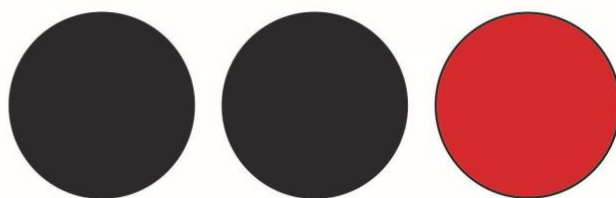




**BATTERED WOMEN'S
SUPPORT SERVICES**



Safety Changes Everything

Beyond Recognition: Ensuring Bill C-16 Delivers Safety for Survivors of Intimate Partner Violence

Speaking Notes to the Standing Senate Committee on Legal and Constitutional Affairs on Bill C-16, June 12, 2026

Good afternoon, Honourable Senators. Thank you for the opportunity to appear before you today on your study on Bill C-16.

My name is Angela Marie MacDougall, and I am the Executive Director of Battered Women's Support Services in Vancouver, British Columbia. For more than 45 years, BWSS has been on the frontline in prevention and intervention of intimate partner violence specifically and gender-based violence overall.

Four decades of frontline response to approximately 50,000 requests of service annually and the 1200 survivors who reach out to us monthly have taught us two things simultaneously: victims-survivors want intimate partner violence to stop, and they want policing and legal systems that help rather than harm.

Historically, we have treated intimate partner violence as a private matter, and more recently as a criminal justice issue. Bill C-16 presents an opportunity to understand it as a public safety issue requiring coordinated prevention.

BWSS supports the intent of Bill C-16. Recognizing coercive control and femicide within our legal framework is an important

evolution in Canada's understanding of intimate partner violence. Survivors have taught us that safety requires more than stronger laws; it requires systems capable of recognizing coercive control, acting on lethality risk, and responding without causing further harm.

The question before this Committee is not whether survivors deserve stronger responses. They do. The question is whether Bill C-16, as implemented, will deliver greater safety.

Our frontline experience tells us that one of the greatest challenges in responding effectively to intimate partner violence is that legal and other systems routinely misunderstand the nature of the violence itself. Routinely, intimate partner violence is approached as a series of isolated incidents. Survivors, however, experience coercive control as a pattern of domination, entrapment, and deprivation of liberty that escalates over time.

When we focus only on a single incident, we are looking through the wrong end of the telescope. The question is not simply, "What happened?" The question is, "What has been happening over time?"

As we consider these reforms, we must recognize that Black, racialized, and Indigenous women, girls, and Two-Spirit people experience disproportionate rates of intimate partner violence, including femicide, and often face compounded risks of both victimization, criminalization and child apprehension. Along with who may not be considered the perfect victim

Our legal advocacy team and the lawyers on our board of directors have identified key areas for change because our greatest concern is that laws intended to protect survivors may inadvertently cause further harm. Survivors often experience a double harm: first from the person using violence against them, and then from systems that misinterpret their efforts to survive.

Protection must never become punishment.

The Supreme Court of Canada in *Ahluwalia* cautioned against failing to distinguish between coercive control and survivors' acts of resistance. Without clear safeguards and contextual, pattern-based analysis, survivors risk being criminalized for actions taken to preserve their safety, autonomy, dignity, and the wellbeing of their children.

Bill C-16 presents an opportunity to move Canada from reacting to violence after it occurs to preventing it before it becomes lethal.

The tragedy is not that lethal risk in intimate partner violence cases is unknowable. The tragedy is that it is often known, yet policing and legal systems fail to act in ways that provide protection.

Experience from other jurisdictions demonstrates that legislation without implementation does not improve safety. The strongest laws are not those that appear toughest on paper. The strongest laws are those that prevent violence, hold perpetrators accountable, and keep survivors safe.

At minimum, Bill C-16 must include safeguards against survivor criminalization and ensure implementation through system accountability, effective use of risk assessment, and deeper commitment to community-based supports.

Ultimately, we will measure Bill C-16 not by what it recognizes, but by whether survivors and their children are safer because of it.

Thank you.