

**Written evidence submitted by Nimco Ali OBE and Brendan Wynne, Co-founders of *The Five Foundation, The Global Partnership To End FGM***

*Executive Summary*

1. The Five Foundation is the Global Partnership To End FGM. It was founded in 2019 by leading UK anti-FGM survivor activist Nimco Ali OBE and Brendan Wynne. Along with others including the late Efua Dorkenoo OBE the co-founders have spearheaded much of the change in the UK and globally on efforts to end FGM in the last decade, including raising national and international awareness of the issue in policy, media and through various relevant networks. The Five Foundation is uniquely positioned as a leading expert on the issue of ending FGM and how governments and foundations should prioritise getting funding to grassroots organisations working to end it, particularly on the African continent. It partners with over 50 leading organisations around the world. More information is available at [www.thefivefoundation.org](http://www.thefivefoundation.org) or [info@thefivefoundation.org](mailto:info@thefivefoundation.org).
2. Although The Five Foundation fully supports the UK Department for International Development (DfID)'s commitment to 0.7% of gross national income in official development assistance - and its major commitment to end FGM through pledging the largest single amount by any country, it strongly recommends that both the eligibility requirements of supplier applicants are revised, and that the level of funding available - particularly in relation to women and girls on the African continent - is dramatically increased for grassroots organisations, which currently have the most impact on these issues.
3. The Five Foundation recommends that the risk analysis of suppliers of its women and girls programmes is urgently reviewed so that suppliers that are not currently receiving revenue in the tens of millions are not automatically deemed "high risk". This deters many very effective potential applicants from applying, and makes flexibility and innovation far less likely to happen. Through its requirement for major decisions to be made in London rather than on the African continent it also disempowers African women, who are the best decision-makers on ending FGM in their communities.
4. The Five Foundation strongly supports DfID's world-leading commitment to supporting activism to end FGM, but urges it to have a much clearer prioritisation of what constitutes impact - and to ensure that grassroots organisations are far better able to access funding. This means funding women's funds rather than management consultancies. Such funds can then re-grant to frontline women's groups working to end FGM through a strategic movement building approach that fuels gender equality more broadly in countries affected by FGM.

*Evidence and Recommendations*

5. The Five Foundation fully supports DfID's commitment to 0.7% of gross national income in official development assistance but strongly recommends that the eligibility requirements of supplier applicants are revised. In its recent request for proposals for an

Africa-led programme to end FGM it suggested that risk could be evaluated accurately according to annual turnover.

6. In the document *ITT Volume 2: Open Procedure - Scoring Methodology and Evaluation Criteria* suggests that a "Potential Supplier who lacks the appropriate financial capacity could represent a risk to satisfactory Contract delivery. Where financial capacity is in question, the Response may be failed on this basis, irrespective of a Potential Supplier's performance in other non-financial areas". DfID suggests that "The level and type of financial risk applied to this procurement is applied as follows: Low Risk – Potential Suppliers must have a yearly turnover which equals at least 50% of the maximum Contract value as set out in the OJEU Contract Notice. Medium Risk – Potential Suppliers have a yearly turnover which is less than 50% of the maximum Contract value, but more than 20% of the maximum contract value. High Risk – Potential Suppliers with a yearly turnover which is less than 20% of the maximum Contract value." This is deeply unfair and gives an edge to large consultancy organisations that already enjoy high turnover, but who may not be the best positioned to implement programmes such as the Africa-led programme to end FGM globally. It implies that somehow they are less risky investments than smaller survivor-led frontline activist organisations on the African continent, which work effectively to end FGM every day. This bias also deters innovative solutions and newer initiatives, which may be far more impactful and cost-effective, but do not have over £10m in annual turnover.
7. The Five Foundation recommends that the level of funding that is made available - particularly in relation to women and girls on the African continent - is dramatically increased for grassroots organisations, which currently have the most impact on these issues. This would require a structural change - one where African activists are trusted to deliver change - and where London-based management consultancies are not given favourable treatment in terms of eligibility to apply for funding relating to violence against women and girls on the African continent - particularly when they often have little or lacklustre experience in effective delivery of such programmes. It's vitally important that we change the structure of how DfID funds efforts to end violence against women on the African continent since the way it does so at the moment offers very poor value for money, is inefficient and disempowers those activists leading change in their localities.
8. Through funding African work to end FGM through London-based management consultancies DfID disempowers those activists who are effectively ending it in Africa. Decisions in relation to what works to end FGM should not be made in the UK. This is enormously disempowering for African activists. It does not recognise the nuances which they are uniquely aware of - and it does not fully respond to the need for major flexibility and adaptability depending on the local context. This can manifest itself dramatically. One size does not fit all. The Five Foundation recommends that DfID ensures that funding to end FGM does not disempower grassroots activists, but rather puts them front and centre in the decision-making process of what works to end FGM and how to best fund these efforts.
9. The recent business case for the £31m contract to end FGM (reference: 8520) was inaccurate and outdated, and did not include recent best practice on what works to end

FGM. It made it close to impossible for any potential supplier to be successful if it did not adhere to the inaccurate aspects of the case, thereby limiting the potential for future work to be effective. New evidence shows that there are major concerns in relation to what happens after a community abandons FGM - and how it is very likely that change is not sustained. This is most evidence in Senegal, which has had the lion's share of investment to end FGM, but where DHS surveys show prevalence has barely changed in recent years. For adolescent girls it may have even increased. Anomalies such as these are not always evident to researchers who are not experts on the issue and who are not working on it on a day-to-day basis. When a business case has such inaccurate biases it makes it next to impossible for a response to be accurate and likely to be the most effective approach. In reality the country which is having most impact in relation to ending FGM is Kenya, where DHS surveys show prevalence has fallen from 41% for middle aged women to 11% for adolescent girls. This is due to a vibrant civil society of women activists who have worked for years in their local communities with various approaches including rescue centres and media advocacy. It does not typically use the community abandonment approach, which is more prevalent in West African countries where FGM prevalence has not decreased as significantly. The Five Foundation recommends that DfID business cases relating to nuanced issues such as FGM are not framed in a way that deters evidence-based best practice of what works locally. Instead, they should allow for innovative solutions to be offered and for the quickly evolving evidence to be better reflected in any successful applications for funding.

10. The Five Foundation concludes its submission by recommending that DfID urgently revises its approach to funding efforts to end FGM in Africa and beyond. It needs to eliminate biases relating to its understanding of "risk" and in relation to its failure to seemingly trust African women who are delivering change in their communities. It should instead pledge funding to collective donor funds which are far better able to re-grant funding as part of a far more strategic movement building approach, which does not disempower local activists, and which ensures that those leading efforts to end FGM can scale up successes accordingly as part of their broader work towards gender equality and achieving Global Goal 5. This would mean that we can truly end this extreme form of violence against women and girls in this generation and that DfID can be proud to have a meaningful role as a world leader on funding this incredibly under-resourced issue.

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