersectional lens in public policies (Garcia and Zajicek 2022, 273). Since then, authors have explored the core elements of an intersectionality-informed policy. Attention to power is arguably at the heart of an intersectional approach (Cho, Crenshaw and McCall 2013; Collins and Bilge 2020; Hankivsky 2012). Power structures intersect at multiple levels (Hankivsky 2012) placing people in unique social locations, thus the same policy will be experienced differently by different groups (Collins and Bilge 2000, 6). A core intersectionality tenet is bringing the lived experiences of people from marginalised communities to the centre of policy analysis and formulation (Bowleg 2012, 1268). Methodological misuse of intersectionality can lead to the recentring of hegemonic subject positions, such as whiteness (Tate 2023). Recentering whiteness and other dominating groups along with the othering of non-white and other disadvantaged communities often happens through the application of a so-called "colourblind intersectionality" (Carbado and Harris 2019, 2223), which is defined as a false assumption of neutrality of certain subject positions. This leads to treating white, able-bodied, cis-gender and other privileged groups as the default baseline. Scholars underline the importance of examining the realities of historically marginalized populations from their unique vantage point and not through comparison with an imagined "norm" (Bowleg 2012; Carbado and Harris 2019).

Meaningful engagement with the intended beneficiaries helps to address the risk of falling into the trap of "colourblind" intersectionality. For example, Samantha LaMartine, Nakamura, and García (2023) examined the experiences of victimization from the vantage point of Afro-American transgender women, highlighting that their aggravated vulnerability to GBV comes from the intersection of racism, classism, cissexism, and sexual stigmatization (105). The interaction of these powers positions Black transgender women at a higher risk for intimate partner violence, sexual assaults, police violence, re-victimization, and criminalization; at the same time, the authors underline the resilience of the community and their creativity in developing coping mechanisms (LaMartine, Nakamura, and García

2023, 106-107). The authors examine the situation from Black transgender women's vantage point to inform their recommendations for GBV-related counselling and programming.

A common critique of intersectionality is that it works to fragment advocacy movements rather than support unity and cohesion. This argument is often taken up by policymakers who reason that it is not feasible to introduce a different policy for each "interest group"; intersectionality-based policy is "too complicated" (Manning and Levac 2022). However, Dorothy Roberts and Sujatha Jesudason demonstrated that intersectionality can forge political alliances between such different groups as reproductive justice activists, racial justice activists, women's rights, and disability rights activists. They suggest that even though these groups operate from distinct social locations, the analysis of their commonalities "reveals ways in which structures of oppression are related" thus offering better ways to address them (Roberts and Jesudason 2013, 316). Unfortunately, rather than acknowledging variabilities and spaces of convergence, policies tend to operate from an underlying assumption of being gender-, race-, class-, sexuality- and ableism-neutral which results in an ineffective "one size fits all" approach. Scholars argue that policies and programs addressing GBV from appropriate vantage points are scarce (Henriksen et al. 2023).

Methodology

To answer the question "How does the Canadian NAP on GBV use an intersectional approach to frame the policy?" I draw on Intersectionality-Based Policy Analysis (IBPA) (Hankivsky 2012) and qualitative content analysis (QCA) (Altheide and Schneider, 2013; Krippendorff 2019). Introduced in 2012, IBPA aims "to better illuminate how policy constructs individuals' and groups' relative power and privileges vis-a-vis their socio-economic-political status, health and well-being" (Hankivsky 2012, 134). The core of IBPA consists of eight guiding principles and twelve descriptive and transformative questions. The descriptive questions help to interrogate the policy issue while transformative questions help to develop approaches to tackle it. IBPA's guiding principles imply that the work will be done collectively by people who have lived experiences with the policy issue, be rooted in reflexive processes, include multi-level analysis, and acknowledge contextualized power dynamics with the ultimate goal of achieving social justice.

For my analysis, I adopted the approach to combining IBPA and QCA used by other scholars (e.g., Di Matteo 2022). I adjusted the IBPA framework to match my research question and the availability of resources. Four slightly modified questions were used to guide my analysis of the NAP (adapted from Hankivsky 2012, 39-42):

1) How does the NAP define intersectionality? How does the NAP use intersectionality to frame the causes of GBV and its effects on various groups? How does this framing shape the understanding of the groups' needs in the context of GBV?

2) How has this representation of GBV come about within the NAP? Who was involved and what type of evidence was used?

3) How will proposed actions address intersectional inequities?

4) What intersectional factors will be measured within the evaluation of the NAP and how?

Findings: the NAP's Non-Performative Intersectionality

The NAP's guiding principles assert that the policy is "grounded in an intersectional approach" (WAGE 2022b, "The high-level framework for joint action)". The words "intersectionality" and "intersectional" are sprinkled throughout the document: they appear in each section, twenty-one times in total. However, my analysis suggests that the kind of "intersectionality" used within the NAP is a hollowed-out version, depleted of its transformational potential (Bilge 2012). The NAP is premised on a flattened definition of intersectionality that does not orient the policy toward social justice. The NAP de facto homogenizes the most affected groups despite listing them separately. The monitoring and

reporting system deployed by the NAP does not have ways to integrate intersectionality-informed methods of data collection and analysis. The NAP demonstrates "non-performativity" (Ahmed 2006; 2018) in how it addresses systemic barriers and in how it commits to engaging people with lived experiences. Ahmed (2016) suggests that non-performative speech acts "'work' precisely by not bringing about the effects that they name" (Ahmed 2016, 105). Scholars argue that this failure is not a result of a mistake or a circumstance. "The failure is the function" (Jackson 2018, 47) in the sense that non-performatives are used to replace the action. The NAP's non-performative intersectional language results in evading further intersectional analysis and response.

Diluted Definition of Intersectionality

The first set of questions that guided my content analysis was: "How does the NAP define intersectionality? How does the NAP use intersectionality to frame the causes of GBV and its effects on various groups? How does this framing shape the understanding of the groups' needs in the context of GBV?"

The Glossary provided in the Annex of the NAP contains the following definition of intersectionality:
> Approach to analyzing social relations and structures in a given society developed by Kimberlé Crenshaw. Intersectional approaches recognize that every person's identity is made up of multiple identity categories such as (but not limited to) ability, attraction, body size, citizenship, class, creed, ethnicity, gender expression, gender identity, race, religion. The ways a person may experience systemic privilege and oppression are affected by the intersection of these identity categories, depending on how they are valued by social institutions. (WAGE 2022b, "Annex C - Glossary")

This definition frames intersectionality as an individual intellectual contribution rather than an outcome of the collective political struggles of historically marginalized communities. It wrests intersectionality away from Black feminist thought and detaches Crenshaw from the cohort of anti-racist and anti-colonial intellectuals/activists. The framing of intersectionality, organized around individual identity categories, is narrow and misleading as it obscures the roles of systemic forces. The language used to describe the relationships among multiple categories—"made up of"—does not strongly caution against the additive approach and treating identity categories as mutually exclusive (Bowleg 2008). For example, Bowleg underscores that personal identities are not made up of independent characteristics, such as race, gender, and sexual orientation but constitute each other and, if taken apart, they can't fully explain unequal outcomes faced by individuals (Bowleg 2008, 2012).

There is another explanation of the intersectional approach within the NAP that gives slightly more attention to systemic factors and context:
> …an intersectional lens, which recognizes that people often experience multiple oppressions due to the combined effects of systemic discrimination (e.g., ableism, classism, colonialism, a collective history of trauma, poverty, racism, sexism, and discrimination on the basis of sexual orientation, gender identity and expression). Intersectionality takes into account historical, social, and political contexts and centres the unique experiences of the individual and/or group in relation to their identity factors. (WAGE 2022b)

However, this explanation neglects the role of existing institutions, policies, and administrative decisions in (re)producing social inequalities. The document lists the "-isms" without discussing how they work together to position specific groups as more vulnerable to GBV. As a result, the dominant underlying assumptions about GBV remain unchallenged (e.g., that GBV is an individual-level problem) and may be reproduced. Sirma Bilge pointed out that framing social life as interactions of individuals, not a collective, can "create the conditions allowing the founding conceptions of intersectionality - as an analytical lens and political tool for fostering a radical social justice agenda - to become diluted, disciplined, and disarticulated" (Bilge 2012, 407). Despite talking about systemic discrimination, the NAP is premised on a disarticulated intersectionality.

GBV affects various groups differently. An intersectional understanding of variations and similarities among the most impacted communities is crucial for formulating effective policy responses. The NAP uses the concept of intersec-

tionality to name the most affected groups, it acknowledges that GBV is rooted in gender inequality amplified by other systemic factors (WAGE 2022b, "Introduction"), but it does not substantiate this statement with an analysis of intersecting power structures that create unique experiences with GBV for each of the listed groups. This results in de-facto homogenization of the groups and their needs. For example, the document states: "Certain populations that are at risk of GBV or underserved when they experience these forms of violence include Indigenous women and girls; Black and racialized women; immigrant and refugee women; Two-Spirit, lesbian, gay, bisexual, transgender, queer, intersex and additional sexually and gender diverse (2SLGBTQI+) people; people with disabilities, and women living in Northern, rural, and remote communities" (WAGE 2022b, "Introduction").

In this and similar passages, all groups are lumped together without a discussion of how different "-isms" co-produce specific inequalities for various groups work in their specific situation. For example, immigrant and refugee women are included in the list, but nowhere in the document can we find discussion of how the intersection of precarious legal status produced by migration policies with gendered racializations makes some women more vulnerable to GBV. Moreover, "migrant and refugee women" are further homogenized as the NAP does not acknowledge diversities within and between these two groups. The policy does not take into account the ways that sub-groups even within a seemingly coherent "refugee" category are differently affected by the "welfare models and societal discourses related to migrant deservingness" (Di Matteo 2022, 70).

One of the NAP's recommendations is to "improve programs, services, and supports that impact people experiencing GBV so they may better address the intersectional needs of diverse communities and populations" (WAGE 2022b, "Pillar One"). This recommendation is non-performative as it is not linked to a robust background analysis; it also does not specify which programs, services, and supports impact which groups and in which ways. Nor does it address what needs to be changed. The recommendation is too abstract to guide an intersectional response. Without concrete and targeted actions to address intersectional realities, the NAP's solutions are likely to benefit those who are already relatively privileged and further marginalize those who are disadvantaged.

Engaging People with Lived Experiences of Intersectional Oppressions

My second set of questions was: "How has this representation of GBV come about within the NAP? Who was involved and what type of evidence was used?" Hankivsky (2012, 37) points out the critical need to engage with people who are typically excluded from policy formulation. Unfortunately, the NAP contains only a vague description of how diverse knowledges were taken into account while developing the policy.

The official Backgrounder for the NAP states that it "has been informed by over 1000 recommendations through years of engagement with Indigenous partners and a wide range of stakeholders, including victims/survivors, frontline service providers, community leaders, experts, academics and civil society" (WAGE 2022a). The text of the NAP echoes this statement (WAGE 2022b, "The need for a national action plan"). At the same time, the NAP suggests that one of the barriers to applying intersectionality is the lack of data that uses an intersectional lens. If "over 1000 recommendations" provided by "a wide range of stakeholders" did not offer substantive evidence grounded in intersectionality then what was counted as evidence?

The Roadmap is one example of a comprehensive analytic document, representing a collective voice of people with lived experiences and firmly grounded in intersectionality. Even though the NAP follows the structure offered by the Roadmap, the Roadmap is not directly cited in the policy and the two documents are not linked. Given the weak intersectional paradigm of the background and introduction of the NAP, there is no evidence that the authors of the NAP have substantively engaged with "over 1000 recommendations" mentioned in the policy.

On the surface level, the NAP recognizes the importance of future engagement with key communities. It suggests that "federal, provincial, and territorial governments, Indigenous organizations, GBV direct service providers, researchers, the private sector, and victims, survivors and their families work together" to achieve the NAP's vision. The plan notes that the GBV Secretariat at WAGE will be responsible for this coordination (WAGE 2022b, "The Found-

ation"). Complimentary strategies are promised to be developed to support federal and provincial/territorial coordination. Unfortunately, the proposed mechanism lacks clarity.

The authors of the Roadmap have been calling on the government to establish an overarching NAP supervisory body and suggest that "independent oversight gives the NAP its best chance at strategic, long-term success" (Homepage, National Action Plan). However, two years after the NAP was launched, it is still not clear if and how the overall oversight board will be created, and there are no specific recommendations about it in the policy. The "Opportunities for Action" section related to engagement mostly talks about research and knowledge mobilization. It may be expected that stronger engagement mechanisms will be developed on the provincial level, but the national policy does not contain strategies that would ensure transparency for the NAP as a whole.

Symbolic Intersectionality in Addressing Systemic Issues

The third IBPA question guiding my analysis was: "How will proposed actions address intersectional inequities?" A critical characteristic of an intersectionality-based policy is the attention to intertwined powers that produce inequities operating on structural, cultural, disciplinary, and interpersonal levels (Collins and Bilge 2020); this attention must inform and guide policy responses. The NAP acknowledges the problems resulting in inadequate responses to GBV, such as systemic racism and discrimination, but does not deal with them in any substantive way. For example, the NAP suggests that "people are often reluctant to report GBV due in part to stigma, shame, fear, and systemic issues, which may lead to a lack of confidence that the justice response will be effective" (WAGE 2022b, "The evidence"). The NAP does not specify what those systemic issues are. The document could, for example, discuss victim-blaming by the criminal justice system, retraumatization of the survivors, and low conviction rates, among other issues. In another part of the document, the NAP describes the "underlying intersectional factors" as "systemic racism, discriminatory practices and institutional deficiencies that prevent survivors from experiencing just outcomes" (WAGE 2022b, "Pillar three, footnote"). Again, the NAP does not specify what institutional deficiencies it is referring to; it also does not discuss the link between the listed factors and barriers to accessing adequate GBV services. As a result, the solutions to addressing intersectional inequalities remain vague and are unlikely to address the systemic causes of GBV and the inaccessibility of GBV services.

To answer the question of how intersectionality could be deployed more authentically, we can look at the following example from the Roadmap:

> Survivors of VAW/GBV, including sexual assault, do not often avail themselves of protections provided by the law and when they do, they often report re-victimization and/or re-traumatization. Since the services that are available are usually underfunded and piecemeal (i.e., legal aid lawyers frequently have strict limits on their hours and cannot complete all aspects of a file) survivors also require continuity of support. In the criminal law context, unless victims are also the accused, they do not have their own lawyer. (Dale, Maki and Nitia 2021, 80)

In contrast to the NAP, the Roadmap provides a sufficiently detailed contextual analysis, for example, of the "'twin myth' that the complainant is more likely to have consented or [is] less worthy of belief" (despite the adoption of the "rape shield" provisions in the Criminal Code in 1992) and the lack of lawyers specializing in representing survivors within the governmental system. This makes it clearer what is understood in terms of systemic barriers and allows the Roadmap to offer tangible solutions, including, for example, access to Survivor Advocates and expanded community-based wrap-around services (Dale, Maki and Nitia 2021, 79-80). The Roadmap also advocates that the "Correctional Service Canada's (CSC) risk assessment tools that disproportionately impact racialized, Black, and Indigenous women" should be revised using an intersectionality-based perspective (Dale, Maki and Nitia 2021, 86). This action would contribute to addressing the problem of over-incarceration of specific groups and thus help resolve the issue of GBV under-reporting. These are a few examples from hundreds of targeted strategies laid out by the Roadmap. Unfortunately, the NAP failed to achieve the same level of specificity in addressing the root causes of problems through intersectionality-informed solutions.

It may be argued that the elaboration of concrete actions is expected to happen on the provincial level. However, certain policies are under federal jurisdiction (e.g., criminal law, divorce, employment and social development policy, labour laws, and immigration policy) and there are areas where provincial and federal policies work in tandem. This allows for the formulation of more specific recommendations while leaving room for local adjustments. On the surface, the NAP commits to intersectionality but does not make substantive attempts to provide actionable intersectionality-informed recommendations. Ahmed (2016) talks about such commitments as a way of not doing things by appearing to do them.

The NAP's Accountability: Same Methods—Different Results?

The last IBPA question used for this analysis was: "What intersectional factors will be measured within the evaluation of the NAP and how?" The NAP describes applying an intersectional approach as challenging due to the limitations of data: "It is difficult to apply an intersectional lens to existing data, as available data only highlights specific forms of GBV on individual populations such as Indigenous Peoples or people with disabilities, for example, but not the experience of Indigenous people with disabilities" (WAGE 2022b, "The Evidence"). While vaguely acknowledging the need for change, the NAP builds its monitoring and reporting system around conventional performance indicators and existing data collection mechanisms. As stated within the document, the data will be collected by Statistics Canada through the Homicide Survey, Survey of Safety on Public and Private Spaces (SSPPS) and General Social Survey on Victimization (GSS). There is no recommendation for reconsidering the nature of the results-tracking system so that it is firmly grounded in an intersectional approach, when good guidance for doing so exists. For example, emergent research offers intersectionality-informed mixed-method approaches to data collection and analysis (Grace 2014). Methodological advances such as survey data harmonisation, big data, and mobilization of interdisciplinary perspectives can help apply the intersectional framework to generate insights about policymaking, impact, and effectiveness (Dubrow and Ilinca 2019). In addition, considering alternative ways of understanding what may serve as evidence can expand intersectional understanding (Hankivsky 2012).

The NAP, however, makes no attempts to embed intersectionality in the design of the monitoring and evaluation (M&E) framework. The NAP suggests that "whenever possible, data will be further disaggregated by gender identity or expression, Indigeneity, sexual orientation, age, race, status, disability, geography (provinces or territories; urban or rural/remote/Northern) and by any other available identity factor(s)" (WAGE 2022b, "Reporting and monitoring"). Data disaggregation alone may not be enough to ensure an intersectional approach to M&E. For example, there is evidence that the responses towards GBV within the Canadian healthcare system reproduce ableism and other power relations that restrict "access to care and justice for women with disabilities and those who are historically marginalized" and sustain "the conditions that create vulnerabilities to GBV for these groups" (Grand'Maison 2024, 152-153). The existing progress tracking methods might, for example, show whether or not service utilization and satisfaction have changed, but they cannot assess whether or not the power relations have changed.

Without deploying a truly intersectional M&E framework it will be impossible to assess if the NAP is making a difference in transforming such structural issues as the healthcare system's ableism. One set of recommendations within the NAP pertains to "design, development and implementation of holistic performance measurement frameworks that are by, for, and accountable to Indigenous women, girls and 2SLGBTQQIA+ people, no matter where they live" (WAGE 2022b, "Reporting and monitoring"). This important aspiration should be extended to other marginalized communities.

Discussion and Conclusion

While intersectionality became "the gold standard of feminist work" (Nash 2019, 43), it can be used in ways that neutralize its transformative potential (Bilge 2012). My analysis suggests that even though the Canadian NAP rhetorically values this analytical framework, it engages in "the symbolic performance of intersectionality" (Mirza 2022, 196). The policy is premised on a deflated definition of intersectionality preoccupied with identities more than with the intersections of systemic inequalities. Within the document, there is no sound analysis of how intersecting social

structures create different types of vulnerabilities for the groups experiencing the highest rates of GBV and how existing policies and practices recreate and sustain barriers to addressing the needs of these groups. The in-depth intersectional analysis provided by the Roadmap—a guiding document produced by the leading Canadian front-line organizations addressing GBV—is ignored. The NAP follows the structure of the Roadmap but it does not have the same level of nuanced background analysis and recommendations. Without contextualization within the lived realities, the NAP's recommendations remain too vague to produce tangible results. There is no evidence of meaningful engagement with the most affected groups. The text of the NAP implies that detailed strategies and actions are to be elaborated on the provincial level. However, the national policy provides a weak example of embedding intersectionality for the provincial-level plans. Since the NAP's M&E does not integrate an intersectional lens, there are no accountability mechanisms to ensure that an intersectional approach to policy is used on the provincial level.

The NAP's use of intersectionality is non-performative: the document labels solutions as intersectional to mask an absence of real action. By communicating the value of intersectionality, the NAP presents itself as an intersectionality-based policy despite the lack of mechanisms to operationalize intersectionality and be accountable for it. Rezai-Rashti et al. (2021, 9) discuss institutional commitments to diversity and inclusion suggesting that "having a good policy ultimately shields and protects the institution from having to effectively perform the policy"; similarly, declaring a commitment to intersectionality within the NAP allows it to bypass deploying transformative solutions.

Scholars have demonstrated that there is resistance at the governmental level to applying intersectionality within policymaking, especially within enforceable initiatives (Manning and Levac 2022). Intersectionality as a knowledge project operates within the same socio-cultural and political context that it strives to transform (Cho, Crenshaw, and McCall 2013), thus it is susceptible to de-politicization, co-opting, and misuse. In my analysis of the use of intersectionality within the Canadian NAP on GBV, I demonstrate how such a de-orientation of the concept happens within this policy document. Ahmed (2016, 2) argues that non-performativity reveals institutional mechanics of "how things are reproduced by the very appearance of being transformed." The NAP contains the risk of further disadvantaging people with multiple intersecting identities in the context of GBV and reinforcing the systemic powers that work collectively to marginalise them. Through non-performative use of intersectionality, the plan re-institutionalizes attention to already relatively privileged groups, while the needs of most vulnerable groups continue to be neglected. The non-performative deployment of an intersectional approach within the NAP leaves little hope that the vision of Canada free from VAW and GBV will come true in the near future.

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