Introduction of requirement for GPs to submit data under the FGM Enhanced dataset information standard.

From 1 October 2015 GPs will be required to submit data under the FGM Enhanced Dataset information standard.

This information standard is a requirement, and mandatory under the Health and Social Care Act 2012.The Clinical Audit Platform (CAP), managed by Health and Social Care Information Centre (HSCIC) will be used to collect information from GPs. HSCIC will then anonymise, analyse and publish the data. HSCIC has said that a woman or child's personal details will *never* be published in the national aggregate reports and will *never* be passed to anyone outside HSCIC.

The data required is detailed in the HSCIC document FGM Enhanced Dataset: GP Approach. There are four options that a practice may choose from for uploading the data. Computer system suppliers have been required to develop templates to support the data requirements, but these are not yet all available.

A Direction has been issued to the Health & Social Care Information Centre (HSCIC) from Dept. of Health (DH) which outlines a formal legal requirement on the HSCIC to process data, and such requirements override the usual rules around common law and confidentiality, as long as;

- there is a clear explanation to a patient about what is happening to their data - what the Data Protection Act (DPA) terms as 'fair processing' and,
- a 'fair processing' route to handle any objections to the collection

To meet the requirement to provide a '*fair processing'* notification to patients, the DH advises that clinicians should give the patient the FGM leaflet *"More information about FGM" (*2015). This is available to order online, free of charge in English and ten other languages. Organisations can also download copies from NHS Choices (http://www.nhs.uk/Conditions/female-genital-mutilation/Pages/Introduction.aspx)

The DH advises that giving the patient this leaflet fully meets the requirement for 'fair processing'. There is no requirement to discuss the FGM dataset in detail, or to ask a patient for explicit consent to collect their information.

There are two stages at which, if a patient raises an objection after having received the '*fair processing*' leaflet, their objection will be considered and acted upon. These together form the '*fair processing'* objection route:

1. If a patient raises an objection within the GP surgery, the practice must consider this objection and ensure they record the decision within the healthcare record.

2. If the objection is *not* raised until the information has been submitted, the woman can contact HSCIC at a later date to raise an objection at the following website: http://www.hscic.gov.uk/media/14700/Preventing-the-use-of-your-information-for-health-andor-social-care-purposes-other-than-direct-care/pdf/Preventing_Use_of_Your_Information_Form.pdf

   The objection will be automatically enforced and the patient's data will be removed from being processed for inclusion within any future publications.