

NGO input to GREVIO

Portugal

1st thematic evaluation: Building trust by delivery support,
protection and justice

Table of Contents

Authors	1
Introduction.....	2
Part I: Changes in comprehensive and co-ordinated policies, funding and data collection in the area of violence against women and domestic violence.....	2
Article 7: Comprehensive and coordinated policies	3
Article 8: Funding.....	3
Article 11: Data collection and research.....	4
Part II: Information on the implementation of selected provisions in priority areas in the field of prevention, protection and prosecution	4
Article 12: General obligations.....	4
Article 22 – Specialist support services.....	6
CONCLUSION.....	6

Authors

Associação para o Planeamento da Família (APF): [APF](#) promotes sexual health, choices and rights based on gender equality in Portugal since 1967. Its mission is to "help people make free and responsible choices in their sexual and reproductive life". APF started working on female genital mutilation in 2000: advocating for women's and children's rights, sexual and reproductive health, and cooperation and development with the United Nations Fund for Population, other UN agencies, research institutes and European NGOs from several countries. *APF* is the Portuguese member of the End FGM European Network.

End FGM European Network (End FGM EU): [End FGM EU](#) is a European umbrella network of 39 organisations working in 16 European Union Member States to ensure a sustainable European action to end female genital mutilation in Europe and beyond. Its vision is “a world free of all forms of female genital mutilation (FGM) where women and girls are empowered and can fully enjoy their human rights”. Its mission is to be the driving force of the European movement to end all forms of FGM, joining the forces of communities and civil society organisations, and building synergies and cooperation with all relevant actors in Europe and globally.

Introduction

The present document is produced by APF in coordination with End FGM EU, in order to highlight the current situation and propose concrete recommendations in the framework of the first thematic evaluation concerning FGM in Portugal. Despite this report focusing only on this harmful practice, its aim is not to single it out in isolation, but rather to put emphasis on it while still seeing it in the *continuum* of gender-based violence against women and girls and in a holistic and comprehensive manner.

This report represents the Portuguese chapter of a wider coordinated effort of End FGM EU to engage all its members who are under GREVIO revision to present an **FGM-focused report** to bring to the experts’ attention the topic, which is too often neglected by State authorities. This project somehow stems from the Guide on the [Istanbul Convention as a tool to end female genital mutilation](#) which was produced in coordination between the Amnesty International End FGM European Campaign (the predecessor of End FGM EU) and the Council of Europe. It puts in practice the Guide’s holistic approach by considering the Istanbul Convention’s full application to FGM as a form of violence against women and girls which needs to be addressed through prevention, protection, prosecution and integrated policies. The recommendations made in this report are based on the analysis made by APF and End FGM EU following up on our first shadow report¹ and recommendations made by the GREVIO in 2019.

Part I: Changes in comprehensive and co-ordinated policies, funding and data collection in the area of violence against women and domestic violence

¹ [Shadow Report - Portugal v4 \(coe.int\)](#)

Article 7: Comprehensive and coordinated policies

From 2009 to 2017 there were 3 specific National Action Plans (NAP) on FGM. All three FGM programmes have been systematically internally and externally evaluated and overviewed by the Intersectoral Working Group, with stakeholders from Ministries and NGOs. Therefore, the Secretary of State for Gender Equality concentrated all NAPs into a global strategy divided into 3 main areas: 1. Equality between women and men; 2. Violence against women (VAW), specifically domestic violence; 3. LGBTI. Reportedly, only the NAP on trafficking of human beings remains as a separate programme. In this new framework, FGM is inserted into the second area on VAW, under a subsection on “harmful practices”. This also entails that the Intersectoral Working Group will be dismissed because its mandate will become void. One extra attempt was made to implement a similar monitoring group in 2019, but only one meeting has been organised since 2019.

The disappearance of the Working Group – coordinating actions on FGM among government departments, international and national NGOs, and community-led organisations – represents a backslide. We observe that this is not sufficient to ensure meaningful civil society scrutiny over the government programmes, due to the necessity of having a very broad expertise on all the issues included in the NAP. Which consequently leads to less effective campaigns and poor funding quality (see below).

- **We recommend that Portugal maintains the existence of an intersectoral coordinated body among governmental departments, civil society and communities, for the implementation of actions to tackle FGM.**

Article 8: Funding

Portugal put in place a specific funding opportunity - *Apoio Técnico e Financeiro ao desenvolvimento de medidas, projetos ou ações de Prevenção e Combate à Mutilação Genital Feminina* - ‘within the scope of supporting immigrant associations and Non-Governmental Organizations, in the development of projects aimed at empowering women in communities affected by FGM and preventing and combating traditional Harmful Practices’¹. It was first launched in 2018 for projects lasting 12 to 18 months with a maximum funding of €10,000. The last call opened in 2023 with a total funding of €80,000.

While this initiative is commendable for providing smaller grassroots organizations and NGOs with accessible and flexible funding opportunities, we have observed some drawbacks. Specifically, the analysis and selection process for recipients has become less rigorous over time, leading to potential misuse of funds. Consequently, only a small portion of the budget allocated for this fund is effectively reaching grassroots organizations that are actively working on sensitive issues like FGM.

- **We recommend applications for this fund to be more rigorously evaluated and new funding criteria to be adopted. This will help to ensure that the fund achieves its primary objective: sustainably supporting grassroots organisations and NGOs working to end FGM.**

Article 11: Data collection and research

When it comes to FGM there is a stark lack of data on the prevalence of persons at risk of undergoing FGM. The latest data available “[Mutilação Genital Feminina: prevalências, dinâmicas socioculturais e recomendações para a sua eliminação](#)” was presented in March 2015, based on the results of a census held in 2011, hence these numbers are more than 10 years old and are now too outdated to be trusted and used. Having up-to-date and accurate data is key to understanding the extent of the state of FGM in Portugal and will ultimately lead to better-targeted and more efficient actions, including when adopting action plans and budgeting for it.

- **We would recommend that Portugal conducts a new data collection campaign with a new and improved methodology in order to collect accurate and up-to-date numbers of FGM Survivors and girls and young women at risk.**

Part II: Information on the implementation of selected provisions in priority areas in the field of prevention, protection and prosecution

Article 12: General obligations

Portugal put in place a national campaign on [FGM](#), “*Cada Mutilação Genital Feminina rasga um futuro*”, launched in February 2024 which could be translated into “Every Female Genital Mutilation rips apart a future”

While the campaign's intention is to draw urgent attention to the severe impacts of FGM, it can be criticised for its lack of cultural sensitivity and potential to retraumatise survivors. By using strong and graphic language, the campaign risks alienating the very communities it aims to help. It might inadvertently reinforce feelings of shame and guilt among survivors, who may already be struggling with their experiences. Furthermore, such messaging can further stigmatise certain cultures, portraying them as barbaric without acknowledging the complex socio-cultural factors that perpetuate FGM. This approach can lead to resistance rather than cooperation from the communities where FGM is practiced, as they may feel attacked or misunderstood. To raise awareness about this practice, we regret that this campaign was not created and developed in collaboration with NGOs and CSOs specifically working on FGM. As a result, the campaign overlooks many critical aspects of FGM and employs language and

a general approach that are highly detrimental and retraumatising for survivors, people at risk, and affected communities, undoing years of advocacy work by the civil society sector.

For a more effective and compassionate approach, the campaign could focus on empowering survivors and communities through education and support and by emphasising positive narratives of change and resilience. Engaging with local leaders, respecting cultural contexts, and highlighting successful efforts to end FGM from within those communities can foster a more inclusive and supportive environment. This approach not only respects the dignity of survivors but also promotes sustainable change by building on existing cultural strengths.

- **We urge Portugal, in accordance with the obligations set forth in the Istanbul Convention, to cooperate with NGOs and CSOs, particularly those specialised in FGM, to build effective, meaningful, and targeted awareness-raising campaigns.**

Article 15: Training of professionals

In order to tackle FGM and be able to support those affected, it is critical to engage all professionals who may encounter survivors or people at risk to make sure they can support them with a culturally and gender-sensitive approach. In order to offer adequate services to Survivors and people at risk it is crucial to put in place continuous training for professionals to enhance their capacity to provide effective and appropriate support which will lead to sustainable and long-term impact in ending FGM and its consequences. In particular, in Portugal there is a severe lack of training for professionals and educators in the law enforcement sector despite them being frontline workers and often in touch with affected people. According to Portuguese legislation, reporting a crime to law enforcement and judicial authorities is compulsory for professionals, particularly when the victim is a minor. However, this legal obligation is often not complied with since, among other reasons, professionals (especially educators) are not aware of this obligation and fail to register the cases. Therefore, we reiterate the recommendations, calling for a strong need for more awareness raising and training for educators, so that they can better detect cases of FGM when they encounter it.

- **We strongly encourage Portugal to put in place continuous training for law enforcement professionals and all professionals working with survivors, people at risk and affected communities in a culturally and gender sensitive way.**
- **In particular, we recommend integrating FGM education into school curricula on gender equality and sexuality, establishing a rigorous national training program for teachers and child educators.**
- **Enforcing comprehensive FGM training for the Commission for Protection and for prosecutors.**

Article 22 – Specialist support services

At the moment in Portugal, there are no specific health services in place for FGM survivors despite the need for it to exist. There is no multi-disciplinary public health service in Portugal that could support FGM Survivors and deliver the healthcare they need.

- **We urge Portugal to put in place multi-disciplinary healthcare services for FGM Survivors specially in most prevalent areas (Lisbon Region), through National Health Service. The services could involve allocating hours of professionals in the main maternity hospital in Lisbon (Maternidade Alfredo da Costa) and organizing a service with a multidisciplinary team (gynecology, psychology, social services, sexology) that would operate during a period of specific hours during the week. It could start as a service that only works once a month and increase the number of hours when there starts to be more demand.**

CONCLUSION

In conclusion, APF and End FGM EU would like to call upon the Portuguese authorities to keep working towards putting an end to FGM, by taking the following measures:

- Conduct a new data collection campaign with a new and improved methodology to collect accurate and up-to-date numbers of FGM Survivors and girls and young women at risk.
- that Portugal maintains the existence of an intersectoral coordinated body among governmental departments, civil society and communities, for the implementation of actions to tackle FGM.
- Make sure funding opportunities are available to sustainably support grassroots organisations and NGOs working to end FGM with a more rigorous application evaluation system;
- Put in place training for law enforcement professionals and all professionals working with Survivors, people at risk and affected communities in a cultural and gender sensitive way;
- Enforce comprehensive FGM training for the Commission for Protection and prosecutors;
- Integrate FGM in school curricula, within modules on gender equality and sexuality;
- Promote more awareness and training for health professionals to ensure proper detection, registration and follow-up of cases of FGM;
- Ensure the meaningful involvement of civil society in policy making and implementation;



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- Put in place multi-disciplinary healthcare services for FGM Survivors specially in most prevalent areas (Lisbon Region), through National Health Service;

We thank the GREVIO for the opportunity given to civil society to provide our expertise and concrete recommendations to improve Portuguese authorities' actions to end FGM.