

# **Scotland’s National Action Plan to Prevent and Eradicate Female Genital Mutilation (FGM) – Year Three Progress Report**

**“The protection of girls and women from abuse,  
and the prevention and eradication of FGM is  
the responsibility of all those in society”**

**2016 – 2020 (Year Three Progress Report)**

## Foreword

Female Genital Mutilation (FGM) is an unacceptable and illegal practice, and an extreme violation of human rights. FGM reflects deep-rooted inequality between the sexes, and constitutes a severe form of discrimination against women and girls. FGM has no health benefits, and is an extremely harmful practice that always carries devastating short and long-term health consequences for women and girls.

We continue to take forward a range of work to prevent and eradicate FGM. We are committed to preventing FGM, and this means challenging the norms and ideas that perpetrate it, raising awareness of the dangers of the practice, and sending a strong message that FGM will not be tolerated in Scotland. We also want to ensure that we are able to protect women and girls at risk, which requires guaranteeing that we are able to identify those in danger, and then implement proper protocols to provide them with robust protection. Lastly, we are committed to ensuring the provision of effective and high-quality services to FGM survivors. This includes specialised medical care through maternity services, or access to mental health support to help with the psychological side-effects that often go hand-in-hand with FGM. The Scottish Government is committed to preventing and eradicating FGM through prevention, protection and provision. This is why we have worked closely with our partners to develop and publish Scotland's National Action Plan to Prevent and Eradicate Female Genital Mutilation (FGM)<sup>1</sup>; this ambitious plan was published in February 2016, and since then we have made good progress on our objectives.

Central to our work has been a sustained and collaborative community-based approach towards tackling FGM. With that in mind, the actions and objectives set out in the National Action Plan have been taken forward under the guidance of a multi-agency FGM National Action Plan Implementation Group. By monitoring progress on an ongoing basis, we are able to give a clear picture of the widespread variety of work that is being carried out to help realise our ambitions in this area. Through this, we are also able to ensure that our activities align with the wider work to prevent and eradicate violence against women and girls that is being progressed through our Equally Safe Strategy<sup>2</sup>.

We recognise that there are no quick fixes to tackling FGM; it is a complex and hidden issue, and there is no single solution to ending it. However, since publication, alongside our partners in the statutory and third sectors, and community-based organisations, we have made good progress against all the themes of the plan; this report provides an insight into our work. I am committed to ensuring that we continue on this journey until FGM is fully eradicated from Scottish society.

Christina McKelvie  
Minister for Older People and Equalities

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<sup>1</sup> <https://www.gov.scot/publications/scotlands-national-action-plan-prevent-eradicate-fgm/>

<sup>2</sup> <https://www.gov.scot/publications/equally-safe-scotlands-strategy-prevent-eradicate-violence-against-women-girls/>

## Introduction

### What is FGM?

Female Genital Mutilation (FGM) is internationally acknowledged as an extreme violation of the human rights of women and girls. FGM includes procedures that intentionally alter or cause injury to the female genital organs for non-medical reasons. The World Health Organisation has classified the different forms of FGM into four major types. These are as follows:

- **Type 1:** Often referred to as clitoridectomy, this is the partial or total removal of the clitoris (a small, sensitive and erectile part of the female genitals), and in very rare cases only the prepuce (the fold of skin surrounding the clitoris).
- **Type 2:** Often referred to as **excision**, this is the partial or total removal of the clitoris and the labia minora (the inner folds of the vulva), with or without the excision of the labia majora (the outer folds of skin of the vulva).
- **Type 3:** Often referred to as **infibulation**, this is the narrowing of the vaginal opening through the creation of a covering seal. This seal is formed by cutting and repositioning the labia minora, or labia majora, sometimes through stitching, with or without the removal of the clitoris (clitoridectomy).
- **Type 4:** This includes all other harmful procedures to the female genitalia for non-medical purposes, e.g. pricking, piercing, incising, scraping and cauterizing the genital area.<sup>3</sup>

### Legal Framework

FGM has been illegal in Scotland since 1985, when the Prohibition of Female Circumcision Act was passed.<sup>4</sup> Since then, the Prohibition of Female Genital Mutilation (Scotland) Act was introduced in 2005<sup>5</sup>, which re-enacted the Prohibition of Female Circumcision Act 1985 and extended protections further by also making it a criminal offence to have FGM carried out either in Scotland or abroad by giving these offences extra-territorial powers. The Act also increased the maximum sentence on conviction on indictment from 5 to 14 years imprisonment

### Policy Approach

We know that legislation is only one way in which we can work to prevent and eradicate FGM; this needs to be underpinned by a wider policy approach that brings together stakeholders from the public and third sectors, and potentially affected communities. That's why we launched our National Action Plan to Prevent and Eradicate FGM on 4 February 2016. This plan includes a series of objectives, actions and activities that sit under four categories Overarching work, Prevention, Protection and Provision. The objectives set out in the plan are as follows:

- **Overarching**
  - Positive gender roles are promoted to ensure that women and girls affected by FGM are empowered to achieve their full potential.
  - Women and men have equality of opportunity, particularly with regard to access to resources.

<sup>3</sup> <https://www.who.int/news-room/fact-sheets/detail/female-genital-mutilation>

<sup>4</sup> <http://www.legislation.gov.uk/ukpga/1985/38/contents>

<sup>5</sup> <http://www.legislation.gov.uk/asp/2005/8/contents>

- **Prevention**
  - Women and girls potentially affected by FGM feel safe, respected and equal in our communities.
  - People enjoy healthy, positive relationships and understand the damaging effects that FGM has on those relationships.
  - Individuals and communities recognise the implications and are able to challenge FGM.
  - Individuals who support FGM change their attitudes and are supported to do so.
- **Protection**
  - Justice and child protection responses to FGM are robust, swift, consistent and coordinated.
  - Those who seek to, or carry out FGM are identified early and held to account by the criminal justice system.
- **Provision**
  - Women and girls who have been affected by, and who are potentially affected by FGM have access to relevant, effective, and integrated services.
  - Service providers competently identify FGM and respond effectively.

### **This Report**

The National Action Plan to Prevent and Eradicate FGM is set to run from 2016 to 2020. The aim of this report is to provide a detailed and comprehensive update on the progress that has been made under the objectives, actions and activities since the publication of the plan. We will also highlight any areas where further work is needed to drive progress, and what our next steps will be in these areas. This report will be structured under the four categories of objectives in the Action Plan.

**Overarching:**

- **Positive gender roles are promoted to ensure that women and girls affected by FGM are empowered to achieve their full potential.**
- **Women and men have equality of opportunity, particularly with regard to access to resources.**

**This section of the action plan considers the overarching elements of the work being carried out to prevent and eradicate FGM. This includes how this action plan is implemented and how FGM is embedded in other areas of national policy and guidance.**

Paramount to our work to prevent and eradicate FGM in Scotland is putting proper protocols in place to ensure that our National Action Plan is properly implemented. Following a series of multi-agency stakeholder roundtable events held over 2016, the Scottish Government established a Multi-Agency FGM National Action Plan Implementation Group to oversee progress against the actions and objectives of the plan. The roundtable events were used to discuss the membership, terms of reference, action owners and reporting structure for the Implementation Group, with a broad range of stakeholders from the statutory and third sectors, and community-based organisations.

These discussions reinforced the Scottish Government's position that the progression of actions from the plan is predicated upon all stakeholders working in partnership to achieve a set of common goals. The Implementation Group held its inaugural meeting in November 2016, and meets on a quarterly basis. Group members have a broad range of skills and experience, and are able to give practical assistance and strategic oversight to the work required to realise our ambitions in this agenda.

In order to prevent and eradicate FGM, it's important that frontline professionals have access to appropriate guidance. A multi-agency writing group, with membership from the statutory and third sectors, and community-based organisations has developed multi-agency guidance for agencies and organisations responding to, and supporting those affected by, FGM. This work recognises the need to ensure that statutory organisations equip their workforce with the necessary skills, knowledge and understanding to effectively identify and respond to FGM, identify risk, and follow local procedures for reporting child and adult protection concerns. This guidance was published in 2017 and can be viewed [here](#).

The new Female Genital Mutilation (Protection and Guidance) (Scotland) Bill was introduced to the Scottish Parliament on 29 May 2019. The bill places a duty on Scottish Ministers to give guidance relating to FGM Protection Orders, and a power to issue guidance in relation to FGM more generally. Statutory guidance will ensure that there is clarity about the responsibilities of those covered by the Bill under FGM Protection Orders, and clarity for public bodies on how to respond effectively to FGM in a consistent and collaborative way. The fact that those exercising public functions will be obliged to have regard to such guidance will better ensure that public bodies work together effectively to combat FGM.

Subsequent to the passage of the bill, there will be a full consultation carried out to inform the contents of this guidance.

The Scottish Government considers FGM to be an unacceptable and illegal practice, and an extreme violation of human rights. FGM reflects deep-rooted inequality between the sexes, and constitutes a severe form of discrimination against women and girls. Furthermore, FGM is most commonly carried out on girls between the ages of infancy and 15 years old<sup>6</sup>, making this practice one of the most severe forms of child abuse. Therefore, it's important that we have policies like the National Action Plan in place, but it's also crucial that FGM is embedded across other national policy and guidance.

Because the Scottish Government recognises FGM as an extreme form of gender-based violence, we are committed to ensuring that FGM is identified and acknowledged within the overarching work related to violence against women and girls more broadly. Therefore, we have included honour based violence, including FGM, explicitly in our Equally Safe Strategy: Scotland's Strategy to Eradicate Violence Against Women.<sup>7</sup>

Multi-agency Violence Against Women Partnership guidance, published with COSLA in August 2016, notes that every local authority area in Scotland is expected to have a multi-agency partnership in place that has strategic responsibility for working to address all forms of violence against women and girls, including FGM. To ensure these partnerships are in place, we are working closely with the Improvement Service, who coordinate a National Violence Network. Below are some case studies that highlight some examples of the FGM related work that is being carried out through these partnerships in different local authorities across the country.

### **Fife**

Fife Council have developed a practitioner's guide on FGM which is promoted to frontline staff and is available on their intranet. The guidance includes important information on the legislative framework around FGM; information on how to investigate potential cases of FGM; a list of key contacts for further guidance and support; advice on how to identify a risk of FGM; a list of the side effects of FGM; and a list and contact details of organisations that practitioners can signpost victims and potential victims to for support. Furthermore, the Fife Violence Against Women Partnership also offers training and awareness raising sessions as part of their training calendar. These sessions are stand-alone multi-agency seminars that are aimed at professionals working across services to raise awareness of FGM, including prevalence, consequences, legal aspects, and implications for practice.

### **Dundee**

Dundee Council have local multi-agency protocols in place and work closely with a number of third sector partners and community-based organisations to ensure that frontline practitioners are able to respond effectively to FGM. For example,

<sup>6</sup> <https://www.who.int/news-room/fact-sheets/detail/female-genital-mutilation>

<sup>7</sup> <https://www.gov.scot/publications/equally-safe-scotlands-strategy-prevent-eradicate-violence-against-women-girls/>

Dundee International Women's Centre, an organisation that seeks to engage, educate and empower women from diverse ethnic cultural backgrounds to help them achieve their personal goals, works with Dundee Council to provide training on harmful practices, including FGM, to a range of professionals. Furthermore, Dundee Council work with Shakti Women's Aid who take referrals of any women/children experiencing issues relating to FGM to provide one-to-one support. They take referrals from Dundee, Angus, Perth and Aberdeen. Shakti also are involved in awareness raising training sessions on harmful traditional practices, including FGM, and also provide training to local authorities on request from Social Workers and local council staff.

### **East Ayrshire**

NHS Ayrshire and Arran's gender-based violence action plan 18-21 has included FGM. The specific action is to raise awareness of FGM through a variety of mediums, including through NHS Ayrshire and Arran's intranet and awareness raising sessions; furthermore, the Adult Support and Protection Advisor has developed a briefing paper for staff. Additionally, NHS Ayrshire and Arran's Sexual Health and Blood-Bourne Virus Health Improvement Team have delivered two training sessions to tach staff from across Ayrshire about FGM. These sessions covered background information on the prevalence of FGM; the language used by parents when speaking of FGM; and empowering staff to speak to parents if they suspect they are considering have FGM performed on their daughters. These training sessions have been delivered to teachers, health visitors, and staff working within Social Work and Housing departments.

As well as embedding FGM into wider work on Violence Against Women and Girls, it's important to also ensure it is entrenched into Child Protection policy and guidance. National Child Protection Guidance is non-statutory national guidance that describes the responsibilities and expectations for all involved in protecting children in Scotland. Child Protection Guidance provides overall direction for agencies and professional disciplines regarding the consideration, assessment, planning and actions required when there are concerns that a child may be at risk of harm from abuse and neglect. The National Guidance also provides a consistent reference point for the local inter-agency Child Protection procedures which are applied when Police, Social Work or Health determine that a child may have been abused or may be at risk of significant harm. This guidance already contains advice on handling cases involving FGM, and is also currently being reviewed and refreshed for publication next year. Colleagues from the Equality Unit have had input into the sections relevant to FGM, Forced Marriage and Honour Based Violence. This revision forms part of the Scottish Government's Child Protection Improvement Programme.

**Prevention:**

- **Women and girls potentially affected by FGM feel safe, respected and equal in our communities.**
- **People enjoy healthy, positive relationships and understand the damaging effects that FGM has on those relationships.**
- **Individuals and communities recognise the implications and are able to challenge FGM.**
- **Individuals who support FGM change their attitudes and are supported to do so.**

In the Action Plan, the Scottish Government made a commitment to provide clarity of legislation and policy position on FGM in Scotland. We drafted and published a statement opposing FGM in 2015, and this was reprinted in 2017. This gives the reader information about FGM; the legislation in Scotland and the UK relating to FGM; the criminal penalties that are associated with crimes relating to FGM; and information about the help and support available for potential victims. The purpose of this statement is to allow a person who may be at risk to show it to relatives and/or family friends when travelling abroad to remind them that FGM is a serious offence in Scotland and the UK, and that there are severe penalties for anyone found guilty of an offence.

Furthermore, in Summer 2019, the Scottish Government hosted a National Summit to Prevent and Eradicate FGM. The purpose of this summit was to remind stakeholders of the Scottish Government's commitment to combatting FGM, and to give us an opportunity to engage with stakeholders on FGM policy and legislation in Scotland. The event was widely attended by our partners in the statutory and third sectors, and community-based organisations and the outcomes of discussions are being used to inform our approach going forward.

The Action Plan also included an action to ensure that investment was made into community engagement and development to enable people to recognise the implications of FGM; and to empower them to challenge the practice of FGM. This is to include all sections of potentially affected communities, including men, women and children. The Scottish Government funds a number of community-based organisations who are delivering crucial projects to support the work on preventing FGM.

Community Info Source is a community-based organisation that works with communities and individuals so that they can realise their potential and become integrated more quickly. Their focus is on minority ethnic, migrant and refugee communities; including people who are survivors of abuse, persecution, torture and trafficking. As part of their 'Challenging Violence Against Women' project, Community Info Source are funded through the Scottish Government's Equally Safe Fund for their 'Change Makers' project, which seeks to prevent FGM, and gender-based violence more widely, by working with men in potentially affected communities. Through workshops and community engagement, this project has educated men from potentially affected communities about the harmful side effects of FGM, and how it is ultimately an extreme violation of the human rights of women and girls.



Another good example is Saheliya, a charity that offers specialist mental health and well-being support for black, minority ethnic, asylum seeker, refugee and migrant women and girls in the Edinburgh and Glasgow area. Saheliya are also funded through the Equally Safe Fund for their 'Champions for Change' project. This project seeks to train minority ethnic survivors of gender-based violence to raise awareness within their communities.

We also fund Waverley Care for their My Voice project, which works with communities in Scotland affected by FGM. The project seeks to empower communities to challenge and prevent FGM while supporting the development of culturally sensitive support services for individuals affected

The Women's Support Project is a feminist voluntary organisation that works to raise awareness of the extent, causes, and effect of male violence against women, and for improved services for those affected by violence. With funding from the Scottish Government, the Women's Support Project developed a short film entitled 'Sara's Story,' which provides information on the causes and possible impacts of FGM. The film is based on real-life accounts by women survivors and is designed to raise awareness, and for use in training and public education work. You can view Sara's story [here](#).

In 2018/19 Health Scotland funded and supported a series of community engagement sessions led and coordinated by the Kenyan Women in Scotland Association across six NHS Board areas in Scotland. These events brought together local women and health staff to consider the issues important to women in the communities, and to encourage building of relationships and information sharing between them.

The Scottish Government recognises that there are other harmful traditional practices that affect women and girls across the world and we are committed to ensuring that we consider these in our ongoing work to prevent FGM. To that end, the National Action Plan contained a commitment to scope the impact and implications that elongation of labia and other practiced have on potentially affected communities, and to develop appropriate responses to prevent these practices from taking place.

As part of the consultation on the new Female Genital Mutilation (Protection and Guidance) (Scotland) Bill, a public consultation was conducted, which ran from 4 October 2018 to 18 January 2019. This consultation, among other things, sought views on whether additional protections needed to be introduced in Scotland with regard to other harmful traditional practices, specifically labia elongation and breast ironing. It also asked respondents if they had any evidence to suggest that individuals in Scotland have been subjected to these practices. The consultation analysis showed that most respondents did not know, or did not support the introduction of additional protections in relation to labia elongation or breast ironing. While there was some support for extra protections, this was largely based on the notion that these are harmful practices, rather than the perception that these were widespread practices that necessitated a specific legislative response. Furthermore, in terms of labia elongation, it is captured under the World Health Organisation's definition of type 4 FGM, it is agreed that cases could be addressed

using existing and upcoming FGM legislation. With regard to breast ironing, it should be noted that existing child protection laws would be sufficient to convict any cases of breast ironing if one were to arise in Scotland. Nevertheless, we are committed to continuous engagement with stakeholders to ensure we remain well informed on these issues.

**Protection:**

- **Justice and child protection responses to FGM are robust, swift, consistent and coordinated.**
- **Those who seek to, or carry out FGM are identified early and held to account by the criminal justice system.**

In the action plan, the Scottish Government made a commitment to ensure that legislation in place to address FGM is fit for purpose. A number of actions have been taken forward to ensure this.

Since the introduction of the Female Genital Mutilation (Scotland) Act in 2005, the Scottish Government have worked collaboratively with the UK Government to close a loophole in the 2005 Act to extend the reach of extra-territorial offences in that Act to habitual (as well as permanent) UK residents. This was achieved through means of a legislative consent motion (LCM) in the UK Parliament's Serious Crime Act 2015.<sup>8</sup>

Furthermore, the new Female Genital Mutilation (Protection and Guidance) (Scotland) Bill was introduced to the Scottish Parliament on 29 May 2019. The Bill is currently up for the consideration of the Equalities and Human Rights Committee. The Purpose of this Bill is to introduce new provisions to strengthen the existing legislative framework for the protection of women and girls from FGM. The provisions include are outlined below.

**FGM Protection Orders**

- This Bill will create a new power for courts to make Female Genital Mutilation Protection Orders. This is a civil, as opposed to criminal, mechanism that can be used to protect those at risk.
- A court will be able to make an FGM Protection Order for the purposes of: preventing or reducing the likelihood that a person, persons or class of persons are subjected to FGM; protecting a person who has already been subjected to FGM; otherwise preventing or reducing the likelihood of a FGM offence being committed.
- The Bill provides that a court can impose prohibitions, restrictions or requirements in a FGM Protection Order. This can include, for example, requiring a person to give up their passport, or restrict them from taking a protected person to a specified place.
- There are a number of ways that a FGM Protection Order can be made: by application; under other civil proceedings already before the court; and at the conclusion of criminal proceedings where there has been a conviction for a FGM offence.
- An application can be made by:
  - A person who may be at risk from being subjected to FGM;
  - A person who has been subjected to FGM;
  - Local authorities;
  - The Chief Constable of Police Scotland;
  - The Lord Advocate; Any other person, but only with the permission of the court.

<sup>8</sup> <http://www.legislation.gov.uk/ukpga/2015/9/contents/enacted>

- The court can specify the duration during which the FGM Protection Order is to have effect. The court can set different time limits for different conditions, or with regard to different people who may be subjected to the order. Once an FGM Protection Order has been made, it can be varied, discharged, or extended by the court on application by those listed above, but the court itself and also by any person who is affected by the order.
- The Bill also provides a power for the court to make interim FGM Protection Orders for those situations where there is an immediate risk of significant harm, or that the person to be protected may be taken out of the United Kingdom for FGM purposes.
- Despite this being a civil mechanism, the Bill does make it a criminal offence to breach a FGM Protection Order. This includes when a person knowingly does something which they or another person is prohibited from doing under an order, or a person knowingly hinders a person from carrying out an obligation they are required to do under an order. The penalties provided in the Bill are:
  - On summary conviction: imprisonment for a period of no longer than 12 months, a fine not exceeding the statutory maximum, or both.
  - Conviction on indictment: imprisonment for a term not exceeding five years, or a fine, or both.

### **Statutory Guidance**

- The Bill also places a duty on Scottish Ministers to give guidance relating to FGM Protection Orders, and a power to issue guidance in relation to FGM more generally.
- There is already non-statutory multi-agency guidance already in place for FGM in Scotland.
- Statutory guidance will ensure that there is clarity about the responsibilities of those covered by the Bill under FGM Protection Orders, and clarity for public bodies on how to respond effectively to FGM in a consistent and collaborative way.
- The fact that those exercising public functions will be obliged to have regard to such guidance will better ensure that public bodies work effectively and collaboratively.
- The Bill does not set out the detail of what the guidance will contain as that will be for consultation following the passage of the Bill. However, outlined below is a preliminary list of topics that we would look to cover in both sets of guidance.
- Both sets of guidance will set out the policy and legal context for work on FGM. The Guidance on Protection Orders will describe the order, set out roles and responsibilities and cover relevant matters such as application process, costs and access to legal aid. It will provide guidance on supporting and identifying victims and individuals at risk, and signpost to available support. The guidance on FGM generally will provide a comprehensive summary of the issues around FGM and set out actions for Chief Executives, Directors and senior managers to whom the guidance will apply. Both sets of guidance will be shaped through close community engagement and work with key stakeholders, utilising the expertise of members of the FGM National Implementation Group.

Law enforcement also play a key role in protecting individuals at risk of FGM. Police Scotland have developed Standard Operating Procedures on Honour Based Violence, Forced Marriage and FGM to ensure that their responses to these offences are consistent, sensitive and meet the needs of individuals and communities affected. This was published in July 2016. Police Scotland continue to partner with the Scottish Government and community-based organisations to raise awareness of FGM. Its participative strategy seeks to ensure that affected communities are aware of the law, and are reassured that the response from Police to FGM related concerns will be both sensitive and considerate. Police Scotland's Standard Operating Procedures are currently under review, and matters pertaining to FGM may become integrated into an overarching Child Protection Standard Operating Procedure where there is already a section on FGM.

In protecting people from FGM, it's important to ensure that our child protection response to cases is robust and swift. Outlined below is a summary of the actions that would be taken should a risk of FGM being performed on a child is identified.

- FGM is a form of child abuse and a cause of significant harm. Child protection procedures apply.
- All inter-agency approaches should be carried out, as far as possible, in partnership with parents/carers unless they themselves are the source of the risk. The formal mechanism for information sharing and resolving next steps is an Inter-Agency Referral Discussion (IRD); this must involve Police, Health and Social Work in consultation with Education and any other relevant professionals as/if appropriate.
- Where risk is identified, but not immediate, some areas report that they would routinely convene a child protection case discussion, share information, assess risk, and agree actions required. If ongoing risk of significant harm is identified, child protection processes apply.
- Consideration can be given at any and all stages to the need for referral to the Children's Reporter. If a hearing is called, one of the options would be a compulsory supervision order, which could restrict travel.

It should be noted that to date, there have been no FGM-related prosecutions in Scotland. However, Police and the Crown Office and Procurator Fiscal Service stand ready to take action should a case arise.

### **Provision**

- **Women and girls who have been affected by, and who are potentially affected by FGM have access to relevant, effective, and integrated services.**
- **Service providers competently identify FGM and respond effectively.**

We are committed to ensuring that women and girls who have been affected by, and who are potentially affected by, FGM have access to relevant, effective and integrated services. This includes ensuring that the frontline staff in the NHS have the necessary skills and knowledge to support victims and/or potential victims of FGM. There are a number of actions being taken forward under the National Action Plan to ensure this.

Territorial health boards in Scotland have gender-based violence leads to support development of staff capacity concerning FGM. Each board also has a clinical lead for FGM, and some boards have specialist midwives who work with pregnant women who have a history of FGM to ensure their safety and wellbeing over the course of their pregnancy and delivery. Midwives ensure that FGM is recorded in a patient's maternity records, along with any risk assessment procedures that were carried out following disclosure.

Furthermore, to ensure that health professionals in Scotland are able to respond effectively to FGM, the Chief Medical Officer and Chief Nursing Officer have issued three letters. The first of these intended to help health professionals in the NHS recognise FGM; the services that are most likely to come across the condition; and to record the diagnosis and types of FGM in clinical letters. The second sought to inform health professionals in Scotland of the additional resources available in Scotland to support the delivery of services to who have had FGM, or who are at risk of FGM. It also provides a reminder to be alert to young girls being taken out of Scotland to have FGM performed. The final letter gave guidance for service specification and standards for healthcare to prevent FGM and respond to the needs of survivors.

Moreover, NHS staff have access to information on FGM, and details of services available through their local intranet. Some NHS Boards have also developed e-learning resources to support this. NHS Scotland have also published multi-agency guidance in 2018, which contains detailed information for health staff in identifying and responding to the needs of women with FGM.

Healthcare staff in key settings should be equipped to sensitively enquire about patient experience of FGM and respond effectively to disclosures of FGM. The primary focus for this has been maternity care. Routine enquiries of FGM have been introduced in most health boards, and there is a clear pathway of care provided, which includes risk assessment and information sharing.

It's also important to recognise that victims of FGM often need mental health support to help them in dealing with mental illnesses, such as PTSD, which are common among survivors. Each NHS Board has a Transforming Psychological Trauma Training Co-ordinator working across services to support delivery of

trauma-informed care. FGM, as part of the wider spectrum of gender-based violence, is included within this,

In terms of ensuring provision of relevant, effective and integrated services. It's also important to acknowledge the crucial support and care that is provided to victims, or potential victims, of FGM by our third sector partners.

The Scottish Government funds a number of organisations, through the Equally Safe fund, that support victims of violence against women and girls. This includes several projects that specifically relate to FGM. In total, £427,500 has been funded into FGM specific projects over three financial years (2017/18 – 2019/20). Furthermore, we also fund a number of other organisations who have a heavy focus on supporting victims of Honour Based Violence more broadly. These organisations have received a total of £1,550,000 over the course of the same three financial years. Overall, this funding supports interventions aimed at preventing FGM, supporting those affected and supporting collaborative working amongst partners in the statutory and third sectors to develop understanding, and change attitudes in affected communities.

It is also important to have multi-agency sharing protocols developed and publicised locally to statutory and non-statutory services to ensure that cases of FGM are handled effectively and sensitively. These protocols have been developed in a number of health board areas. Furthermore, Child Protection Processes include provisions for information sharing between statutory bodies including Police, Health, Social Work and Education to ensure children at risk are protected.

In the Action Plan, the Scottish Government committed to ensuring consistent recording and reporting of FGM data to inform responsive and high-quality service development and monitoring of services. Although there are some processes in place currently, for example, FGM is recorded in maternity records by midwives, there is not yet a clear framework for data recording that is used nationally. This has been identified as a priority going forward.

Key to our thinking on this is that any approach to addressing data collection should be proportionate and appropriate. We would be looking to build on systems already in place, as opposed to creating an entirely new process. We understand that we need to consider who will be responsible for collecting data on FGM and why; what the data will be used to inform; and how we will implement future data collection policies to ensure they are adopted nation-wide.

We believe that the upcoming statutory guidance on FGM, that will be introduced as a result of the new Female Genital Mutilation (Protection and Guidance) Bill, will be a good opportunity to address the issue of data collection. We will look to work closely with stakeholders to inform our thinking in this area going forward.

## Overarching objectives

Objectives	Actions	Activities	Action Owners	Summary of Progress
<p><b>Positive gender roles are promoted to ensure that women and girls affected by FGM are empowered to achieve their full potential</b></p>	<p>FGM is identified within overarching prevention work on Violence Against Women and Girls</p>	<p>Review Violence Against Women and Girls Strategies and Action Plans to explicitly include actions to prevent the practice of FGM and provide services to those affected by FGM</p>	<p>Individual and multi-agency response by CPPs (Community Planning Partnerships), Integrated Joint Boards (IJBs), Police Scotland, Violence Against Women and Girls Partnerships, Child Protection Committee (CPC) Scotland, Multi-Agency Risk Assessment Committees (MARACs) and Multi-Agency Partnerships</p>	<ol style="list-style-type: none"> <li>1. Honour Based Violence, including FGM is explicitly referenced in the Equally Safe Strategy.</li> <li>2. The multi-agency Violence Against Women Partnership Guidance notes that every local authority area in Scotland is expected to have a multi-agency partnership in place that has strategic responsibility for working to address all forms of violence against women and girls, including FGM.</li> <li>3. NHS Boards have incorporated FGM into their local action plans on gender-based violence.</li> </ol>
	<p>Gender based violence, including FGM, is recognised as a public health issue</p>	<p>Public health strategies and services involve partner agencies and community organisations to raise awareness of the right of all women and children to be free of FGM</p>	<p>All Statutory and Third Sector Organisations</p>	<ol style="list-style-type: none"> <li>4. FGM, as part of the overall narrative on gender-based violence, is included in the multi-agency Violence Prevention Framework developed by the Scottish Public Health Network, which reports to Scottish Directors of Public Health Group.</li> </ol>



Objectives	Actions	Activities	Action Owners	Summary of Progress
<p><b>Women and men have equality of opportunity, particularly with regard to access to resources</b></p>	<p>Public sector agencies understand and fulfil their general and specific duties as set out in the Equality Act 2010, and include FGM within gender-based violence strategies</p>	<p>Review gender-based violence strategies and action plans to explicitly include access to resources to enable public sector organisations to understand their duties to prevent FGM and provide services to those affected by FGM</p>	<p>All statutory organisations</p>	<ol style="list-style-type: none"> <li>5. A multi-agency writing group, with membership from the statutory and third sectors, and community based organisations developed multi-agency guidance for organisations responding to, and supporting those affected by FGM.</li> <li>6. The National Child Protection Guidance provides a national framework within which agencies and practitioners at a local level can understand and agree processes for working together to support, promote and safeguard the wellbeing of all children; the guidance includes a section on FGM.</li> <li>7. The new Female Genital Mutilation (Protection and Guidance) (Scotland) Bill introduced a provision for Ministers to issue statutory guidance on FGM. Subject to Parliament passing the Bill, a full consultation will be conducted to inform the contents of this guidance.</li> <li>8. To ensure that health professionals in Scotland are able to respond effectively to FGM, the Chief Medical Officer and Chief Nursing Officer have issued three letters since 2014 giving NHS staff advice on FGM, the services most likely to come across it, and the process for recording cases of FGM.</li> <li>9. Education Scotland have developed a National Improvement Hub, which provides information and support to practitioners. The Hub has a specific page on FGM.</li> <li>10. Police Scotland have developed Standard Operating Procedures on Honour Based Violence, Forced Marriage and FGM to ensure that their response to FGM is consistent, sensitive and meets the needs of individuals and communities affected.</li> </ol>

## Prevention Objectives

Objectives	Actions	Activities	Action Owners	Summary of Progress
<p><b>Women and girls potentially affected by FGM feel safe, respected and equal in our communities</b></p>	<p>Provide clarity of legislation and policy position on FGM in Scotland</p>	<p>Provide FGM Statement to raise awareness around holiday times to prevent FGM and to be included in Police Scotland initiatives at airports and ports</p>	<p>Scottish Government, statutory and non-statutory organisations including Education, Scottish Airports and Ports, Police Scotland</p>	<p>11. The Scottish Government has printed a statement opposing FGM to be used by a person at risk who can show it to relatives and/or family friends when abroad to remind them that FGM is a serious offence, with serious penalties, in Scotland.</p> <p>12. UK Border Force, in collaboration with Police Scotland, carried out Operation Limelight in Scottish Airports in Summer 2019. This project sought to raise awareness of FGM and detect any potential cases of FGM.</p> <p>13. Police Scotland’s Child Protection Policy team held awareness raising events through December 2018 and January 2019 for Border Force staff and Police Scotland Border Policing Command at both Edinburgh and Glasgow Airports.</p>

Objectives	Actions	Activities	Action Owners	Summary of Progress
	Implement an FGM prevention plan to prevent harm, and support women and girls at risk	All partners to engage with multi-agency working groups and committees, nationally and at a local authority level	Individual and multi-agency responses by CPPs (Community Planning Partnerships), Integrated Joint Boards (IJBs), Police Scotland, Violence Against Women Partnerships, Child Protection Committee Scotland, Multi-Agency Risk Assessment Committees (MARACs) and Multi-Agency Partnerships (MAPs)	<p>14. The Scottish Government Established the FGM National Action Plan Implementation Group, which oversees the implementation of the Action Plan. The group is made up of members from the statutory and third sectors, and community based organisations.</p> <p>15. Police Scotland operate a Child Protection Strategic Group, which is attended by representatives from the Scottish Government who have responsibility for FGM Policy.</p> <p>16. See no. 2</p>
		Police, with partner agencies, will coordinate local and national media campaigns to raise awareness of emerging forms of abuse	Police Scotland	<p>17. See no. 11</p> <p>18. Police Scotland participate in multi-agency events during 16 Days of Action, and Zero Tolerance Day. Police Scotland currently remain an active participant in the 16 Days of Action Campaign for late 2019</p>

Objectives	Actions	Activities	Action Owners	Summary of Progress
		Police Scotland, with partner agencies, will implement prevention strategies to influence social attitudes and reduce vulnerability	Police Scotland	19. See no. 10
		Police Scotland will review national FGM training to ensure it provides its frontline staff with the skills they need, and enabling multi-agency training.	Police Scotland, other statutory agencies, third sector agencies	20. See no. 10

Objectives	Actions	Activities	Action Owners	Summary of Progress
<p><b>People enjoy healthy, positive relationships and understand the damaging effects that FGM has on those relationships</b></p>	<p>Provide information about FGM and gender equality and children's rights</p>	<p>Raise awareness of FGM and the services available, and development of all communities including young people, men, religious leaders and others, recently arrived migrants, asylum seekers and refugees</p>	<p>Scottish Government, third sector and statutory agencies</p>	<p>21. See no. 5 to no. 10</p> <p>22. Community Info Source are funded through the Equally Safe Fund for their Champions for Change project, which seeks to combat Female Genital Mutilation by working with men in potentially affected communities.</p> <p>23. Saheliya are funded through the Equally Safe Fund for their Champions for Change project, which trains minority ethnic survivors of gender-based violence to raise awareness in their communities.</p> <p>24. Waverley Care are funded through the Equally Safe Fund for their My Voice project, which works with communities in Scotland affected by FGM. The project seeks to empower communities to challenge and prevent FGM while supporting the development of culturally sensitive support services for individuals affected.</p> <p>25. With funding from the Scottish Government, the Women's Support Project developed a short film entitled 'Sara's Story' which provides information on the causes and possible impacts of Female Genital Mutilation. The film is based on real-life accounts by survivors and is designed to raise awareness, and for use in training and public education.</p> <p>26. The Women's Support Project also maintain the FGM Aware Website, which provides information about FGM and resources for training and public education.</p>

Objectives	Actions	Activities	Action Owners	Summary of Progress
		Education Scotland will review, update and develop learning resources that can be used in the classroom in an age appropriate manner	Education Scotland, NHS Health Scotland	27. See no. 9
		Make available, up-to-date factual information on the impact of FGM on the health and wellbeing of the affected individuals	NHS Boards, third sector organisations	28. See no. 25 and no. 26 29. Staff at NHS Scotland have access to guidance on the health impact of FGM through their local intranet sites. Some NHS Boards have developed e-learning resources to support this.

Objectives	Actions	Activities	Action Owners	Summary of Progress
		Scope the impact and implications that elongation of labia and other practices have on potentially affected communities in Scotland, and develop appropriate responses	Scottish Government, third sector organisations, NHS Boards	30. As part of the consultation on the new Female Genital Mutilation (Protection and Guidance) (Scotland) Bill, a public consultation was conducted, which ran from 4 October 2018 to 18 January 2019. This consultation, among other things, sought stakeholder views on whether they thought additional protections needed to be introduced in Scotland in respect of the practice of vaginal/labia elongation. It also asked if stakeholders had any evidence to suggest that individuals in Scotland have been subjected to this practice. The consultation analysis showed that most respondents did not know, or did not support the introduction of additional protections in relation to vaginal elongation. While there was some support for protections here, this was largely based on the principle that this is a harmful practice, rather than the perception that this was a widespread practice that necessitated a specific legislative response. Furthermore, given that vaginal/labia elongation is captured under the World Health Organisation's definition of type 4 FGM, it is agreed that cases could be addressed under existing and upcoming FGM legislation. Nevertheless, we are committed to continuous engagement with stakeholders on this issue to ensure we remain well informed on the issue.

<b>Objectives</b>	<b>Actions</b>	<b>Activities</b>	<b>Action Owners</b>	<b>Summary of Progress</b>
<p><b>Individuals and communities recognise the implications and are able to challenge FGM</b></p>	<p>Communities potentially affected by FGM are supported to identify and analyse common issues within affected communities, and develop strategies to challenge behaviour and influence change in communities, service provision, and policy making</p>	<p>Investment made in community engagement and development to enable the recognition of the implications of FGM and are able and empowered to challenge the practice of FGM. This is to include all sections of the potentially affected communities, including men, women and children.</p>	<p>Scottish Government and other funders</p>	<p>31. See no. 22 to no. 26</p>



Objectives	Actions	Activities	Action Owners	Summary of Progress
		<p>Agencies and organisations should publish and maintain online information and resources, e.g. onescotland.org and Scottish Government webpages and FGM Aware, NSPCC Helpline, Scottish Women's Aid, the Scottish Domestic Abuse Helpline, the free app called Petals</p>	<p>Scottish Government and all partners in the statutory and third sectors</p>	<p>32. Scottish Government - <a href="https://www.onescotland.org">OneScotland.org</a> – <a href="#">Female Genital Mutilation page</a>  33. Women's Support Project - <a href="https://www.fgmaware.org">FGMaware.org</a>  34. Education Scotland - <a href="#">National Improvement Hub, FGM Page</a>  35. National Society for the Prevention of Cruelty to Children – <a href="#">FGM information page</a></p>
<p><b>Individuals who support FGM change their attitudes and behaviours and are supported to do so</b></p>	<p>Statutory Services work with partner agencies and community organisations to raise awareness of the right of all women and children to be free from FGM</p>	<p>Investment to be made in community-based engagement and development with all members of the potentially affected communities, including men, women, children and young people to change attitudes and behaviour</p>	<p>Scottish Government and other funders</p>	<p>36. See no. 22 and no. 23  37. In 2018/19 Health Scotland funded and supported a series of community engagement sessions led and co-ordinated by KWISA across six NHS Board areas in Scotland. These events brought together local women and health staff to consider the issues important to women in the communities and to encourage building of relationships and sharing of information between them. There will be a full report from the sessions and recommendations for future action.</p>

## Protection Objectives

Objectives	Actions	Activities	Action Owners	Summary of Progress
<b>Justice and child protection responses to FGM are robust, swift,</b>	Police to ensure that they respond sensitively to concerns raised by professionals and others	To develop awareness of, and access to the guidance for police on how to respond to FGM	Police Scotland	38. See no. 10

Objectives	Actions	Activities	Action Owners	Summary of Progress
<p><b>consistent and coordinated</b></p>	<p>Statutory agencies respond appropriately to children at risk of FGM</p>	<p>Children affected by FGM have a child's plan</p>	<p>CPP, IJBs and Social Work Scotland, Child Protection Committee Scotland</p>	<p>39. (Note: No specific reference to a 'child's plan' but below is a summary of how Social Work would respond to a case of FGM. This may differ from region to region, but this is the general standard approach as provided by Social Work Scotland)</p> <ul style="list-style-type: none"> <li>a. FGM is a form of child abuse and a cause of significant harm. Child protection procedures apply.</li> <li>b. All inter-agency approaches should be carried out, as far as possible, in partnership with parents/carers unless they themselves are the source of the risk. The formal mechanism for information sharing and resolving next steps is an Inter-Agency Referral Discussion (IRD); this must involve Police, Health and Social Work in consultation with Education and any other relevant professionals as/if appropriate.</li> <li>c. Where risk is identified, but not immediate, some areas report that they would routinely convene a child protection case discussion, share information, assess risk, and agree actions required. If ongoing risk of significant harm is identified, child protection processes apply.</li> <li>d. Consideration can be given at any and all stages to the need for referral to the Children's Reporter. If a hearing is called, one of the options would be a compulsory supervision order, which could restrict travel.</li> </ul>

Objectives	Actions	Activities	Action Owners	Summary of Progress
	Female Genital Mutilation should always be seen as a cause of significant harm, and also seen in the context of GIRFEC or local inter-agency child or adult protection procedures	Local procedures, guidelines and communication strategies should be in place to ensure a coordinated response from all agencies and highlight the issue for all staff that may come into contact with women and children who may be at risk from or affected by FGM in partnership with parents/carers where appropriate	CPP, IJBs and Social Work Scotland, Child Protection Committee Scotland and Adult Support and Protection (ASPC) conveners	40. See no. 39

Objectives	Actions	Activities	Action Owners	Summary of Progress
<p><b>Those who seek to, or carry out FGM are identified early and held to account by the criminal justice system</b></p>	<p>Ensure legislation to address FGM in Scotland is fit for purpose</p>	<p>Scottish Government to continue to engage with potentially affected communities and other relevant stakeholders to consider the impact of any further legislation</p>	<p>Scottish Government, Crown Office and Procurator Fiscal Service (COPFS), statutory organisations, third sector organisations</p>	<p>41. The Scottish Government introduced to Parliament the Female Genital Mutilation (Protection and Guidance) (Scotland) Bill on 29 May 2019, which introduces new provisions to strengthen the existing legislative framework for the protection of women and girls from FGM. As part of the development of this Bill, we ran a public consultation from the 4<sup>th</sup> of October 2018 to the 18<sup>th</sup> of January 2019, which sought views on the proposed provisions. Furthermore, we hosted a National Summit for Preventing and Eradicating FGM on 11 July 2019, which brought together stakeholders to discuss the new legislation, as well as FGM policy more widely.</p>
		<p>Scottish Government to liaise with UK Government to ensure efficacy of existing legislation</p>	<p>Scottish Government, COPFS</p>	<p>42. Officials are regularly engaging with the UK Home Office to discuss policies and legislation related to FGM. We are also involved in internal cross-government stakeholder groups.</p>
		<p>Assess the numbers being prosecuted for performing, aiding and abetting FGM following investigations by Police Scotland</p>	<p>COPFS, Police Scotland</p>	<p>43. There have been no FGM related prosecutions in Scotland.</p>

Objectives	Actions	Activities	Action Owners	Summary of Progress
		Consider the existing legislation in relation to elongation and other practices, and cosmetic genital piercings	Scottish Government, Police Scotland, COPFS, and other relevant statutory agencies	<p>44. Stakeholder views on whether additional legislative provisions needed to be made with regard to the practice of vaginal elongation were sought as part of the consultation on the new FGM Bill. The analysis showed that stakeholders did not have any evidence to suggest that this practice is widespread in Scotland, and the consensus was that further legislation would not be required. It was also agreed that vaginal elongation could be prosecuted under existing and future FGM legislation, and also under child protection legislation.</p> <p>45. The consultation also sought views on cosmetic genital piercings so we could develop our policy in this area. Genital piercings are not prohibited in Scotland, we expect the highest professional standards from all those performing cosmetic procedures.</p>
	Develop policy, procedure and learning from investigations to ensure consistent police standards are applied across Scotland	Establish an effective mechanism to review investigations and ensure adherence to national standards for prevention FGM and management of FGM Survivors	Police Scotland	<p>46. See no. 10</p> <p>47. Local mechanisms are in place, or are being developed for the multi-agency review of IRDs. Internally, Police Scotland holds a Child Protection Detective Inspectors' Forum, where learning would be highlighted and discussed.</p>

Objectives	Actions	Activities	Action Owners	Summary of Progress
		Establish a nationally accessible platform for Police Scotland to identify good practice and learning outcomes from previous investigations	Police Scotland	48. Police Scotland has Organisational Learning and Development processes in place across public protection. This is also a consideration for Detective Inspector Forums and the Child Protection Strategic Group.
		Develop and implement a communication and engagement plan in order to facilitate partner engagement and support for the delivery of national Child Protection processes	Statutory and third sector organisations	49. See no. 14 50. The new Female Genital Mutilation (Protection and Guidance) (Scotland) Bill introduces a provision for Ministers to issue Statutory Guidance on FGM; anyone exercising public functions in Scotland will be obliged to have regard to this guidance. Subject to Parliament passing the Bill, a full consultation will be conducted to inform the contents of the guidance. This Bill also is supported by a comms plan, which seeks to raise awareness of the new legislation, and of existing provisions to protect and support women who are victims of FGM.

Objectives	Actions	Activities	Action Owners	Summary of Progress
	Through thorough investigations and development of FGM intelligence strategy, identify and detect perpetrators	Work with statutory and third sector partners to agree thresholds for exchanging personal information, initiating investigations, ownership, and deployment of Police Scotland Public Protection Unit resources	Police Scotland	51. Information sharing protocols are embedded within local multi-agency Child Protection Procedures, including through IRD processes and reviews.
		Monitor impact of gender based hate crime, taking care not to stigmatise individual communities	Police Scotland	52. On 14 November 2018, the Scottish Government launched its 14 week consultation: One Scotland: Hate Has No Home Here, which sought views on the proposals for a new hate crime bill following recommendations made by Lord Bracadale's independent review into hate crime. On June 27, we published the consultation analysis report and the responses will be considered as we develop our consolidated hate crime legislation to be introduced during the current parliament session and ensure it is fit for 21 <sup>st</sup> century Scotland.



## Provision Objectives

Objectives	Actions	Activities	Action Owners	Summary of Progress
<p><b>Women and girls who have been affected by, and who are potentially affected by, FGM have access to relevant, effective and integrated services</b></p>	<p>Delivery of coordinated and consistent services via a multi-agency response to those affected, or who may be affected, by FGM</p>	<p>Regular multi-agency meetings to exchange information and good practice about FGM locally and with other regions in Scotland</p>	<p>Multi-agency response by CPPs (Community Planning Partnerships), Integrated Joint Boards (IJBs), Police Scotland and Violence Against Women Partnerships Child Protection Committee Scotland, Multi-Agency Risk Assessment Committees (MARACs) and Multi-Agency Partnerships (MAPs) and other statutory and third sector agencies</p>	<p>53. See no. 2 and no. 14</p>

Objectives	Actions	Activities	Action Owners	Summary of Progress
		All statutory agencies have at least one named professional with expertise on FGM in addition to the lead officer, where they are different individuals	All statutory agencies	54. Territorial health boards have gender based violence leads to support development of staff capacity concerning FGM. Each board has a clinical lead for FGM and two have specific specialist midwives for FGM. 55. Police Scotland has a national Child Protection Policy Detective Chief Inspector as a single point of contact.
	Consistent recording and reporting of FGM data to inform responsive and high quality service development and monitoring of services	Demonstrate improved data capture of FGM <ul style="list-style-type: none"> <li>• Recording</li> <li>• Reporting</li> <li>• Risk Assessment</li> <li>• Referrals / Monitoring</li> <li>• Information sharing</li> </ul>	All statutory agencies	56. FGM is recorded in maternity records, along with risk assessment processes undertaken following disclosure 57. Some processes are included in local IRD and iVPD processes. 58. Data recording has been identified as a priority going forward. Colleagues in the Equality Unit are currently engaging with colleagues in Health to begin to shape our thinking in this area.
		Multi-agency information sharing protocol developed and publicised locally to statutory and non-statutory sectors	All statutory agencies	59. These protocols have been developed in a number of health board areas. Furthermore, Child Protection Processes include provisions for information sharing between statutory bodies, including Police, Health, Social Work and Education to ensure that children at risk are protected.

Objectives	Actions	Activities	Action Owners	Summary of Progress
	Each NHS Board has a clear protocol and a referral pathway to ensure a coordinated and comprehensive health and social care service, including generalist and specialist services, are available and accessible informed by the local need	Provide information to healthcare staff, including those in general practice and community clinics (paediatrics, genito urinary clinics, mental health, etc.) to enable them to access up-to-date information about the range of health and other local and national statutory and voluntary sector services that offer support to survivors of FGM	NHS Boards, IJBs	60. See no. 8
		Healthcare workers and other professionals should provide relevant information to survivors of FGM about support services and how to access them	NHS Boards, CPPs, IJBs, third sector, university and student college welfare	61. NHS staff have access to information on FGM and details of services through their local intranet. Some NHS Boards have also developed e-learning resources to support this. This supports staff to provide information on services available to FGM survivors.

Objectives	Actions	Activities	Action Owners	Summary of Progress
		Individuals who experience trauma as a result of FGM should receive access to trauma informed mental health services	NHS Boards, IJBs	62. Each NHS Health Boards has a Transforming Psychological Trauma Training Co-ordinator working across services to support delivery of trauma-informed care. FGM, as part of the wider spectrum of gender-based violence, is included within this.
	Through partnership working, improve Police Scotland's response to FGM and increase opportunity for early and effective interventions in respect of victims and perpetrators	Police Scotland to work collaboratively with partners to create national processes for the submission of intelligence on FGM	Police Scotland	63. Police Scotland work is ongoing on the Partners Intelligence Portal, which is a partners' intelligence submission portal.
Improve the reporting methods by third party reporting for those affected by FGM		Police Scotland, all statutory agencies, third sector organisations	64. Police Scotland continue to engage with communities to raise awareness and encourage reporting.	

Objectives	Actions	Activities	Action Owners	Summary of Progress
		Nationally collate the number of child concern referrals/Inter-Agency Discussions (IRDs) received by Police Scotland for FGM, and maintain a national FGM register to provide operational coordination and overall assessment of FGM prevalence across Scotland	Police Scotland, Child and Adult Protection Committees, CPC, ASPC Scotland, MARACs and MAPs	65. This action has not been progressed to date due to other priorities. Officials will explore this further with Police Scotland.
<b>Service providers competently identify FGM and respond effectively</b>	All statutory organisations equip their workforce with the necessary skills, knowledge and understanding to	To develop multi-agency national guidance for front-line staff and their organisations to address FGM in Scotland	NHS Health Scotland, Police Scotland, local authorities, CPPS, higher educational institutions and all relevant third sector organisations	66. NHS Scotland published multi-agency guidance in 2018. This contains detailed guidance for health staff in identifying and responding to the needs of FGM survivors.

Objectives	Actions	Activities	Action Owners	Summary of Progress
	effectively identify and respond to FGM, identify risk and follow local procedures for reporting child and adult protection concerns	All statutory agencies will develop a comprehensive suite of guidance documents to ensure all staff are confident and competent at identifying and responding appropriately to FGM	All statutory agencies and higher educational institutions	67. See no. 5 to no. 10 68. NHS Staff have access to information on FGM and details of services through their local intranet. Some NHS Boards have also developed e-learning resources to support this. 69. Police Scotland have information on FGM on their intranet.
		Healthcare staff in key settings should be equipped to sensitively enquire about patient experience of FGM and to respond effectively to disclosures of FGM. For example, assess risk and take appropriate actions	NHS Boards, NHS Health Scotland and IJBs	70. The primary focus for this has been maternity care. Routine enquiry of FGM has been introduced in most health boards and there is a clear pathway of care provided which includes risk assessment and information sharing. Local NHS Boards have provided training for midwives. In NHS Lothian and NHS Greater Glasgow and Clyde there are also specialist services available within maternity care.

Objectives	Actions	Activities	Action Owners	Summary of Progress
		To develop and maintain FGM educational materials and resources for teachers to support children, parents/carers and other networks to include annual safeguarding update	Education Scotland	71. See no. 9

Objectives	Actions	Activities	Action Owners	Summary of Progress
		<p>Each Child Protection Committee and Adult Protection Committee should have an inter-agency learning and development strategy to reflect the training needs of the multi-agency workforce, with specific reference to the role of the Named Person and lead professional in identifying and responding to women and children at risk of, or affected by FGM</p>	<p>Individual and multi-agency response by CPPs (Community Planning Partnerships), Integrated Joint Boards (IJBs) and Violence Against Women Partnerships, Child Protection Committee (CPC) forum, and Multi-Agency Partnerships (MAPs), Social Work Scotland, Scottish Child Protection Committee Chair Forum</p>	<p>72. There is no clear picture of the achievements that have been made against this activity. Scottish Government colleagues will seek to address this moving forward.</p>





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