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.
‘The report highlights 28 Too Many’s role in reducing knowledge gaps, and helping partner organisations to design programmes and secure funding.’ – The Research People
Ann-Marie’s Thoughts

The theme of this year has been establishing meaningful change. Our summer highlight was the publication of our FGM and Social Norms report, which addressed the cultural and behavioural factors that affect the practice of FGM and how they vary across different countries and traditions. It is only when these are understood that effective anti-FGM programmes can be developed, successfully deployed and established for generations to come.

We have seen an incredible increase in awareness of social norms in the past year, and our report has been a timely and welcomed tool. Our heartfelt thanks go to our co-author, anthropologist Dr Anneke Newman and contributor Dr Judi Aubel of The Grandmother Project for their knowledge and experience. Their learnings will go on to influence and inspire substantive change for girls at risk and their future daughters.

We have also supported the establishment of the first NHS FGM clinics in the UK. Many survivors often only come into contact with NHS services when they become pregnant. These eight clinics will support survivors of FGM at all stages of their experience and provide them with quicker access to support and expert care. This marks the biggest step towards addressing FGM in the UK since
mandatory reporting was introduced in 2015. It acknowledges that these women deserve comprehensive care as well as protection. We were thrilled to be part of the United Nations’ Beijing+25 events on the 25th anniversary of the Beijing Platform for Action – considered the most ambitious road-map for the empowerment of women and girls everywhere and adopted unanimously by 189 countries. We were able to share our research and advocate for women and girls affected by and at risk of FGM in a comprehensive week of events and guidance documents that will influence policy-makers and heads of state worldwide. Although recent years have seen landmark moments in the public support for women’s rights, with movements such as #MeToo finding international traction and local spinoffs in hundreds of languages, we are reminded that this is a marathon, not a race. We are still working hard to meet the commitments set down in 1995 by our forerunners, and we need to find ways to ensure that our victories are set in stone for our successors.

In November, we published our 15th country profile, this time for Sudan, where the prevalence of FGM in women aged 15–49 is 86.6%. It is one that is incredibly close to my heart, as it is where my 28 Too Many story began. We have come a long way since my first encounter with FGM in an aid camp in West Darfur, when I met a young girl of ten, pregnant and orphaned by the militia. The changes
Dr Ann-Marie Wilson at the United Nations in Geneva
happening in this country give me hope that one day the daughters and granddaughters of the girl I met will be protected from FGM.

On 8 March 2019, International Women’s Day, we published *FGM Model Law*. This ground-breaking new report highlights the features that an anti-FGM law should have, providing a benchmark for assessing the strengths and weaknesses of current legislative frameworks in different jurisdictions where FGM is still practised. *FGM Model Law* builds on the success of the award-winning series
of reports on FGM laws in 28 African countries that were published by 28 Too Many in 2018. Legislation is important because it is a statement of intent and demonstrates a commitment to eradicating FGM. We thank our collaborators, TrustLaw and top international law firms Reed Smith LLP, Cleary Gottlieb Steen & Hamilton LLP and Latham & Watkins LLP for their dedication and meticulous work in developing these important tools, which have already influenced laws and changed the lives of women and girls.

As we move into the new decade, we are able to review our many fantastic achievements and start to plan for the next season of the charity. Our grateful thanks go to Yemi Garuba, who has been our acting board chair during this transformative year, and we warmly welcome Rev. David Mayne as Chair for the next part of our campaign.

We thank all of you who make it possible for us to continue this work: our donors and fundraisers, volunteers and team, trustees, supporters and collaborators. Without each one we would not be able to achieve these remarkable feats and change so many lives.

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

It has been a remarkable year of achievements for 28 Too Many and wonderful to see our charity continuing to make such important and lasting impacts on the international stage. With the publication of our 15th country profile and additional short reports, we now provide resources to tailor with our award-winning country law reports for all 28 countries in Africa where FGM is still prevalent.

We have also been delighted at the increasing numbers of organisations and individuals around the world taking up our #NoFGM ribbon as their symbol in the fight to end FGM. It is all too important that FGM remain a visible issue when many girls are at risk behind closed doors.

We have already felt the impact of COVID-19 as the new year begins. We will have much work to do in the changing landscape to continue our work, online where necessary, to reach those who are at risk of FGM and affected by the global pandemic, and ensure the legacy of 28 Too Many’s research is secure.
The 28 Too Many Board and staff team include (L–R) Selina Pang, Sylla Mamayimbe, Sara Yemane, Tanas Algassis, Ann-Marie Wilson, David Mayne, Caroline Pinder, Yemi Garuba and Sean Callaghan
The Board is proud to share the positive impacts of 28 Too Many’s work and research with grassroots programmes, policymakers and heads of state. It is absolutely essential that the results of this work continue and remain freely available to all those who need it.

We are delighted to welcome two new members to our Board this year:

- Mama Sylla is an anti-FGM activist who campaigns to raise awareness of FGM among the Guinean community in the UK, running workshops with other survivors to educate and combat misinformation. Mama Sylla grew up in Guinea, where the prevalence of FGM in women aged 15–49 is 96.9%, with 70% of those women having been cut between the ages of 5 and 14. Until moving to the UK and meeting with a specialist FGM team while pregnant, Mama Sylla had not realised the extent of the issue. She was inspired to raise awareness among the Guinean and West African communities, founding her charity La Fraternité Guinéenne in 2016. We are incredibly proud to congratulate Mama Sylla on being recognised with a Points of Light award from the British Prime Minister on International Zero Tolerance of FGM Day 2020.

- Sara Yemane joins us with a background in financial services. She began her career as an analyst and more recently moved
into client services, looking after charity clients. Sara volunteers at a homeless charity, finding great pleasure in giving back. Sara studied Business Management at university and brings to the charity business acumen, along with experience analysing investment portfolios. At a time when many charities, including our own, are facing challenges in fundraising, yet more demand for our important work, her experience is a welcome addition to our Board.

We thank Yemi Garuba for stepping in as acting board chair and her guidance as we start thinking about the next steps and future legacy of our charity. Yemi continues to make a substantive contribution as our vice chair, bringing her management and governance expertise to our work. We will also welcome new board members in the coming year.

28 Too Many’s original vision has blossomed with the help of many key collaborators and supporters, in particular our TrustLaw allies and pro bono teams at Reed Smith LLP, Cleary Gottlieb Steen & Hamilton LLP and Latham & Watkins LLP, who have graciously provided us with their time and immeasurable talents.

Finally we thank the team, volunteers and ambassadors for their hard work and dedication to the cause and the impressive and meticulous work they produce, which allows 28 Too Many to be a
globally recognised, award winning and celebrated essential resource to those fighting to end FGM.

We are, as ever, particularly indebted to Ann-Marie, our executive director, for her continued fortitude and determination to ensure 28 Too Many remains a leader in the field.

Rev. David Mayne (Board Chair)

The 28 Too Many trustees are Dr A. M. Wilson (Executive Director), D. Mayne (Chair), O. Garuba (Vice Chair), T. Alqassis, M. Galpin, S. Michaels, S Yemane and M Sylla.
‘In particular, the activists and local organisations we interviewed highlighted the value of 28 Too Many’s partner-centric approach.’

– The Research People
Research Focus

We continued to mobilise significant pro-bono volunteer-research support in 2019/20. This enabled the following reports to be produced:

Country Profile Report: FGM in Sudan

We published Country Profile: FGM in Sudan (our 15th country profile) in 2019/20. Overall, the prevalence of FGM in Sudan remains among the highest in the world, at 86.6%. Data from the MICS survey of 2014 reveals a distinct trend towards a lower FGM prevalence among younger women. FGM is generally referred to in Sudan in two ways: the least severe form is called ‘sunna’, which is an Islamic term meaning FGM involving partial or total removal of the external clitoris (equating to Type I or Type II by the WHO’s definition, depending on the extent of the cutting). The more severe form of FGM is referred to as ‘pharaonic’ or ‘infibulation’, and this equates to the WHO’s Type III. 77% of Sudanese women in the 15–49 age group who have been
cut have been ‘sewn closed’ (Type III/infibulation), 16.3% have had flesh removed and 2.2% have been ‘nicked’.

Our report was published as the country underwent significant political reforms that resulted in the introduction of new legislation banning FGM. Our report was often quoted by global media, such as the New York Times, and NGOs as a key reference during these developments, helping inform cultural change.

A Model FGM Law

In 2019/20, 28 Too Many, in collaboration with TrustLaw, the Thomson Reuters Foundation’s legal pro bono service, partnered with international law firms Reed Smith LLP, Cleary Gottlieb Steen & Hamilton LLP and Latham & Watkins LLP to draft a model law in relation to FGM. It builds on the success in 2018 of this partnership in publishing a report entitled The Law and FGM: An Overview of 28 African Countries, together with 28 individual accompanying reports identifying current legislative frameworks in those
countries. These reports identified examples of good practice and highlighted where gaps in legislation remain.

The *FGM Model Law* is based on six features that 28 Too Many identified as the minimum necessary for anti-FGM legislation to be effective. They are as follows:

- provide a clear definition of FGM;
- criminalise the performance of FGM;
- criminalise procuring, arranging and/or assisting acts of FGM;
- criminalise the failure to report incidents of FGM;
- criminalise the participation of medical professionals in acts of FGM; and
- criminalise the practice of cross-border FGM.

Our *FGM Model Law* serves as a comprehensive guide for policymakers and stakeholders, NGOs and activists. It highlights features that any anti-FGM law (whether regional or national) need to include, providing a benchmark for assessing the strengths and weaknesses of current legislative frameworks in different jurisdictions where FGM is still practised.
Social Norms Change and FGM

There is an increasing consensus that FGM is a social norm or ‘socially upheld behavioural rule’. This means that people believe that ‘everyone does it’. Individuals practise it because they have never questioned behaving otherwise; they receive social benefits from conforming to the norm, or they fear social sanctions from others for deviating from it. Even when the adoption of FGM is recent, people can still be pushed to conform to another group’s social norms.

Determining whether FGM is a social norm in a particular situation is important for designing programmes, because when it is, it is difficult for individuals or individual families to stop the practice on their own, due to the social sanctions associated with deviating from the norm. Families will be encouraged to stop cutting their daughters if they are convinced that a sufficiently large number of other families do not practise FGM or are ready to abandon the practice.
Our report, *FGM and Social Norms: A guide to designing culturally sensitive community programmes*, explores these themes and proposes methodologies for designing effective strategies for anti-FGM programming.

**Short Report Series**

In 2019/20 we published *Short Reports* for the following countries: Benin (where the FGM prevalence is 7.3%), Cameroon (1.4%), Central African Republic (24.2%), Chad (38.4%), Côte d’Ivoire (36.7%), Ghana (3.8%), Guinea Bissau (44.9%), Mauritania (66.6%), Niger (2.0%), South Sudan (1.0%) and Togo (3.1%).
Research Impact

“Despite intensified efforts to eliminate FGM in Nigeria since a General Assembly Resolution in 2012, critical evidence gaps hindered a comprehensive, evidence-based response. However, our relationship with 28 Too Many, since 2014, has mitigated this challenge for us at SIRP Nigeria. 28 Too Many provided us with the high-quality evidence required to influence strategic investments, policy and programmes to eliminate FGM in Nigeria. Because of this evidence-based data provided by 28 Too Many, SIRP Nigeria have been able to:

- Ensure the passage into law of the Enugu State Violence Against Persons Prohibition (VAPP) Law, 2019. This law criminalised FGM and other forms of gender-based violence.

- Establish a dedicated telephone number to report all forms of gender-based violence and abuses, especially FGM and child marriage, particularly during COVID-19.

- Implement ‘naming ceremony without cutting’ in more than 20 communities in Enugu State, Nigeria, in the last year.”
‘Any time I need something around research and data around FGM, my first point of call is 28 Too Many.’

– Dr Chris Ugwu, SIRP Nigeria
Strategic Communications

Following the launch of the #NoFGM ribbon in Egypt in February 2019, we have been launching the ribbon worldwide. We coordinated with the US Network to End FGM to take the ribbon to the United Nations 63rd Commission for the Status of Women, New York in March. We partnered with them again at Women Deliver in Vancouver in June. This coincided with the launch of the #NoFGM website.

The #NoFGM ribbon was also launched for us by SIRP (Society for Improvement of Rural People) in Nigeria on 18 March, the International Day for the Elimination of Violence against Women. The ribbon was given to those taking part in SIRP’s workshop for new mothers in Udenu, where they were taught about the harm of FGM. Some mothers were then designated as #EndFGM champions to return and pass on the message to other mothers in their communities. In Nigeria, the majority of girls undergo FGM before the age of five, often shortly after birth at ‘naming ceremonies’. SIRP’s anti-FGM workshops focus on educating young mothers and mothers-to-be by introducing them to ‘naming ceremonies without the cut’.
The #NoFGM ribbon campaign has won numerous awards, including: Cannes Lions, Loeries Awards, Dubai Lynx, Adstars and Clio Awards.
To mark the one-year anniversary of the launch of the #NoFGM ribbon, we arranged for activists and organisations all around the world to post #NoFGM messages on 6 February, International Day of Zero Tolerance of FGM. We were overwhelmed by the response, which showed the huge amount of support there is for the ribbon and also for 28 Too Many. We also used the day to launch the ribbon in Sierra Leone, along with the Rescue Child and Youth Film Foundation and the HAWA Trust Foundation. This event, organised by male activists, proved to be very successful, and it was featured in the Sierra Leone press.
Somalia Research and #NoFGM Ribbon Launch

In June, the Somalia Key Findings, translated into Somali, were launched by NGO HILI in Mogadishu to an audience of the main anti-FGM partners and members of the Government. At the same event, the #NoFGM ribbon was officially launched in Somalia, with t-shirts, ribbons and headscarves featuring the ribbon provided by Impact BBDO. Somalia, with a prevalence of around 98%, is a key country with prevalent cutting and no laws against it. After the publication of our FGM Law Report last year, the Government made a commitment to introduce a law, yet progress had been very slow. Therefore this launch of our findings with HILI is seen as an important step towards achieving government support for a total ban on FGM.

Lawyer Awards 2019

The quality and professionalism of our law research was once again recognised at the Lawyer Awards 2019, where the project won the Best Collaboration Initiative Award.

Online Campaigning

For this year’s 17 Days of Activism for the Empowerment of Rural Women and their Communities campaign, we highlighted
organisations and activists working to end FGM and child marriage in rural communities. 32 organisations took part. We also used the campaign to show the impact of FGM in rural communities, using data from our research.

We used the 19 Days of Activism for Prevention of Violence Against Children and Youth campaign to launch our new short reports on Benin, CAR, Cameroon, Chad and Ghana.

We started the 16 Days of Activism campaign by launching our new Country Profile: FGM in Sudan on the International Day for the Elimination of Violence against Women. The report was well received and we were very pleased to see media coverage of it all around the world. For the rest of the campaign, we worked with US/Mali anti-FGM campaigner Kadi Doumbia to launch her new anti-FGM campaign 14+1. Mali is one of our focus countries, with a prevalence of 91.4% and no law against FGM, and we will be updating our research on it this year. Our research was used to raise awareness of FGM in Mali during the campaign.
‘Thank you 28 Too Many for your endless support all through this time.’
– Diaka Salena Koroma, Sierra Leone
Model Law Report Launch

On 8 March, International Women’s Day, we launched our new FGM Model Law. This model law is different to our other publications in that, rather than being a standard report, it is a tool for policy and decision-makers to help them implement new laws or strengthen existing ones. It is also a tool for activists to challenge current legal environments that may not be supporting their efforts to end FGM. We are working with activists and organisations to ensure that the FGM Model Law reaches influencers in countries where no anti-FGM laws currently exist as well as in countries where existing laws need strengthening, which we see this as an ongoing process.

COVID-19

As the impact of COVID-19 took hold, major events were cancelled all around the world. This included the Commission on the Status of Women (CSW) in New York, where 28 Too Many had planned three side events: ‘Model Law: Innovative Practice to Make Substantive Change’, ‘Shoulder to Shoulder: Men and boys supporting women and girls to achieve gender equality’, and ‘Changing Social Norms – Designing Culturally Sensitive Community Programmes’. We are now working to rearrange these events and exploring whether they will take place as virtual events.
in the coming months or as actual events after COVID-19 restrictions have been lifted.

In addition, we have set up a series of online workshops providing support to anti-FGM activists across Africa. These have been welcomed as people adapt to different methods of working due to COVID-19 lockdowns. As a result, our presence on social media is more important than ever. We are providing full advocacy and social media support to activists and organisations and have worked with them to address highlights of the issues that COVID-19 is raising, such as greater risks to girls as schools are closing.
Financial Information

While our income was lower this year, our cash reserves still exceed our planned operating budget. Furthermore, we have adjusted our 2020/21 budget in response to Covid-19. As can be seen from the figures below, the vast majority of our income comes from individual, voluntary donors rather than specifically solicited grants.

Incoming Resources

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<th>Apr 19–Mar 20</th>
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Expenditure

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<td>Charitable activities</td>
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<td>Total operating</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 TrustLaw for their partnership with us on the FGM Model Law research. We especially wish to thank the pro bono teams for the thousands of 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.