

Scotland’s National Action Plan to Prevent and Eradicate Female Genital Mutilation (FGM)

**“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 One Update Report)

October 2017



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Riaghaltas na h-Alba
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Foreword

Female Genital Mutilation (FGM) is an unacceptable and illegal practice; it reflects deep-rooted inequality between the sexes, and constitutes an extreme form of discrimination against women and girls. This practice is an extreme manifestation of the imbalance of power that for too many women and girls is their everyday life experience.

We have already taken forward a range of work to tackle FGM. We want to ensure that what we do protects those at risk from harm and delivers services to those who have been affected by the practice. We want to make sure that what we do is informed by cooperation and a collective will to bring about change. That is why the Scottish Government, has worked so closely with our partners to develop and publish Scotland's National Action Plan to Prevent and Eradicate Female Genital Mutilation (FGM).

This plan, which was published on 04 February 2016 and runs until 2020, sets out an agreed range of actions and associated activities to be taken forward by the Scottish Government and its partners in communities, the third sector and public sector to prevent and ultimately eradicate FGM. Whilst publication of the plan represented the culmination of a significant piece of work it was by no means the endpoint in our journey to tackle FGM.

With that in mind the actions and objectives set out in the National Action Plan are being 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 sharp focus to the practical approach we can take to realise our ambitions in this area and to make sure that this work aligns with wider work to prevent and eradicate violence against women and girls being progressed through Equally Safe.

Our collaborative approach places communities and individuals affected by FGM at the heart of work to tackle it. It has been informed by listening to those people who are best placed to bring about the significant, cultural and attitudinal changes required and who are often best placed to advise on the most effective interventions. It is only by coming together and by listening to people's needs that we can be confident that what we are doing is effective in both keeping people safe and in holding perpetrators to account for their actions.

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, along with our partners, we have been able to make progress against all of the themes of the plan. This progress has been described in more detail on pages 8 – 16 of this update report.

This report provides an insight into our initial work to deliver on the actions and objectives of our plan. I am committed to ensuring that as we go forward together, all we do helps to hasten the day that FGM is consigned to history.



Angela Constance
Cabinet Secretary for Communities Social Security and Equalities
October 2017

INTRODUCTION

FGM is internationally considered a form of violence against women and girls and a violation of their human rights. It is an extremely harmful practice with devastating short and long-term health consequences for girls and women and has been unlawful in Scotland since 1985.

The purpose of the National Action Plan is to foster an environment of prevention in Scotland and to improve the welfare and quality of life of FGM survivors, with a focus on the linked areas of prevention, protecting girls at risk of FGM; and provision of appropriate support and sensitive services for survivors of FGM.

Our approach to tackling FGM is aligned with the overarching priorities of **Equally Safe, Scotland's strategy to tackle all forms of violence against women and girls**¹, including FGM. This strategy recognises that because of systemic, deep rooted gender inequality, women and girls experience violence and abuse because of their gender and because they continue to occupy a subordinate position within society in relation to men. The Equally Safe draft delivery plan, contains specific commitments to tackle FGM.

Therefore this update should be viewed as linking with the objectives of the strategy as set out in the table below:

Positive gender roles are promoted	Positive gender roles are promoted Women and girls are safe, respected and equal in our communities
People enjoy healthy, positive relationships and children develop an understanding of safe, healthy, and positive relationships from an early age	Individuals and communities recognise and challenge violent and abusive behaviour
Women and men have equal access to power and resources	Justice responses are robust, swift, consistent and coordinated
Women, children and young people access relevant, effective and integrated services	Men who carry out violence against women and girls are identified early and held to account by the justice system
Service providers competently identify violence against women and girls, and respond effectively to women, children and young people affected	Men who carry out violence against women and girls change their behaviour, and are supported to do so
Women, children and young people's voices are heard and their rights respected	

¹ <http://www.gov.scot/Publications/2016/03/7926>

Implementation

Following a series of multi-stakeholder round table 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 statutory and third sector, and community based organisations.

These discussions reinforced the Scottish Government's position that 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 has met on a quarterly basis over the course of 2017. 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. It is this inclusive, partnership based approach that will allow us to progress the full range of actions and objectives set out in the plan.

To support this action plan investment of over £226,000 for the period 2016-2017 was made to progress actions. Further investment of over of £270,000 has been made for the 2017-2018. This funding supports interventions aimed at preventing FGM, supporting those affected, supporting collaborative working amongst partners in the statutory and third sectors to develop understanding and change attitudes in affected communities. This funding aligns directly with the objective under the theme of Prevention which states - Individuals and communities recognise the implications and are able to challenge FGM. It demonstrates clearly the Scottish Government's on-going commitment to increasing capacity in affected communities to challenge the practice.

Guidance

A Multi Agency Writing Group, with membership from the statutory, third sector 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. The Guidance will be published in 2017 and supports the objective under Provision - Service providers competently identify FGM, and respond effectively.

DELIVERY AGAINST THE THEMES OF THE PLAN

The Action Plan, developed in partnership with a range of agencies and organisations as set out in the table below, is grouped under four themes – **Overarching, Prevention, Protection and Provision**. The actions and activities of the plan are intended to deliver against those themes.

Police Scotland		Violence Against Women Partnerships
Royal College of Midwives	Social Work Scotland	Community Based Organisations
Scottish Government	NHS Scotland	Adult Protection
Crown Office and Procurator Fiscal Service		Education Scotland

MONITORING PROGRESS

Through the life of the plan Scottish Government will receive updates from agencies and organisations in relation to their delivery against actions and the outcomes within the plan.

The narrative on pages 6 to 14 sets out the main highlights under the themes of the plan. The table attached as Annex A provides updates against objectives and actions and forms part of this year one update.

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.**

These overarching objectives align with Priority 1 and 2 of the Equally Safe delivery plan which was consulted upon over the period 23 March 2017 to 30 June 2017². Responses to that consultation are currently being considered.

Related work includes the development, of Multi Agency Practice Guidance for publication in 2017. The guidance will include best practice for agencies and organisations responding to FGM to ensure access to resources. As part of the Equally Safe Capacity and Capability Workstream the multi-agency Violence Against Women Partnership Guidance that was published by CoSLA and the Scottish Government 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 VAWG at a local level, including FGM.

The Scottish Government has funded the development and wide scale distribution of a range of training and awareness raising materials in relation to FGM. A range of community based organisations, also funded by the Scottish Government, are carrying out ongoing awareness raising to highlight the impact of FGM on women and girls and to empower community members to challenge the practice.

As part of our work to empower communities to resist the practice of FGM the Scottish Government funds MY Voice, a participatory action research project that is working with communities in Scotland affected by Female Genital Mutilation (FGM) to ensure their voice is heard in the development of policy and practice. The project empowers communities to challenge and prevent FGM. Engagement with affected communities has been through the use of peer research methods which train young people, women and men affected by FGM as peer researchers and educate and empower them to challenge the continued justification of FGM. Outputs include research reports detailing attitudes, perceptions and experience of FGM among affected communities in Scotland and highlighting recommendations for further action. Alongside this work, the project is reaching out to minority ethnic agencies to gather information about existing support services. This work will inform the development of training resources to ensure effective, culturally sensitive services to communities affected by FGM. The findings from MY Voice are helping to identify key issues and help determine ways in which community participation can be built in to the Scottish response to FGM more effectively.

² <https://consult.scotland.gov.uk/violence-against-women-team/equally-safe/>

Kenyan Women in Scotland Association (KWISA) an African women led organisation, promotes empowerment and advocacy for African women, girls and their families to speak for themselves. KWISA does this by creating spaces, giving a voice and supporting Africans in Scotland particularly in tackling violence against women. KWISA has pioneered engaging with communities and faith leaders in Scotland and works towards restoration of the dignity of women and girls, preventing FGM and other harmful traditional practices (HTPs) and supporting women and families affected by FGM to protect girls at risk. KWISA addresses all types of FGM because many victims suffer other types which are not addressed by other groups in Scotland and works with women, faith leaders and young people in Scotland and in Africa. KWISA facilitates engagement between service providers and women and girls affected by FGM and other HTPs as a means to improving service delivery.

In the health sector, a review of current activity across Health Boards in Scotland on all forms of GBV is underway. This will provide a national picture of local responses to FGM and will inform the development of future priorities for the NHS in Scotland, including specific actions to progress practice in relation to FGM.

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 behaviour and are supported to do so**

These Objectives and those under Provision and Protection align with Priority 3 and 4 of the Equally Safe Delivery Plan and should be viewed as contributing to work in this area. As previously stated, the multi-agency Violence Against Women Partnership Guidance, published by CoSLA and the Scottish Government 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 VAWG at a local level, including FGM.

To ensure those partnerships, are in place, Scottish Government officials are working closely with the Improvement Service who coordinates the National VAW Network. The network aims to improve the capacity and capability of VAW Partnerships to implement the ambitions set out in Equally Safe at a local level and to support Partnerships to engage effectively with community planning processes.

The Network brings together VAW Partnership Coordinators/Lead Officers across Scotland and other key stakeholders including the Scottish Government and CoSLA to share information, learning and resources and ensure that there is meaningful engagement and a coordinated approach taken on relevant issues.

In recognition of the wide range of women and girls who may be affected by FGM, **Police Scotland** continues to partner with the Scottish Government and community based organisations to raise awareness of FGM. Their participative strategy seeks to ensure that affected communities are aware of the law and importantly are reassured that the response from Police, to FGM related concerns, will be both sensitive and with the protection of those affected at the heart of that response. Police Scotland has both Child Protection and HBV multi agency working groups in place.

Both of these groups have representation from across the statutory sector and include representatives from affected communities. Police Scotland has explicit Standard Operating Procedures (SOPS) for FGM and harmful traditional practices.

In the **Education** sector in Scotland, schools and early learning centres are supported to evaluate and improve their practice in relation to safeguarding and child protection. Self-evaluation resources such as How good is our school? and How Good is our early learning and childcare? provide schools and centres with guidance on effective safeguarding approaches, including female genital mutilation.

With the inclusion of a specific safeguarding and child protection quality indicator within these national improvement resources, schools are able to identify good practice and areas for development. All school inspections now include an evaluation of safeguarding and child protection approaches and the impact they are having on keeping children and young people safe. Schools and centres are asked to identify how professional learning and development of staff improves their knowledge and understanding of FGM.

Education Scotland is updating information related to FGM on the National Improvement Hub (NIH). In collaboration with other agencies, we are identifying appropriate resources to support practitioners in schools and early learning centres and will promote relevant information and resources on the NIH.

The Scottish Government continues to fund a range of community based organisations to raise awareness of the harmful effects of FGM and a range of interventions and projects to recognise the important role played by young people and to empower them to challenge the practice.

- Funding to the MY Voice participatory action research project which supports work with FGM affected communities in Scotland has highlighted issues around prevention and relations with both schools and the police. While the overwhelming majority of people who participated in the research stated that they were against FGM, taking action to prevent it in their own community was more challenging

From Phase 1 of the My Voice peer research

- *“People feel uncomfortable going to the police directly about any concerns they have if they think friends or family are considering carrying out FGM to a young girl saying ‘It is not in our nature to report to the police’. People are however more comfortable discussing possible concerns and how to manage pressure from a family with workers in community organisations who are known to work on the issues related to FGM My Voice has worked to build trust and facilitate communication between the Police and members of affected communities by inviting the police to address the final consultation workshop of the Peer research. Some practical suggestions were made around establishing other routes for reporting that would be easier for communities to access.”*
- In a second round of peer research which was carried out with women, there were a number of examples of good prevention work being highlighted.

These case studies highlight the experiences of individual women. They show their attitudes to the practice and how they view the approach taken by statutory agencies. The case studies also provide an example of successful multi agency working and good coordination between services to make sure women are protecting their daughters on visits home.

A woman with twin daughters at a nursery in Edinburgh told the nursery staff she was planning to go back to Sudan for an extended visit for a year. The woman, who was aware of the prevalence of FGM in Sudan, sought advice and help to keep her girls safe. She said she was able to get advice from a social worker and from the nursery staff, who talked to her about safety planning. Together they discussed her views on FGM and the woman explained that she was against it. Together they discussed how she planned to protect her daughters and talked this through with her. Social workers gave her a number and said, if you have any problems in your country you can call the number in the UK and they will call the embassy in Sudan and pick up your family and take them back straight away.

They recommended that she did not go for such a long visit this time. She went to Sudan as planned but only stayed for 2 months. She was scared about going and scared about coming back, she was scared that her mother and granny would do something to her kids saying 'you know in my country if I have a girl and I go outside with my husband, my mum will take my girl and she can do anything because she has looked after them. Because of your religion you have to respect your mum, you can't be rude to her. You just cant'.

When she arrived back in Sudan she told her granny and mum 'you are not allowed to do anything to my daughter because there are a lot of laws in Scotland, maybe they are going to put me in detention'. She told the peer researcher 'I don't want to do this to my daughters, it was done to me and it was very bad for me.

However another woman who is passionately against FGM reported that she took her two young girls back to visit her family in a high prevalence FGM country and no one made contact with her or her daughters either before she went or when she returned. She felt she should have been checked up on.

- Funding to KWISA to raise awareness about FGM and other HTPs among African women, girls and their families. KWISA also works to improve design and delivery of services by raising awareness of FGM and other HTPs by facilitating engagement between service providers and women and girls affected by these issues. KWISA uses a holistic approach in preventing FGM based on their knowledge and experience that social change happens when the people who are affected by an issue take an active role in tackling the problem with support from policy and laws. It involves all members of the community from youth to faith leaders from different African countries. With the slogan 'FGM is more than cutting, KWISA strongly recommends avoiding personal or single-story approaches and focuses on all types of FGM especially Type 4 which is least known in Scotland. Work includes:
 - engaging women and girls to speak for themselves.

- This project has built the foundation of work to address the impact of other HTPs such as elongation³ on the sexual and reproductive health of women from communities where such practices are prevalent.
- Training community champions and volunteers who are taking an active role in the community raising issues related to FGM.
- Engagement with faith leaders with a view to signing a declaration against FGM.
- Facilitated joint events between service providers and survivors of FGM and other HTPS.
- KWISA created spaces for empowering, supporting and engaging women and girls to speak for themselves
- Supported women and girls affected by FGM and other HTPs.
- KWISA contributes to FGM working Groups and National strategic groups.
- Maintained international links with FGM campaigners in the Diaspora and in Africa and continue to monitor global trends on FGM to ensure a coordinated approach.

³ <http://www.afruca.org/wp-content/uploads/2016/11/Final-Labia-Elongation-FGM-Report.pdf>

Provision:

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

A range of work is being taken forward to ensure that women and girls have access to services and that service providers are equipped with the skills to respond effectively, as described below:

This includes the Multi Agency Practice Guidance previously referenced due for publication in 2017. Additionally, Police Scotland facilitates quarterly meetings covering both FGM and wider forms of Honour Based Violence (HBV). Attendance includes Scottish Government, NHS, community based organisations. The National Action Plan Implementation Group facilitates wider discussion and information sharing.

Colleagues in Health Scotland are working with the Scottish Refugee Council and community representatives to develop mechanisms for engagement with local health boards to promote awareness of needs, and accessibility of local healthcare services.

A short life working group within NHS Scotland noted the dependency on clinical staff for the recording of FGM in the correct part of the clinical records e.g. in hospital discharge summaries and GP practice clinical records. Therefore to ensure that health professionals in Scotland are able to respond effectively to FGM a letter from the Chief Medical Officer/Chief Nursing Officer, issued February 2016, requested that health professionals in Scotland implement processes for the recording of FGM within health boards. Details of appropriate codes were provided in- [http://www.sehd.scot.nhs.uk/cmo/CMO\(2014\)19.pdf](http://www.sehd.scot.nhs.uk/cmo/CMO(2014)19.pdf)

Additionally the letter from Chief Medical Officer/Chief Nursing Officer, February 2016, issued guidance on service specification and service standards in relation to FGM. It further advised boards to develop pathways of care for survivors and to raise awareness of health professionals across key service areas. [http://www.sehd.scot.nhs.uk/cmo/CMO\(2016\)05.pdf](http://www.sehd.scot.nhs.uk/cmo/CMO(2016)05.pdf) Officials are working in partnership with NHS Scotland Data Management & Strategic Development to assess and monitor appropriate data capture.

NHS National Education Scotland (NES) is leading the development of a Knowledge and Skills Framework⁴ on trauma informed service provision which has been available from May 2017. Implementation of the model, and accompanying training, will be developed subsequently. Police Scotland has been a key partner in the development of multi-agency guidance and has input comprehensively in the development of protocols around information sharing and risk assessment.

⁴ <http://www.nes.scot.nhs.uk/education-and-training/by-discipline/psychology/multiprofessional-psychology/national-trauma-training-framework.aspx>

The My Voice research has documented extensive trauma among women who have experienced FGM and are now living in Scotland. There are also numerous accounts of problems with sexuality including the need for medical treatment. Defibulation is now being offered as part of obstetric care in parts of Scotland and although this is a difficult issue for women to deal with, and physically uncomfortable, a number of the MY Voice participants said it had improved their health and quality of life.

The performance management framework being developed by the Improvement Service will be used to measure the work that is being undertaken locally to address all forms of VAWG, and the impact it is having. While in development, it is intended that it will include indicators to begin to capture data on the numbers of women and children identified as being affected by different forms of VAWG at a local level, including FGM.

The National Adult Protection Coordinator (NAPC) raised implementation of the FGM Action Plan at the Scottish Adult Support and Protection Conveners Group (SASPG) on 15th February 2017 and the Social Work Scotland Adult Protection Network (Lead Officers/Coordinators) on 7th February 2017. The NAPC has provided a written list of comments received for consideration the implementation group.

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**

Police Scotland has developed Standard Operating Procedures (SOPs) to ensure that their response to FGM is consistent, sensitive and meets the needs of individuals and communities affected. They will ensure that where criminality has been identified those who have chosen to perpetrate FGM can be held to account for their actions. The SOP recognises that where a child or young person is involved a Getting it Right For Every Child (GIRFEC) based approach will be required. Police Scotland has participated across the statutory and third sector fully in the development of the Multi Agency Guidance to ensure that responses on a multi-agency basis are connected, consistent and take into account the need to share information safely and appropriately to keep those at risk or who have been affected safe.

The National Child Protection guidance provides a national framework within which agencies and practitioners at local level – individually and jointly – can understand and agree processes for working together to support, promote and safeguard and the wellbeing of all children. It sets out expectations for strategic planning of services to protect children and young people and highlights key responsibilities for services and organisations, both individual and shared. It also serves as a resource for practitioners on specific areas of practice and key issues in child protection. The revised National Guidance for Child Protection in Scotland, published in May 2014, continues to inform best practice by providing a clear definition of what abuse is. It sets out our expectations for all individuals working with children and young people to identify and act on child protection concerns. The revised guidance contains a strengthened section on FGM and will continue to inform practice in relation to responding effectively as we move forward.

A Multi Agency Writing Group, with membership from the statutory, third sector and community based organisations from FGM affected organisations (or diaspora organisations) has developed for publication in 2017 Multi Agency Guidance for agencies and organisations responding to and supporting those affected by FGM. The guidance is for all services, agencies, organisations and individuals responsible for protecting and promoting the health and welfare of women and girls. This includes local authorities, Police Scotland, the NHS, third sector organisations and crucially FGM affected communities that work with girls and women at risk of or affected by FGM or deal with its consequences.

It will:

- identify whether a girl (including an unborn girl) or young woman may be at risk of FGM;
- how to identify a girl or woman who has undergone FGM; how to protect those at risk and support those already affected;
- how to prevent and end FGM; making clear that statutory bodies and strategic partnerships such as
 - local authorities,
 - health boards,
 - Police Scotland, Community Planning Partnerships and
 - integrated boards
- ensure that their member agencies work together effectively to tackle FGM; support a multi-agency response to support collaborative risk based working between statutory and non-statutory agencies and the affected communities, to meet the often complex needs of women and girls affected by FGM, outlining the issues and presents good practice when dealing with victims.
- set out how agencies, individually and together, can protect girls and young women from FGM, and how they can respond appropriately to survivors.

Next Steps

The Multi Agency FGM National Implementation Group will:

- continue to monitor and oversee progress;
- review existing actions and currency and consider any refinement

Year One Update Table

Overarching

Objectives/ Timescale	Action	Activities	Action Owner	Progress/Status (RAG)
<p>Positive gender roles are promoted to ensure that women and girls affected by FGM are empowered to achieve their full potential.</p> <p>Medium</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 Partnerships, Child Protection Committee (CPC) Scotland, Multi-Agency Risk Assessment Committees (MARACs)</p>	<p>FGM is referenced in Equally Safe. Multi-Agency Practice Guidance due for publication in 2017 includes best practice for agencies and organisations responding to FGM. VAWPs are currently in the process of developing their new strategies or reviewing their existing ones to ensure compliance with this guidance and the ambitions set out in Equally Safe. The multi-agency Violence Against Women Partnership Guidance that was published by CoSLA and the Scottish Government 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 VAWG at a local level, including FGM.</p> <p>Police Scotland is updating strategic and local action plans.</p>
<p>Short/Medium</p>	<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 from FGM</p>	<p>All statutory and third sector organisations</p>	<p>Ongoing – Scottish Government has funded the development of a range of training and awareness raising materials in relation to FGM. Funding has continued into 2017/2018. All materials have been widely circulated.</p>

				<p>KWISA - empowerment programme for survivors; main focus is guardianship of African women's dignity using a holistic approach and emphasis that FGM is more than cutting.</p> <p>Universities and Service Providers – carry out community focused awareness raising with aim to highlight the important role of affected communities in ending FGM.</p>
<p>Women and men have equality of opportunity particularly with regard to access to resources.</p> <p>Medium/Long</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 the 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>	<p>A review of current activity across Health Boards in Scotland on all forms of GBV is underway. This will provide a national picture of local responses to FGM and will inform the development of future priorities for the NHS in Scotland, including specific actions to progress practice in relation to FGM.</p> <p>Police Scotland is updating strategic and local action plans and working with other key stakeholders in contributing to multi-agency guidance.</p>

Prevention

Objectives/Timescale	Action	Activities	Action Owner	Progress/Status
<p>Women and girls potentially affected by FGM feel safe, respected and equal in our communities.</p> <p>Short</p>	<p>Provide clarity of legislation and policy position on FGM in Scotland</p>	<p>Provide FGM Statement and 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>FGM statement was reprinted Summer 2016 and widely disseminated through networks. The FGM statement was updated, reprinted and distributed again in summer 2017.</p> <p>Scottish Government officials provided input into Police Scotland Operation Limelight in September 2016.</p> <p>Police Scotland engaged with other forces across the country in Operation Limelight. The terms of reference for this operation have been extended to not only enforcement work around ports and airports but to overarching work around eradication of FGM.</p> <p>Police Scotland facilitated an FGM Conference with the theme of “Breaking Down Barriers” on 9th June 2017.</p> <p>KWISA – ongoing awareness raising with affected communities highlights legislative framework and policy on FGM in Scotland and comparison with other countries.</p>
<p>Medium</p>	<p>Implement an FGM prevention plan to prevent harm and support women and girls at risk of harm</p>	<p>All partners to engage with multi-agency working groups and committees, nationally and at a local authority level</p>	<p>Individual and multi-agency response 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)</p>	<p>The multi-agency Violence Against Women Partnership Guidance that was published by CoSLA and the Scottish Government 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 VAWG at a local level, including FGM. The Improvement Service is currently funded by the Scottish Government to provide support to all VAW Partnerships across Scotland, to help ensure they are operating</p>

				<p>effectively and to help them to undertake the key activities expected of them. To support this work, we are in the process of setting up a working group (with representatives from the CPP Manager Network, VAW Network, COSLA and the Improvement Service) to develop a set of 'service standards' that outline the key process/ services that are expected to be in place at a local level to tackle all forms of VAWG (including FGM) that local authority areas can assess themselves and report against.</p> <p>Police Scotland is working with key stakeholders to contribute to the multi-agency guidance. If Police Scotland receives reports of FGM they will be dealt with robustly through each divisions child protection procedures.</p>
Medium		Police Scotland, with partner agencies will coordinate local and national media campaigns to raise awareness of emerging forms of abuse	Police Scotland	<p>Police Scotland is progressing an awareness raising strategy. They have participated in events around Day of Zero Tolerance and research projects. Police Scotland held a multi-agency FGM Conference "Breaking Down Barriers" on 9th June 2017. There is ongoing discussion regarding the best methods for intelligence capture.</p>
Medium		Police Scotland, with partner agencies, will implement prevention strategies to influence social attitudes and reduce vulnerability	Police Scotland	<p>Police Scotland has Child Protection multi-agency working groups in place. Membership of these groups is drawn from the statutory sector including NHS, Social Work, Education, government and crown office.</p> <p>Police Scotland held a multi-agency FGM Conference "Breaking Down Barriers" on 9th June 2017. They will continue to build relationships with third sector organisations and members of the potentially affected communities.</p>

				Kenyan Women in Scotland Association (KWISA) has held joint events with the police to raise awareness in communities of the role of the police in preventing FGM.
Medium		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	Police Scotland has Standard Operating Procedures (SOPS). The current SOP for FGM and harmful traditional practices is under review. SOPs ensure that the response to FGM is consistent, sensitive and meets the need of individuals and communities affected. The SOP recognises that where a child or young person is involved a GIRFEC based approach will be required. Police Scotland has participated with statutory and third sector partners fully in the development of the Multi Agency Guidance to ensure that responses on a multi-agency basis are connected, consistent and take into account the need to share information safely and appropriately to keep those at risk or who have been affected safe.
People enjoy healthy, positive relationships and understand the damaging effects that FGM has on those relationships Short	Provide information about FGM and gender equality and children's rights	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	Scottish Government, third sector and statutory agencies	SG has developed and maintains currency of its on line FGM information resources and continues to fund the Women's Support in 2017/2018 to maintain and develop FGM awareness raising and training resources for professionals to help them respond to FGM. Scottish Government Web Pages: https://beta.gov.scot/policies/violence-against-women-and-girls/female-genital-mutilation-fgm/ OneScotland: http://onescotland.org/ FGM Aware: http://www.fgmaware.org/ SG has reprinted and distributed widely the FGM statement.

				<p>SG has also funded for 2017/2018 (£60k) My Voice which raises awareness of FGM amongst young people and communities.</p> <p>SG funds Kenyan Women in Scotland Association (KWISA) £25k 2017/2018 to raise awareness in the African community in Scotland. Cabinet Secretary for Communities Social Security and Equalities provided the keynote address at their annual conference in February 2017.</p>
Objectives/Timescale	Action	Activities	Action Owner	Progress
Short		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	<p>Discussion with NHS Scotland ongoing through development of guidance and through implementation group.</p> <p>Schools and early learning centres are supported to evaluate and improve their practice in relation to safeguarding and child protection. Self-evaluation resources such as How good is our school? and How Good is our early learning and childcare? provide schools and centres with guidance on effective safeguarding approaches, including female genital mutilation. With the inclusion of a specific safeguarding and child protection quality indicator within these national improvement resources, schools are able to identify good practice and areas for development. All inspections now include and evaluation of safeguarding and child protection approaches and the impact they are having on keeping children and young people safe. Schools and centres are asked to identify how professional learning and development of staff improves their knowledge and understanding of FGM.</p> <p>Education Scotland is currently updating information related to FGM on the National</p>

				Improvement Hub (NIH). In collaboration with other agencies, we are identifying appropriate resources to support practitioners in schools and early learning centres and will promote relevant information and resources on the NIH.
Short		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	<p>Scottish Government has funded a range of training and awareness raising materials on the health impact of FGM and continues to fund in 2017/18.</p> <p>In February 2016 Chief Medical Officer/Chief Nursing Officer, issued guidance on service specification and service standards in relation to FGM. It further advised boards to develop pathways of care for survivors and to raise awareness of health professionals across key service areas.</p> <p>http://www.sehd.scot.nhs.uk/cmo/CMO(2016)05.pdf</p> <p>Multi-Agency Guidance due for publication in 2017 will also contain information on the health implications of FGM.</p>
Medium		Scope the impact and implications that elongation of labia and other practices has on potentially affected communities in Scotland, and develop appropriate response	Scottish Government, third sector organisations, NHS Boards	<p>Discussion on other harmful traditional practices such as elongation will be progressed through the implementation group.. Scottish Government officials carry out ongoing liaison with Home Office officials including discussion around other harmful traditional practices. Confirmation provided in July 2016 that no hard evidence exists in England and Wales; however some anecdotal evidence from communities.</p> <p>Research published in England and Wales will help to inform discussion in Scotland.</p> <p>http://www.afruca.org/wp-content/uploads/2016/11/Final-Labia-Elongation-FGM-Report.pdf</p> <p>Through engagement, KWISA has confirmed that labia elongation (LE) has not been addressed in</p>

				the past due to lack of awareness in potentially affected communities that it is a form of FGM; and has established the need for a scoping exercise in Scotland. Such a study will not only confirm the scope and implication of elongation, but it will raise awareness about the phenomenon, both in potentially affected communities and with service providers.
Individuals and communities recognise the implications and are able to challenge FGM Medium	Communities potentially affected by FGM and professionals 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	Investment made in community engagement and development to enable the recognition of the implications of FGM and are able and empowered to challenge the practise of FGM. This to include all sections of the potentially affected communities including men, women, children and young people	Scottish Government and other funders	<p>SG funding for (£270,000 2017/2018) supports a range of interventions and projects to recognise and to empower young people to challenge FGM in Scotland. Funding Includes:</p> <p>Kenyan Women in Scotland Association FGM is More than Cutting £ 30,000 Waverley Care (DARF) My Voice: Participatory Action Research £60,000 Saheliya Equal Safety Project £48,783 Saheliya Champions for Change £18,000</p> <p>For example: Kenyan Women in Scotland Association (KWISA) training incorporates the role of communities in ending FGM.</p> <p>KWISA is delivering an empowerment programme for survivors; main focus is guardianship of African women's dignity using a holistic approach and emphasis that FGM is more than cutting. Using a Do No Harm approach, our goal is to end FGM without denigration.</p> <p>KWISA uses a rights based community development approach which recognises that women's equality and empowerment are key to eradication of FGM and other harmful practices. Zero Tolerance Conference targeted affected communities and attended by religious leaders from diverse faiths and all stakeholders -Ongoing engagement with faith leaders with view</p>

				to sign a declaration against FGM this will take place in 2017).
Short/Medium		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	Scottish Government and all partners in statutory and third sector	SG has developed and maintains currency of it's on line FGM information resources and has funded third sector organisation (£40k 2017/2018 to maintain and develop FGM awareness raising and training resources for professionals. Scottish Government Web Pages: https://beta.gov.scot/policies/violence-against-women-and-girls/female-genital-mutilation-fgm/ OneScotland: http://onescotland.org/ FGM Aware: http://www.fgmaware.org/
Individuals who support FGM change their attitudes and behaviour and are supported to do so Medium	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	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	Scottish Government and other funders	SG funding for 2017/2018 (£270,000) supports a range of interventions and projects to recognise and to empower young people to challenge FGM in Scotland. Kenyan Women in Scotland Association Preventing FGM and addressing the impact of Harmful Traditional Practices (HTP) £ 20,000 Waverley Care (DARF) My Voice: Participatory Action Research £60,000 For example , KWISA has pioneered a holistic approach on Harmful Practices (HPs) based on knowledge and experience that social change happens when the people who are affected by an issue take an active role in tackling the problem

				<p>with support from policy and laws. KWISA has maintained international links with FGM campaigners and with affected communities in and monitors global updates on FGM to ensure a coordinated approach and awareness of changing trends.</p>
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Provision

Objectives/Timescale	Action	Activities	Action Owner	Progress/Status
<p>Women and girls who have been affected and who are potentially affected by FGM have access to relevant, effective and integrated services</p> <p>Medium</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 other statutory and third sector agencies</p>	<p>Multi Agency Guidance covering responding to FGM will be published in 2017.</p> <p>Multi-Agency attendance at Police Scotland Child Protection Strategic Group is continuing on a quarterly basis. These groups bring together representatives from across Police, the statutory sector to receive updates on and to discuss best practice in relation to FGM.</p> <p>The FGM National Action Plan Implementation Group facilitates wider discussion and information sharing.</p> <p>Health Scotland is working with Scottish Refugee Council and community representatives to develop mechanisms for engagement with local health boards to promote awareness of needs, and accessibility of local healthcare services.</p>
<p>Short</p>		<p>All statutory agencies have at least one named professional with expertise on FGM in addition to the lead officer, where they are different individuals</p>	<p>All statutory agencies</p>	<p>Multi Agency Guidance due for publication in 2017 will inform the process to deliver a named lead in relation to FGM. Implementation Group will facilitate this. Letter from Chief Medical Officer/Chief Nursing Officer issued February 2016 requested that health professionals in Scotland implement processes for the recording of FGM within health boards. Details of appropriate codes were provided in- http://www.sehd.scot.nhs.uk/cmo/CMO(2014)19.pdf</p> <p>Police Scotland Public Protection Policy Support holds the portfolio for FGM and will represent the force at meetings and events. The Detective Inspector within the family Protection Unit in each division has local oversight of FGM.</p>

Medium	Consistent recording and reporting of FGM data to inform responsive and high quality service development and monitoring of services	Demonstrate improved data capture for FGM: recording reporting risk assessment referrals/monitoring information sharing	All statutory agencies	<p>Letter from Chief Medical Officer/Chief Nursing Officer issued February 2016 requested that health professionals in Scotland implement processes for the recording of FGM within health boards. Details of appropriate codes were provided in- http://www.sehd.scot.nhs.uk/cmo/CMO(2014)19.pdf Importantly, the ISD led short life working group has noted the dependency on clinical staff for the recording of FGM in the correct part of the clinical records e.g. in hospital discharge summaries and GP practice clinical records. SG officials and health leads are liaising to discuss how this is being taken forward in practice and to examine data collection in the health setting.</p> <p>All FGM concerns will be raised on a Child Concern Form within Police Scotland interim vulnerable persons database. This allows for information to be shared with relevant partners and any subsequent IRD (Interagency referral discussion) to be undertaken. We have also commenced a national register to collate figures. The submission of intelligence on SID (Scottish Intelligence Database) is embedded in child protection procedures.</p>
Medium		Multi-agency information sharing protocol developed and publicised locally to statutory and non-statutory sectors	All statutory agencies	Subject to discussion. Outline in Multi Agency Guidance. To be published 2017.
Short/Medium	Each NHS Board has a clear protocol and a referral pathway to ensure a coordinated and comprehensive health and social	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	NHS Boards, IJBs	Letter from Chief Medical Officer/Chief Nursing Officer, February 2016, issued guidance on service specification and service standards in relation to FGM. It further advised boards to develop pathways of care for survivors and to raise awareness of health professionals across key service areas.

	care service, including generalist and specialist services, are available and accessible informed by the local need	about the range of health and other local and national statutory and voluntary sector services that offer support to survivors of FGM		http://www.sehd.scot.nhs.uk/cmo/CMO(2016)05.pdf Importantly, the ISD led short life working group has noted the dependency on clinical staff for the recording of FGM in the correct part of the clinical records e.g. in hospital discharge summaries and GP practice clinical records.
Objectives/Timescale	Action	Activities	Action Owner	Progress/Status/Status
Short/Medium		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	Multi-Agency Guidance to be published 2017 will help to inform the provision of advice and information to survivors. NHS Lothian has developed an information leaflet on FGM and a home visit for all pregnant women is offered.
Short/Medium		Individuals who experience trauma as a result of FGM should receive access to trauma informed mental health services	NHS Boards, IJB's	Implementation Group will facilitate discussion as to how survivors can access services. In Lothian a specialist midwife is able to refer women affected by FGM to a psychiatrist for support. NHS NES is leading the development of a Knowledge and Skills Framework on trauma informed service provision available in April 2017. Implementation of the model, and accompanying training, will be developed subsequently.
Short/Medium	Through partnership working improve Police Scotland's response to FGM and increase opportunities 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	Police Scotland has been a key partner in the development of multi-agency guidance and has input comprehensively in the development of protocols around information sharing and risk assessment. Work is ongoing in relation to developing best methods for capture of intelligence specific to FGM from affected communities. Police Scotland has also commenced a national register to collate figures. The submission of intelligence on SID (Scottish Intelligence Database) is embedded in child protection procedures.

Short/Medium		Improve the reporting methods by third party reporting for those affected by FGM	Police Scotland, all statutory agencies, third sector organisations	Multi-agency guidance due for publication in 2017 will provide best practice for agencies and organisations in reporting FGM. Work is ongoing in relation to the best methods for third party reporting in relation to FGM.
Medium		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 an overall assessment of FGM prevalence across Scotland	Police Scotland, Child and Adult Protection Committees, CPC, ASPC Scotland, MARACs, and VAWPs	<p>As part of the Equally Safe Accountability Workstream, the Improvement Service is currently in the process of developing a performance management framework that can be used to measure the work that is being undertaken locally to address all forms of VAWG, and the impact it is having. While this is still in development, it is intended that it will include indicators to begin to capture data on the numbers of women and children identified as being affected by different forms of VAWG at a local level, including FGM. The draft indicators included in the performance framework are currently being tested in 18 VAW Partnerships across Scotland with feedback due by the end of May. They are also being consulted on as part of the consultation on the Equally Safe Delivery Plan.</p> <p>All FGM concerns will be raised as a child concern form within the interim vulnerable persons database. This allows for information to be shared with relevant partners and any subsequent IRD (Interagency referral discussion) to be undertaken. Police Scotland has also commenced a national register to collate figures. FGM Submissions on Scottish Intelligence Database are also embedded in child protection procedures.</p>

<p>Service providers competently identify FGM, and respond effectively</p> <p>Short/Medium</p>	<p>All 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</p>	<p>To develop multi-agency national guidance for front line staff and their organisations, to address FGM in Scotland</p>	<p>NHS Health Scotland, Police Scotland, local authorities, CPPs, higher educational institutions and all relevant third sector organisations</p>	<p>Multi Agency Guidance will be published in 2017 and will be widely disseminated.</p> <p>Community based organisations such as KWISA contributed to the national consultation on multi-agency guidance and represented on the multiagency guidance working group.</p> <p>Specialist midwives are providing ongoing training and awareness to maternity services staff in relation to recognising and responding to FGM.</p>
Objectives/Timescale	Action	Activities	Action Owner	Progress/Status/
<p>Medium</p>		<p>All statutory agencies will develop a comprehensive suite of guidance documents to ensure all staff is confident and competent at identifying and responding appropriately</p>	<p>All statutory agencies and higher educational institutions</p>	<p>Multi-Agency Guidance due for publication in 2017 will help to inform staff responses to disclosures of FGM, inform risk assessment and appropriate action in cases of FGM.</p> <p>A local multi-agency protocol has been developed in Lothian and Borders to assist staff across agencies to identify and respond to FGM.</p> <p>Police Scotland Standing Operating Procedures for FGM are currently under review.</p>
<p>Short/Medium</p>		<p>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 action</p>	<p>NHS Boards, NHS Health Scotland and IJBs</p>	<p>Multi-Agency Guidance due for publication in 2017 will help to inform staff responses to disclosures of FGM, inform risk assessment and appropriate action in cases of FGM.</p> <p>A proposal to develop training on the clinical identification and management of FGM in addition to existing awareness raising packages is being developed with key clinicians, specialists and 3rd sector agencies to support improved detection and response.</p>

<p>Medium</p>		<p>To develop and maintain FGM educational materials and resources for teachers to support children, parents/carers and other networks, to include annual safeguarding update</p>	<p>Education Scotland</p>	<p>In the Education sector in Scotland, schools and early learning centres are supported to evaluate and improve their practice in relation to safeguarding and child protection. Self-evaluation resources such as How good is our school? and How Good is our early learning and childcare? provide schools and centres with guidance on effective safeguarding approaches, including female genital mutilation. With the inclusion of a specific safeguarding and child protection quality indicator within these national improvement resources, schools are able to identify good practice and areas for development. All school inspections now include and evaluation of safeguarding and child protection approaches and the impact they are having on keeping children and young people safe. Schools and centres are asked to identify how professional learning and development of staff improves their knowledge and understanding of FGM. Education Scotland is updating information related to FGM on the National Improvement Hub (NIH). In collaboration with other agencies, they are identifying appropriate resources to support practitioners in schools and early learning centres and will promote relevant information and resources on the NIH.</p>
<p>Medium</p>		<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; Social Work Scotland, Scottish Child Protection Committee Chair Forum</p>	<p>The National Adult Protection Coordinator highlighted the FGM Action Plan at the Scottish Adult Protection Conveners Group on 15th February 2017 and the Social Work Scotland Adult Protection Network (Lead Officers/Coordinators) on 7th February 2017.</p>

Protection

Objectives/Timescale	Action	Activities	Action Owner	Progress/Status
<p>Justice and child protection responses to FGM are robust, swift, consistent and coordinated</p> <p>Short</p>	<p>Police to ensure that they respond sensitively to the concerns raised by professionals and others</p>	<p>To develop awareness of and access to the guidance for police on how to respond to FGM</p>	<p>Police Scotland</p>	<p>Police Scotland has developed Standard Operating Procedures (SOPs) to ensure that their response to FGM are consistent, sensitive and meet the needs of individuals and communities affected. Police Scotland is currently reviewing their FGM SOP. The SOP recognises that where a child or young person is involved a Getting it Right For Every Child (GIRFEC) based approach will be required. Police Scotland has participated with statutory and third sector partners fully in the development of the Multi Agency Guidance to ensure that responses on a multi-agency basis are connected, consistent and take into account the need to share information safely and appropriately to keep those at risk or who have been affected safe.</p>
<p>Short/Medium</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, Scottish Child Protection Committee Scotland</p>	<p>The Children and Young People (Scotland) Act 2014 places the Child's Plan on a statutory basis and a Child's Plan must be instigated in all cases where a targeted intervention is required to address a wellbeing need for a child between the ages of 0 and 18 years, including where a child is at risk of significant harm and is on the child protection register.</p>

				<p>When a conference decides to place a child's name on the Child Protection Register, a plan must be agreed by the conference to reduce the risk to the child and provide support to the child and family.</p> <p>Clarity and detail must be provided relating to the roles and responsibilities of the various people involved in the plan, including agency staff and family members.</p> <p>KWISA identified lack of cultural awareness in current child protection approaches, with potential prosecution where there is no risk.</p>
Short	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 female genital mutilation in partnership with parents/carers where appropriate	CPP, IJBs and Social Work Scotland, Scottish Child Protection Committee Scotland and Adult Support and Protection Committee (ASPC) conveners	<p>Multi-Agency Guidance due for publication in 2017 will help to inform responses by setting out good practice.</p> <p>The National Adult Protection Coordinator (NAPC), Adult Protection Committee Conveners and Lead Officers/Coordinators have expressed their support for the FGM agenda and their understanding of the potential cross over between the two agendas whilst recognising that victims of FGM may not necessarily be adults at risk of harm in terms of the Adult Support & Protection (Scotland) Act. On this basis they have provided suggestions and comments on the action plan from a multi-agency and public</p>

				protection perspective for consideration in the next stage of the work. The NAPC will continue to liaise between the FGM Policy team, Adult Protection Conveners and Lead Officers/Coordinators. The NAPC will also seek the views of the national adult protection learning and development network in relation to the developing training agenda.
Those who seek to or carry out FGM are identified early and held to account by the criminal justice system Medium	Ensure legislation to address FGM in Scotland is fit for purpose	Scottish Government to continue to engage with potentially affected communities and other relevant stakeholders to consider the impact of any further legislation	Scottish Government, Crown Office and Procurator Fiscal Service (COPFS), statutory organisations, third sector organisations, Police Scotland	Scottish Government funded a community based consultation on FGM provisions in the Serious Crime Act 2015. Officials evaluated findings and submitted recommendations to Scottish Ministers.
Short/Medium		Scottish Government to liaise with UK Government to ensure efficacy of existing legislation	Scottish Government, COPFS	SG Officials maintain ongoing contact with Home Office Officials on all FGM related matters.
Short/Medium		Assess the numbers being prosecuted for performing, aiding and abetting FGM following investigations by Police Scotland	COPFS, Police Scotland	Police Scotland maintains a register of all referrals made to them where there are concerns about FGM.

Long		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	Advice has been sent to the Cabinet Secretary for Communities, Social Security and Equalities offering advice as to the timing and scope of any additional potential legislation on FGM and Harmful Traditional Practices.
Objectives/Timescale	Action	Activities	Action Owner	
Medium	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	Police Scotland is developing OLD (organisational learning and development) to share best practices and also sharing challenges and how to overcome them in complex investigations. Sharing of learning from FGM cases will be included in any future collation.
Medium		Establish a nationally accessible platform for Police Scotland to identify good practice and learning outcomes from previous investigations	Police Scotland	Police Scotland is developing OLD (organisational learning and development) to share best practices and also sharing challenges and how to overcome them in complex investigations. Sharing of learning from FGM cases will be included in any future collation.
Medium		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	To be taken forward under implementation.

Medium	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	Communication and partnership engagement is covered in the multi-agency guidance, through risk assessment, Inter Agency Discussions and case conference.
Medium		Monitor impact of gender-based hate crime taking care not to stigmatise individual communities	Police Scotland	To be taken forward under implementation.



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