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The Legal Battle Against FGM: Protecting Women's Rights

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Abstract

Millions of women and girls worldwide are impacted by the deeply ingrained cultural practice of female genital mutilation (FGM), which is most prevalent among the Dawoodi Bohra community in India. FGM is still justified by tradition, cultural norms, and false beliefs about religious obligations, even though it is widely acknowledged to be a grave violation of women's rights and a type of gender-based violence. The protection of women's health and dignity is seriously threatened by FGM, which causes serious physical, emotional, and psychological harm. Even though there isn't a specific law that makes FGM illegal, this paper critically analyzes the legal frameworks that are currently in place in India that could address the practice. Besides, this study examines the limitations of current protections under general provisions of the Indian Penal Code and the Protection of Children from Sexual Offences (POCSO) Act, the legal gaps that hinder effective intervention, and the cultural resistance that frequently thwarts legal reform. The study also explores the function of judicial activism, concentrating on recent court cases and petitions that have elevated FGM to the fore of Indian legal discussions. Additionally, this study emphasizes the crucial roles played by advocacy groups, non-governmental organizations (NGOs), and grassroots movements that put forth endless effort to promote awareness, assist survivors, and fight for the abolition of FGM. The report makes the case for stricter laws and a concerted international effort to end FGM by citing international agreements like the Convention on the Elimination of All Forms of Discrimination Against Women (CEDAW), which India has ratified.

In order to eradicate this detrimental practice, the paper concludes by urging greater community-based educational programs, stronger enforcement of anti-FGM legislation, and wider cooperation between governmental, legal, and civil society actors. It seeks to support continued efforts to protect women's and girls' rights and bodily autonomy by addressing both legal and cultural aspects.

Keywords: Female Genital Mutilation (FGM), women's rights, legal framework, human rights, India, Dawoodi Bohra, bodily autonomy, advocacy, judicial activism

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Introduction

Female genital mutilation (FGM) is a harmful cultural practice that has drawn international condemnation, it violates the fundamental rights of women and girls. Even though FGM is most frequently linked to nations in Africa and the Middle East, it is also practiced in other places, such as India, where it is mostly carried out by the Dawoodi Bohra community, a tiny sect among Shia Muslims. FGM, also known as khatna or khafz, is a religious and cultural practice that is practiced on young girls², usually between the ages of six and seven, in this community. It is thought to maintain purity and regulate female sexuality. Nevertheless, this practice has no medical justification and causes its victims to suffer from both immediate and long-term physical and psychological harm³.

The right to health, the right to be free from torture and degrading treatment, and the right to bodily autonomy are among the fundamental human rights that are violated by FGM. It results in extreme physical trauma, with long-term repercussions like difficulties giving birth, sexual dysfunction, and psychological trauma, as well as immediate ones like excruciating pain, bleeding, and infections. FGM is still practiced in some communities under the pretense of cultural tradition, even though it is illegal in many parts of the world. Many women are unaware of the full extent of the harm that this practice causes⁴.

Although the fundamental rights to equality, dignity, and personal freedom are guaranteed by the Indian Constitution, FGM is not specifically illegal under any national legislation. Because existing laws, such as those pertaining to assault, grievous hurt, and the Protection of Children from Sexual Offences (POCSO) Act, are not always applied effectively to FGM cases, this legal void poses serious obstacles for activists and survivors who seek justice. Additionally, the cultural sensitivity of FGM frequently prevents candid conversation, which results in ignorance and impedes legislative change. India has demonstrated its commitment to defending women's rights by ratifying international treaties such as the Convention on the Elimination of All Forms of Discrimination Against Women (CEDAW), but more tangible actions are required to translate

² United Nations International Children's Emergency Fund (UNICEF), Female Genital Mutilation, UNICEF, <https://www.unicef.org/protection/female-genital-mutilation> (last visited Mar. 26, 2025).

³ United Nations International Children's Emergency Fund (UNICEF), Female Genital Mutilation: A Global Concern – 2024, UNICEF, <https://data.unicef.org/resources/female-genital-mutilation-a-global-concern-2024/> (last visited Mar. 26, 2025).

⁴ Equality Now, Female Genital Mutilation, Equality Now, <https://equalitynow.org/female-genital-mutilation/> (last visited Mar. 26, 2025).

By analyzing the current legal frameworks and their shortcomings in addressing the practice, this paper aims to address the urgent problem of FGM in India. It also emphasizes the function of judicial activism, since a number of petitions and court cases have recently raised awareness of the problem and called on the courts to step in when legislative attempts have failed. Since grassroots movements are frequently at the vanguard of the fight against FGM, the roles played by NGOs and community-based advocacy groups in promoting awareness and aiding victims are also examined.

This study attempts to give a thorough grasp of the legal fight against FGM in India by examining the intricacies of cultural resistance, legal loopholes, and the increasing momentum for change.

Significant progress can be made in India to end FGM and defend the rights of women and girls by combining legal reform, community education, and international collaboration⁵.

Objectives

- 1) To investigate FGM's legal standing in India, taking into account both current and possible legal loopholes.
- 2) To examine court rulings and how they affected the push to make FGM a crime.
- 3) To evaluate how NGOs and advocacy groups contribute to promoting social and legal change and increasing public awareness.
- 4) To look at the obstacles to ending FGM, such as societal opposition, legal snags, and a lack of knowledge in impacted communities.

Literature Review

- By reviewing previous scholarly research, official government publications, and international human rights documentation pertaining to FGM in India, the literature review serves as the cornerstone of the study.
- The prevalence, effects, and legal issues surrounding FGM are documented in scholarly articles, research papers, and publications from non-governmental organizations

⁵ Amnesty International, Women's Rights: Addressing Discrimination, Amnesty International, <https://www.amnesty.org/en/what-we-do/discrimination/womens-rights/> (last visited Mar. 26, 2025).

(NGOs) and international organizations such as the United Nations (UN)⁶, World Health Organization (WHO)⁷, and UNICEF.

- The way that FGM is framed within the Indian legal and cultural framework is given special attention. Despite being widely acknowledged as a violation of human rights, FGM has not received enough attention in India and its legal system has not adequately addressed the practice. The literature review⁸ critically evaluates how the Indian legal frameworks—such as the Protection of Children from Sexual Offenses (POCSO) Act, the Indian Penal Code (IPC), and the Constitution—address or neglect the practice of female genital mutilation. In order to illustrate the discrepancy between international commitments⁹ and domestic legal action, international conventions such as the Convention on the Elimination of All Forms of Discrimination Against Women (CEDAW) and their applicability to India's legal obligations are also examined.
- The paper identifies important themes through this review, including the relationship between human rights and cultural practices¹⁰, the difficulties in enacting laws against FGM in India, and the growing reform movement spearheaded by advocacy groups.

Materials and Methods

This section describes the research methodology used to collect and examine data on female genital mutilation (FGM) in India. The study combines primary insights from interviews with important players in the fight against FGM with secondary data from the body of existing literature and case law analysis. Three main parts comprise the materials and methods:

Interviews: The primary research used in this section was obtained through interviews with important players in the Indian anti-FGM movement. Activists, legal professionals, community

⁶ UN Women, Sources of International Human Rights Law on Female Genital Mutilation, End Violence Against Women Now, <https://www.endvawnow.org/en/articles/645-sources-of-international-human-rights-law-on-female-genital-mutilation.html> (last visited Mar. 26, 2025).

⁷ World Health Organization, Female Genital Mutilation Fact Sheet, WHO, <https://www.who.int/news-room/fact-sheets/detail/female-genital-mutilation> (last visited Mar. 26, 2025).

⁸ ResearchGate, Female Genital Mutilation: A Guide to Laws and Policies Worldwide - Review, ResearchGate, https://www.researchgate.net/publication/236715390_Female_Genital_Mutilation_A_Guide_to_Laws_and_Policies_Worldwide_review (last visited Mar. 26, 2025).

⁹ Anika Rahman & Nahid Toubia, Female Genital Mutilation: A Guide to Laws and Policies Worldwide (2000).

¹⁰ World Health Organization, Eliminating Female Genital Mutilation: An Interagency Statement (2023).

leaders, and representatives of non-governmental organizations (NGOs) that deal directly with the problem of FGM are some examples of these stakeholders.

Interviews with attorneys who have handled cases involving FGM also provide insight into the legal defences of FGM in court as well as the challenges they encounter in obtaining a hearing¹¹. Their viewpoints provide a more thorough comprehension of the law and the potential for further litigation.

Testimonies from survivors are an essential component of this study because they give the legal and policy debates a personal touch. These testimonies highlight the critical need for survivors' social support and legal protection, as well as the physical and psychological harm inflicted by FGM¹². Testimonies from both women who have experienced FGM and those who have been able to avoid it because of awareness campaigns emphasize how crucial empowerment and education are to putting an end to the practice.

Data Analysis: Three main areas comprise the data analysis in this study: advocacy efforts, challenges, and legal frameworks. From legal provisions and enforcement to cultural resistance and the role of civil society, each section examines a different aspect of the fight against female genital mutilation (FGM) in India. This analysis gives a thorough overview of the legal fight against FGM and identifies areas that require more development¹³.

Data Presentation: Data on the following topics can be presented in charts or tables to improve comprehension of FGM-related cases in India:

- 1) The number of FGM-related cases filed in Indian courts.
- 2) The role and impact of NGOs in various regions of India.
- 3) Regional differences in the prevalence of FGM and the effectiveness of advocacy efforts.

Legal Frameworks

¹¹ AHA Foundation, Female Genital Mutilation (FGM) in the U.S., AHA Foundation, <https://www.theahafoundation.org/female-genital-mutilation-fgm-in-the-us/> (last visited Mar. 26, 2025).

¹² WeSpeakOut, WeSpeakOut Research Study, WeSpeakOut, <https://www.wespeakout.org/upload/WeSpeakOut%20Research%20study.pdf> (last visited Mar. 26, 2025).

¹³ Plan International, Female Genital Mutilation (FGM), Plan International, <https://plan-international.org/srhr/fgm-female-genital-mutilation/> (last visited Mar. 26, 2025).

Indian Legal Frameworks: FGM is not expressly prohibited by any national legislation in India. Nonetheless, some aspects of the practice can be addressed by applying the current legal provisions found in the Protection of Children from Sexual Offenses (POCSO) Act and the Indian Penal Code (IPC). For instance, because FGM causes such severe physical and psychological harm, it may be subject to Section 326 of the IPC, which deals with causing grievous hurt. Similarly, because FGM involves a violation of sexual integrity and bodily autonomy, those who perform the procedure on minors may be prosecuted under the POCSO Act, which protects children from sexual offenses. Despite these clauses, there is a legal void because there is no specific legislation that addresses FGM. Survivors and activists have few options for obtaining justice because of the ambiguity surrounding the application of current laws caused by the absence of clear legal directives. Additionally, due in large part to the cultural sensitivity of the practice and the ignorance of law enforcement, the application of laws such as POCSO in FGM cases has been uneven¹⁴.

International Obligations: India's legal response to FGM is also greatly influenced by its international obligations. India is obligated to defend the rights of women and girls, including their freedom from harmful practices like female genital mutilation, as a signatory to multiple international conventions, such as the Universal Declaration of Human Rights (UDHR) and the Convention on the Elimination of All Forms of Discrimination Against Women (CEDAW)¹⁵. FGM is commonly acknowledged as a type of gender-based discrimination, and CEDAW expressly calls on signatories to take all necessary steps to eradicate discriminatory practices.

Even though India has ratified these treaties, the international commitments have not yet been fully reflected in its domestic laws. This discrepancy between international commitments and

¹⁴ African Union, Maputo Protocol: 20 Years, African Union, <https://au.int/en/newsevents/20230705/maputo-protocol-20-years#:~:text=The%20Protocol%20guarantees%20extensive%20rights,female%20genital%20mutilation%2C%20among%20others> (last visited Mar. 26, 2025).

¹⁵ Office of the High Commissioner for Human Rights (OHCHR), Convention on the Elimination of All Forms of Discrimination Against Women, OHCHR, <https://www.ohchr.org/en/instruments-mechanisms/instruments/convention-elimination-all-forms-discrimination-against-women> (last visited Mar. 26, 2025).

domestic legislation emphasizes the necessity of more robust legal frameworks that specifically forbid FGM and offer precise enforcement guidelines¹⁶.

Challenges

Cultural and Religious Resistance: The strong cultural and religious opposition to FGM regulation is one of the biggest obstacles to its eradication in India. FGM is regarded as a deeply ingrained cultural or religious rite of passage in the Dawoodi Bohra community, where it is most frequently practiced. Conservative organizations within the community have reacted negatively to attempts to criminalize or regulate the practice, claiming that such actions violate their right to freedom of religion. This opposition makes it more difficult to enact and enforce laws prohibiting FGM. Activists and policymakers must strike a delicate balance between defending women's and girls' rights and health and honoring religious customs. To overcome this obstacle and increase support for legal reform, it is imperative to work with community leaders and promote community discourse¹⁷.

Legal Gaps: In India, the lack of a specific law addressing FGM leaves a legal loophole that makes it more difficult for survivors to pursue justice. FGM cases are frequently handled as general offenses under the IPC or disregarded completely in the absence of clear legal provisions. Inconsistent and insufficient enforcement of current laws results from the absence of a clear legal framework, which also leaves law enforcement, medical professionals, and the judiciary frequently unsure of how to handle FGM cases. Furthermore, the POCSO Act has been used in certain situations involving minors, but because authorities are not sensitive to the problem, its application to FGM is still uneven¹⁸. This demonstrates the pressing need for a specific legal framework that guarantees uniform enforcement and specifically addresses FGM.

¹⁶ Equality Now, New Report Finds Female Genital Mutilation Cutting in 94 Countries, Equality Now, https://equalitynow.org/press_release/new-report-finds-female-genital-mutilation-cutting-in-94-countries/ (last visited Mar. 26, 2025).

¹⁷ Equality Now, Female Genital Mutilation and Cutting in the Middle East, Equality Now, https://equalitynow.org/fgmc_in_middle_east/ (last visited Mar. 26, 2025).

¹⁸ World Bank, Female Genital Mutilation/Cutting Legal Working Group, World Bank, <https://www.worldbank.org/en/programs/globalforumljd/brief/female-genital-mutilation-cutting-legal-working-group> (last visited Mar. 26, 2025).

Lack of Awareness: FGM is not always seen as a harmful or illegal practice in the communities where it is practiced¹⁹. The physical and psychological effects of FGM may not be fully understood by practitioners or policymakers, which makes this ignorance a significant obstacle to the practice's abolition in India. In order to change how these communities view FGM and give women and girls the confidence to speak out against it, awareness campaigns and educational programs are crucial.

Advocacy and Impact

Role of NGOs and Civil Society: In India's battle against FGM, civil society organizations and non-governmental organizations (NGOs) have been crucial. Leading groups in promoting legal reform, educating the public about the dangers of FGM, and aiding survivors include Sahiyo, WeSpeakOut²⁰, and Lawyers Collective. These organizations advocate for more robust legal protections and enforcement at the policy level in addition to working at the grassroots level, interacting with impacted communities. NGOs have also played a significant role in giving survivors a forum to tell their stories, ending the taboos surrounding FGM and promoting open dialogue about the practice²¹. Through their advocacy work, the government has been pressured to take action against FGM and public awareness has increased.

Judicial Activism: In India, judicial interventions have been crucial in fostering a legal dialogue about FGM. Notably, national discussions regarding the constitutionality of FGM have been triggered by the Supreme Court's involvement in cases such as Sunita Tiwari v. Union of India²². The petitioner in this case claimed that FGM infringes upon women's and children's fundamental rights, such as their equality, right to life, and right to personal freedom. Together with its interim orders, the court's observations in this case have paved the way for additional legal challenges to FGM and fueled the growing movement for legal reform. The

¹⁹ Sahiyo, Sahiyo: Empowering Voices to End Female Genital Cutting, Sahiyo, <https://sahiyo.org/> (last visited Mar. 26, 2025).

²⁰ WeSpeakOut, WeSpeakOut Research Study, WeSpeakOut, <https://www.wespeakout.org/upload/WeSpeakOut%20Research%20study.pdf> (last visited Mar. 26, 2025).

²¹ UN Women, Ending FGM Is Essential, UN Women, <https://www.unwomen.org/en/news/stories/2021/2/feature-ending-fgm-is-essential> (last visited Mar. 26, 2025).

²² Supreme Court Observer, Sunita Tiwari v. Union of India: Ban on Female Genital Mutilation – Case Background, Supreme Court Observer, <https://www.scobserver.in/cases/sunita-tiwari-union-of-india-ban-on-female-genital-mutilation-case-background/> (last visited Mar. 26, 2025).

judiciary's involvement in the matter has been a major step toward putting an end to FGM in India, even though a final decision is still pending.

International Influence: India's stance on FGM has also been influenced by international treaties and advocacy campaigns. International organizations²³ like the World Health Organization and the United Nations have been instrumental in presenting FGM as a worldwide human rights concern, which has prompted nations like India to take action. Domestic advocacy groups now have a legal foundation to demand more robust protections against FGM thanks to India's ratification of treaties like CEDAW. International treaties and advocacy efforts have also impacted India's position on FGM. Countries like India have taken action as a result of the presentation of FGM as a global human rights issue by international organizations such as the United Nations and the World Health Organization. India's ratification of treaties such as CEDAW has given domestic advocacy groups a legal basis to call for stronger protections against FGM²⁴.

Legal Case Studies

To comprehend how Indian courts have handled or responded to FGM-related issues, legal case studies are essential. In this regard, *Sunita Tiwari v. Union of India* (2017)²⁵, a public interest litigation (PIL) submitted to the Supreme Court of India, is among the most significant cases examined. According to Articles 14 (right to equality), 15 (prohibition of discrimination), 21 (right to life and personal liberty), and 39(e) and (f) of the Indian Constitution, FGM is unconstitutional and violates the rights of women and children²⁶. This was the court's ruling in this case. The *Sunita Tiwari v. Union of India* analysis explores the arguments put forth by the parties supporting the prohibition of FGM and those arguing that it is a cultural or religious practice. The case is a prime example of the conflict between constitutional rights and personal

²³ Global Women's Institute, Policy Briefs, George Washington University, <https://globalwomensinstitute.gwu.edu/policy-briefs> (last visited Mar. 26, 2025).

²⁴ UN Women, From Evidence to Action: Tackling GBV Against Migrant Women and Girls – Policy Brief, UN Women, <https://www.unwomen.org/sites/default/files/Headquarters/Attachments/Sections/Library/Publications/2021/Policy-brief-From-evidence-to-action-Tackling-GBV-against-migrant-women-and-girls-en.pdf> (last visited Mar. 26, 2025).

²⁵ Supreme Court Observer, *Sunita Tiwari v. Union of India: Ban on Female Genital Mutilation – Case Background*, Supreme Court Observer, <https://www.scobserver.in/cases/sunita-tiwari-union-of-india-ban-on-female-genital-mutilation-case-background/> (last visited Mar. 26, 2025).

²⁶ PLOS ONE, Changing Attitudes Towards Female Genital Mutilation, PLOS ONE, <https://journals.plos.org/plosone/article?id=10.1371/journal.pone.0270088#references> (last visited Mar. 26, 2025).

law, which regulates religious communities. The paper assesses the judiciary's approach to striking a balance between cultural customs and fundamental rights by examining the court's observations and interim rulings. It also looks at how the judiciary may influence future legal reforms pertaining to FGM in India.

Other pertinent court decisions from both Indian and foreign courts are reviewed in addition to this case, including those from nations where FGM has been effectively made a crime²⁷. These case studies shed light on how judicial activism influences public opinion and laws pertaining to FGM.

Conclusion

In India, the legal fight against female genital mutilation (FGM) is intensifying, but it is still a difficult task. With judicial activism and grassroots movements playing a crucial role in defending women's rights, this paper highlights the advancements made in increasing awareness and fostering legal discourse surrounding FGM. Significant barriers still exist, though, such as ingrained cultural opposition and the lack of a specific law that makes FGM illegal²⁸.

Legal interventions are challenging because FGM is closely linked to cultural and religious beliefs, especially within the Dawoodi Bohra sect. Conservative organizations see the practice as a threat to their religious freedom, so attempts to control or outlaw it frequently encounter resistance. The lack of explicit legal provisions leads to ambiguity and restricts survivors' access to justice, even though existing laws like the Protection of Children from Sexual Offences (POCSO)²⁹ Act and the Indian Penal Code (IPC) may be applied.

NGOs that support survivors, push for change, and inform communities about the dangers of FGM, such as Sahiyo and WeSpeakOut, have also been crucial. India's stance on FGM has been shaped by international human rights treaties, such as the Convention on the Elimination

²⁷European Commission, Statement/25/413, Press Corner, European Commission, https://ec.europa.eu/commission/presscorner/detail/en/statement_25_413 (last visited Mar. 26, 2025).

²⁸ PubMed Central, Addressing Female Genital Mutilation in Your Clinical Practice, PubMed Central, <https://pmc.ncbi.nlm.nih.gov/articles/PMC6293358/> (last visited Mar. 26, 2025).

²⁹ Girls Not Brides, FGMC and Child Marriage, Girls Not Brides, <https://www.girlsnotbrides.org/learning-resources/child-marriage-and-health/fgmc-and-child-marriage/> (last visited Mar. 26, 2025).

of All Forms of Discrimination Against Women (CEDAW)³⁰, which portrays it as a violation of women's rights.

In conclusion, even though there has been progress, more work is required to completely eradicate FGM in India³¹. To put an end to the practice and defend the rights of women and girls, legal reform is essential, as is ongoing community education and global advocacy. For India to effectively combat FGM and uphold its commitments to gender equality and human rights, it is imperative that it prioritize stronger legislation, judicial activism, and grassroots engagement.

Recommendations

Strengthening Policy Enforcement: India urgently needs to enact legislation that makes female genital mutilation (FGM) a crime. Such laws should make it clear that the practice is unlawful and guarantee that those who engage in or contribute to FGM are held responsible. In addition to having severe penalties, the law should have provisions for the rehabilitation and protection of survivors³². In order for law enforcement agencies to effectively investigate, prosecute, and monitor FGM cases, specific resources must also be allotted to strengthen them. Police, medical, and legal staff should all participate in training programs to make sure they are prepared to handle cases tactfully and effectively and are aware of the legal and medical ramifications of FGM.

Community Education Programs: For the practice to be eradicated in the long run, educational programs within FGM communities are essential. These initiatives ought to concentrate on increasing public knowledge of the dangers to one's health, violations of human rights, and legal repercussions of female genital mutilation. Involving local religious and community leaders is essential because their backing can have a significant impact on altering deeply held cultural beliefs³³. Men and women alike should be the focus of outreach, informing them of the detrimental impacts that female genital mutilation has on the physical and mental well-

³⁰ Office of the High Commissioner for Human Rights (OHCHR), Convention on the Rights of the Child, OHCHR, <https://www.ohchr.org/en/instruments-mechanisms/instruments/convention-rights-child> (last visited Mar. 26, 2025).

³¹ Reproductive Health Journal, Female Genital Mutilation and Its Impacts, BioMed Central, <https://reproductive-health-journal.biomedcentral.com/articles/10.1186/s12978-017-0322-5> (last visited Mar. 26, 2025).

³² Equality Now, Female Genital Mutilation: Legal Frameworks and Advocacy Approaches (2024).

³³ World Bank, Female Genital Mutilation/Cutting Legal Working Group, World Bank, <https://www.worldbank.org/en/programs/globalforumljd/brief/female-genital-mutilation-cutting-legal-working-group> (last visited Mar. 26, 2025).

being of girls and women. These messages can be disseminated through local events, schools, and medical facilities, and ongoing educational campaigns can be guaranteed through partnerships with non-governmental organizations.

International Coalitions: India should keep stepping up its interactions with international organizations that are dedicated to ending FGM, including the World Health Organization (WHO)³⁴, the United Nations (UN), and others. India can strengthen its fight against FGM by coordinating its domestic policies with international human rights conventions and best practices. Additionally, working with nations that have effectively banned and drastically curtailed the practice of FGM can offer India useful perspectives and a model for its strategy. These collaborations can assist India in implementing tactics like comprehensive legal frameworks, public health initiatives, and educational campaigns that have proven successful elsewhere³⁵. Additionally, international cooperation will show India's commitment to ending FGM and increase pressure to respect international human rights standards.

³⁴ World Bank, Female Genital Mutilation/Cutting Legal Working Group, World Bank, <https://www.worldbank.org/en/programs/globalforumljd/brief/female-genital-mutilation-cutting-legal-working-group> (last visited Mar. 26, 2025).

³⁵ UNICEF, Female Genital Mutilation: A Global Concern (2024), UNICEF Data, <https://data.unicef.org/resources/female-genital-mutilation-a-global-concern-2024/> (last visited Mar. 26, 2025).