What is FGM?

According to the World Health Organization (WHO), female genital mutilation (FGM) refers to any procedure involving total or partial removal of the external female genitalia or other injury to the female genitals for non-therapeutic reasons such as custom and cultural, religious, social or other beliefs. By causing ‘an irreversible reduction of human capacity’, FGM constitutes an extreme form of gender-based violence.

It is estimated that at least 200 million women and girls currently live with the consequences of this practice. Carried out on women and girls of various ages from new-borns to women about to be married, FGM is prevalent in at least 28 countries in Africa, some communities in the Middle East and Asia, and certain ethnic groups in Central and South America. Increasingly, almost all countries are facing the challenge of FGM within diasporas.
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About 28 Too Many

28 Too Many is a research organisation created to end FGM in the 28 African countries where it is practised and in other countries across the world where there are diasporas of practising communities.

Founded in 2010 and registered as a charity in 2012, 28 Too Many provides a strategic framework where knowledge and tools enable in-country anti-FGM campaigners and organisations to be successful in making sustainable changes to end FGM.

We are building an information base that includes detailed country profiles for each country in Africa (and its diaspora) that practises FGM. We campaign and advocate locally and internationally to bring change and support community programmes to end FGM.

28 Too Many has firmly established its reputation with both influencers and grassroots advocates as a leading anti-FGM voice for Africa. 28 Too Many research is used by United Nations agencies, governments, law enforcement, international donors, global non-profit organisations and local activists to help shape their ongoing work to end FGM in Africa and the diaspora.
This impact is driven in part by our work to effect change by:

1. **Collating and interpreting data (research)**

   We present data in a number of ways, primarily in country profiles and thematic papers, in addition to research products such as factsheets, as required. To support our aims, we make all research freely available globally.

2. **Influencing influencers (top-down approach)**

   Using the data we have collated, we engage influencers, encouraging them to advocate for change (of policy, legislation, etc.) within their spheres of influence.

3. **Supporting community change (bottom-up approach)**

   Based on our research, we develop and distribute advocacy materials, training tools and curricula that local organisations can use to bring effective change at a community level.

   We believe that, as part of a bigger movement, change happens when policy and legislation (top down) align with community action and education (bottom up). Our approach is to play a catalytic role in both and to base our interventions on solid ethical research.
Ann-Marie’s Thoughts

As I sit to write my final thoughts for this 28 Too Many 10th Anniversary Annual Review, it is with feelings of incredible happiness, at a job amazingly well done by our team, and yet with sadness at the end of a chapter in this story. Our theme for the last few years at Board level, has been to ensure sustainability and succession planning, as I had chosen that my role as Founder and Executive Director would be for twelve years, from joining Church Mission Society in 2010, prior to setting up the charity in 2012.

As the end of 2022 looms, I am delighted to be passing on the baton to a newly recruited Kenyan CEO of the Orchid Project, Asenath Mwithigah – based in Kenya.
Ann-Marie with Carrie Grant at the 10-year celebration
She will lead the team of around twenty from the two charities, with staff based in Kenya and the UK. As we have had all our staff working remotely from our inception, we are pleased this model will continue for everyone, post-merger, applying the learnings of the pandemic, where I shielded for an incredible 57 weeks.

As I reflect on the successes of the last twelve months, it started with the flurry of activity around Anti-FGM Day and our work for International Women’s Day, where we featured in an article for the Royal College of Midwives. This was on “Inspiring women – choosing to challenge”, for our work on, Anti-FGM social norms.

On June 16th we were excited to mark the Day of the African Child, with my book launch – Overcoming: My Fight Against FGM. We had interviews on UCB, Premier and Trans World Radio, and talks with St Barnabas Church, Mosaic Women, and at All Nations College (ANCC). In July, I became a lay sister in the Benedictine Order and met up with my global peers from the Church Mission Society (CMS), for a picnic cream tea in Birmingham! I also spoke at the UN Generation Equality Forum on our anti FGM work.

After a long pandemic lockdown, I had a few summer treats – attending Wimbledon finals with a gifted ticket, and three mini
breaks in the UK. I also registered for the deferred London Marathon and got in training – managing the event in 8 hours – pretty good with my collection of disabilities! Thanks for all the donations to North London Hospice.

![Guests at the 28 Too Many 10-year celebration](image)

November saw us delivering training to the Met Police, US and UK Border Forces, Crime Stoppers, five regional police forces and key dignitaries. I also did a handful of talks on our work to churches in Shoebury; Swanwick (Derbyshire); ANCC in Hoddesdon; and locally – sharing the book lessons and learnings, distilled over ten years of pioneering.

After our AGM, we featured on New Wine TV and our intern helped deliver an anti FGM podcast with others from Kings College London
University, as we explored a film on my life, to tell the back story of our anti FGM messaging to a generation of 20 year all.

A newly set up Community of Practice on children’s protection at ANCC, asked me to teach on anti FGM to their global members, which helps get the message and our learnings to a wider geographical audience.

Following our 10th Anniversary Party, which had Carrie Grant as compere, I was interviewed live on Radio London at 11.30 pm. This ended quite a day – commissioned cake, champagne and canapes, films, balloons, photos of friends and survivors from the sector, partners such as Royal College of Midwives, Met Police, faith leaders, educators; hosting a panel along with the Board and 28 Too Many team.

Panel discussion at the 10-year celebration. On the panel are Carrie Grant (compere), Dr Ann-Marie Wilson, Joanna Dunbar-Webb, DCI Allen Davis, Juliet Albert, and Janet Fyle (l-r)
Just as I thanked everyone at the party, I now want to thank all of you reading this review. It is a thank you:

- to those who showed faith in me and my God inspired vision of a world free of FGM, and safety for girls like Fatima.
- CMS, CEO’s, staff, leaders, colleagues, mission partners and managers - Tanas and Philip, who have supported me over the last 12 years of mission service.
- to my church, St Barnabas, and all the donors alongside WMS, whose gifts funded me, the team members and partners.
- to large corporate, philanthropic, grant and individual donors of our charity, which bought in £200K in its’ last full year – a great success for a team of 10!
- to the Board – now and all those serving over the years – a huge thank you for your wise service, contributing skill and knowledge.
- to the team of consultants and volunteers who have made this charity as productive and far reaching as it is.
- to my long-suffering PAs’ who have enabled me to keep working despite acute and chronic health challenges.
- to the founder of Orchid Project, Julia, who invited me to join her charity in December 18 – which completes the circle of our early internship relationship at Forward.
So what will I do next?

My plan at the moment is to retain four one day a week role’s with:

- Orchid Project – Senior Research Adviser
- Marie Curie – Chaplaincy Bereavement Support
- Noah’s Ark Children’s Hospice – Chaplain
- St Barnabas Church – Lay Pioneer Minister (Staff) and Pastoral Team, with other roles as needed.

Having had complex hip surgery in May this year, with plenty of bereavements and losses close and global, that have touched me, I now plan to take a six-months study sabbatical. I also hope to finish my bucket list, whilst having time with friends, godchildren, and family – whilst I can! I am aware that time is short, so I hope to be a good steward of the precious time I have left!

Thank you, and keep in touch.

Dr Ann-Marie Wilson (Executive Director)
The Board’s Thoughts

As we celebrate our 10-year anniversary, I cannot help but reflect on 28 Too Many’s journey and the ongoing fight against FGM. 28 Too Many has achieved so much through high-quality research and relentless advocacy thanks to the ongoing support of our donors and supporters, as well as an incredible team dedicated to our mission. This year is yet another example of the amazing work produced by our team: we now have country reports covering all 28 countries in Africa where FGM is still prevalent and we expanded our research to cover FGM across the 32 countries of Europe, looking at the laws currently in place and laying out a call for action from European Governments.

Whilst we surpassed our vision of a 10 percent reduction in FGM in 10 countries over 10 years, we are mindful of the work that is still needed, especially as the pandemic impacted the fight against FGM across the globe. In the last few years, we have thought deeply about what the next 10 years would bring for 28 Too Many, how we would maximise our impact, whilst ensuring the long-term sustainability of the organisation. It became apparent that joining the Orchid Project family (an NGO also working to end FGM) was the most logical next step for us. This merger took place in April
2022. Joining the Orchid Project family to develop their research capacity is an exciting opportunity for our team to continue and expand our work, linking our research to the grassroot work Orchid Project undertakes. It has been a pleasure to work with the Orchid Project team to make this merger happen and we look forward to seeing the work that our joint forces deliver.

It has been a privilege for each of us on the Board to be involved with such an amazing organization as 28 Too Many. On behalf of the Board, I would like to thank the team for their continued hard work, especially during this uncertain time. I would also like to thank our donors and supporters, recent and long-standing, for their trust in our work and impact they have made. I would also like to give my thanks specifically to Ann-Marie, without whom 28 Too Many would simply not exist. I applaud her dedication in setting up the organisation 10 years ago and relentlessly advocating against FGM since then.

**Dominique Carrie** (Board Chair)

**The 28 Too Many trustees are** Dr A. M. Wilson (Executive Director), D. Carrie (Chair), T. Alqassis, J. Dunbar-Webb, D. Farag, M. Galpin, and S Mamayimbe.
Research Focus

In 2021/22 we published 36 new reports including reports covering FGM legislation in 32 European countries as well as two Short Reports. 28 Too Many also continued to contribute to global intelligence briefings to the Metropolitan Police. We continued to mobilise significant pro-bono volunteer research support in 2021/22. This enabled the following reports to be produced:

a. The Law and FGM in Europe
As part of the 16 days of activism against gender-based violence, 28 Too Many published 32 country reports each documenting the application of national (criminal) laws to the commission of FGM and any possible related crimes.
Each report also explores other legal factors deemed relevant, such as legal obligations to report the commission or likely upcoming commission of FGM, available legal protective measures for girls and women at risk of FGM, and any obligations of national governments in relation to FGM.

The reports provide a vital reference for those seeking to prevent FGM in their countries and include recommendations that could form part of national advocacy campaigns.

**The summary report calls for the following actions on the part of European governments:**

- Those countries without prevalence data conduct research to estimate the number of women and girls impacted by FGM.

- All countries are called on to ratify the Istanbul Convention.

- Those countries without specific FGM legislation confirm the application of general criminal law to FGM.
• All countries align the definition of FGM maintained in their laws with that of the World Health Organisation.

• All countries specifically criminalise the procuring, aiding and abetting of FGM.

• That relevant professionals and institutions be obligated to report FGM.

• All countries extend the extraterritorial application of their national criminal laws to the performance of FGM, always regardless of double criminality.

• Countries instate a system to effectively protect uncut women and girls.

b. Short Report Series

In 2021/22 we published a further two Short Reports for Guinea (94.5%) and Djibouti (93.1%). These two short reports mean that 28 Too Many has now published reports for all 28 countries of focus in our original vision.
Advocacy and Communications

**Overcoming: My Fight Against FGM**

On the Day of the African Child, 16th of June, Dr Ann-Marie’s book ‘Overcoming: My Fight Against FGM’, was published. The book tells the story of how, after taking a break from her corporate job to volunteer for a medical relief charity in Sudan, Ann-Marie met a girl called Fatima in West Darfur who had been ‘cut’ at the age of five and was pregnant at 10, after being attacked and raped by armed militia.
After meeting Fatima, Ann-Marie trained in cross-cultural studies, anthropology, gender and development, followed by midwifery and fistula rehabilitation in Nigeria. Following her re-training, Ann-Marie volunteered for a UK anti-FGM charity, and then in a refugee camp on the Somali border in Kenya, before founding 28 Too Many in 2010 to specifically address FGM across Africa and the diaspora.

Ann-Marie commented; “’Overcoming: My Fight Against FGM’, lifts the lid on a practice that impacts far too many lives. It is my story, Fatima’s story and sadly the story of millions of women and girls who continue to live at risk today”.

**Met Police and Crimestoppers**

Throughout the year we delivered expert training on several occasions in support of the Metropolitan Police and Crimestoppers efforts to equip embassies in Africa, together with the British and American border forces and five UK police forces, in their FGM prevention work. This training builds on our long partnership with Metropolitan Police and other government agencies.
Launch of the EU Law Reports

The 16 days of activism wrapped up in December with the launch of our latest research - a series of reports on the application of national laws to the commission of FGM in 32 European countries. At the launch event, 28 Too Many presented the key findings from across all 32 country law reports. The event included presentations by Dr. Ann-Marie Wilson, Founder and Executive Director of 28 Too Many, Dr. Annemarie Middelburg, the primary report author and Hannah Martin, a senior lawyer, and lead on the pro-bono support team at Ashurst LLP.

The initial research conducted for these reports consisted of a questionnaire developed by 28 Too Many and Ashurst LLP. The information contained in the responses to that questionnaire was then reviewed by Middelburg Human Rights Law Consultancy, updated, and used as the basis of further research from relevant sources. The reports are mainly based on primary legal sources such as legislation, case law, and authoritative literature, but do also use secondary sources such as government documents, journal articles, and newspaper articles. The reports are available online at 28toomany.org/law
Women's rights are human rights.
10-year anniversary

The financial year ended with us celebrating our tenth anniversary, with a party generously hosted by Ashurst law firm. It has been remarkable for us to reflect on surpassing the ten-year goals we set as we started out – to see a 10 per cent reduction in FGM in 10 countries over 10 years.

During the evening, we celebrated our shared achievements – societal changes away from FGM, and the reduction in prevalence. We heard stories of hope from women who have been supported in their journey, or who have avoided being subjected to FGM at all. We also watched the premiere of a film we commissioned, focusing on positive changes in Kenya.
Ann-Marie with Tanas Alqassis at the 10-year celebration
28 Too Many joins Orchid Project

28 Too Many is delighted to share that from April 2022 we will join Orchid Project. 28 Too Many joining Orchid Project provides an opportunity to draw on the unique strengths and experiences of both organisations, ultimately enhancing the movement to end FGM. Orchid Project is also an NGO catalysing the global movement to end FGM. Orchid Project partners with pioneering grassroots organisations globally sharing knowledge and best practice to accelerate change. It also advocates among governments and global leaders to ensure work to end FGM is prioritised.

28 Too Many brings to Orchid Project a wealth of experience in evidence-based research, which has received wide recognition over the last twelve years, including our 2018 Law and FGM
report receiving the Thomson Reuters Foundation TrustLaw Collaboration Award and the #NoFGM Ribbon campaign received over 11 awards at the Dubai Lynx Awards in 2019. 28 Too Many’s work in generating high-quality research and advocacy tools has influenced policy reform, including the criminalisation of FGM in Nigeria and Sudan. Anne-Marie has also been invited, as an FGM expert positioned to advise multinational agencies including the United Nations, Population Council, governments, and the World Bank over the last few years.

As part of this exciting step, Orchid Project will work closely with the research team that have supported 28 Too Many’s work to date. The combined experience of the 28 Too Many team, particularly that of Dr. Ann-Marie Wilson who has been at the forefront of ending FGM for over a decade, will help drive forward Orchid Project’s research and evidence function and shape the production of new country profiles and themed reports on FGM.

“We are delighted to welcome the 28 Too Many team and look forward to the next chapter for Orchid Project,” said Delphine Rive, interim-CEO of Orchid Project at the time of the merger. “Our decision to join forces is driven by a shared vision of ending FGM through community-led change and we are confident that with our
combined expertise and networks, we will be better positioned to positively impact the lives of girls and women by enabling evidence creation and its effective use to accelerate an end to this practice.”
Commenting on 28 Too Many joining Orchid Project’s team, Dr. Ann-Marie Wilson said, “Over the last 12 years, 28 Too Many has worked in parallel with Orchid Project to embrace and drive forward ending FGM. We have been happy to work alongside Orchid Project in their endeavours over the last decade. We look forward to working together by joining forces to increase our collective impact in the sector.”

28 Too Many brings an established research, advocacy and communications charity to Orchid Project, helping it to play a key role in providing high-quality evidence and best practice needed to guide policy and decision making as well as donor investments in the Anti-FGM sector. This evidence and research coupled with Orchid Project’s existing programming, advocacy and movement building efforts will strengthen the capacity of organisations and activists globally and support them to bring an end to FGM by 2030.
Financial Information

The Trustees have worked for an extended period towards merging with Orchid Project, an Anti-FGM charity. We are very grateful for the generous donations throughout the pandemic, enabling us to have rich choices for securing our future. Assets were transferred in April 2022 and the trustees intend to dissolve the 28 Too Many entity by the 31st of March 2023. Thus, this year’s financial statement has been prepared on a basis other than that of a going concern for the year ended 31 March 2022.

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<th>Apr 20–Mar 21</th>
<th>Apr 21–Mar 22</th>
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<td>Consultancy income</td>
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<td>Total income</td>
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<th>Expenditure</th>
<th>Apr 20–Mar 21</th>
<th>Apr 21–Mar 22</th>
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<td>Charitable activities</td>
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<tr>
<td>Governance costs</td>
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<td>£432</td>
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<tr>
<td>Total expenses</td>
<td>£93,752</td>
<td>£80,128</td>
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Thank You

28 Too Many gratefully acknowledges the many individual donors who share our vision and give generous donations to fund our work. We also thank the charitable trusts and organisations that have contributed to our work, including Church Mission Society (CMS), the Jane Metson Foundation, the Women’s World Day of Prayer, Reed Smith LLP, Shoeburyness & Thorpe Bay Baptist Church, and the many other donors and philanthropists who wish to remain anonymous, yet made our work possible.

28 Too Many wishes to thank Ashurst LLP for their partnership with us on the FGM and the Law in Europe research. We especially wish to thank the pro bono teams for the many hours they spent on this vital project. We would not be able to do this research without you and your networks across the world.

We also wish to extend our thanks to the many other individuals and organisations who offer support, expert advice and pro bono services. Your help greatly encourages us, and we are grateful to everyone who assists our work, especially CARE, CMS, Grant Thornton UK LLP, LandMark Chartered Accountants, Helena Sharpstone and Lawrence Ding. Finally, we want to thank all the 28 Too Many volunteers who contribute in so many ways.