

# women's support project

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## WORKING AGAINST VIOLENCE AGAINST WOMEN AND CHILDREN

To: Equalities, Human Rights and Civil Justice Committee

2<sup>nd</sup> December 2024

I am writing in response to your letter of 8<sup>th</sup> November 2024, requesting comments on the non-implementation of the Female Genital Mutilation (Protection and Guidance) (Scotland) Act 2020.

### Context

Women's Support Project undertakes awareness work and training on harmful traditional practices and maintains the FGM Aware website. Although WSP is not funded to provide a FGM support service, we do respond to enquiries from women and practitioners. Our Glasgow based Rights & Choices service provides activities for migrant, refugee and asylum-seeking women who are socially isolated, and / or have experienced violence at any point. Service users include women FGM survivors.

I was a member of the Scottish Government **FGM National Action Plan Implementation Group**, which met up until early 2022. The FGM group was merged with the National Forced Marriage Network in late 2022, initially under the title of Honour Based Violence Network, and now known as the '**Addressing Violence Against Minority Ethnic Women and Girls Network**'.

### Reasons for delay

It is my understanding, based on discussion at the above groups, that the delay to developing refreshed national FGM guidance and implementing the Act has been due to the pandemic initially, and later a lack of capacity within the Equalities Team.

### Impacts of the delay, based on our experience

- In our experience it is rare for women who have experienced FGM to be anything but protective of their daughters. Women asylum seekers who have daughters at risk of FGM are concerned that protection has not been strengthened, because the risk of FGM is often part of their asylum claim.
- Awareness raising, public education and practitioner training were paused in many areas, as people wait for the updated guidance.
- Where some awareness work has continued at local level, attendance can be impacted by the belief that 'It doesn't happen here'. Updated multi-agency guidance might help local VAW Partnerships to integrate FGM work into the public protection agenda, i.e. both child and adult protection.

- Updated guidance and ongoing training opportunities for frontline practitioners is needed to strengthen responses to women and girls affected by FGM. The FGM Lead Midwife for the Alnisa service reports a 50% increase in FGM cases in 2023.
- Women who contributed to the consultation for the Bill are disappointed that the Act has not been implemented.
- Implementing the Act would help raise awareness of the harm caused by FGM, and of protective legislation in Scotland / UK. This is particularly important at a time when campaigns to reverse laws against FGM have received international media coverage, eg <https://www.thinkglobalhealth.org/article/gambia-moves-overturn-ban-female-genital-cutting>

Regards

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Manager

Women's Support Project