

Dear

FREEDOM OF INFORMATION REVIEW – GENDER IDENTITY CLINIC AND CHALLENGING BEHAVIOUR CLINIC

I write in response to your request for review of NHS Lothian's response to your Freedom of Information request about the Gender Identity Clinic and the Challenging Behaviour Practice.

Having discussed your request and our response of 13 March 2025 further with [person], I can respond as follows:

Original Request and Response:

Question:

1. Please provide copies of any existing, in-use policy or guidance documents within your practice/group on the topic of prescribing hormonal replacement therapy for the purpose of alleviating gender dysphoria in transgender patients, following recommendation from either private or NHS Gender Identity Clinics. If the full documents are exempt from release, please instead provide the titles and a summary of the contents.

2. Please provide copies of any existing, in-use policy or guidance documents within your practice/group on the topic of issuing bridging prescriptions of hormonal replacement therapy to transgender patients, prior to assessment by either private or NHS gender identity clinics. If the full documents are exempt from release, please instead provide the titles and a summary of the contents.

Answer:

NHS Lothian is providing details on behalf of the Challenging Behaviour Practice, which is a 2c medical practice run directly by NHS Lothian.

The Practice uses the attached shared care agreement as a guide for treatment of patients who are being treated by NHS Lothian's Gender Identity Clinic.

Question:

3. Please provide the number of patients registered in your surgery who are being issued with estradiol or testosterone prescriptions on the recommendation of a gender identity

clinic. Please also identify how many of these prescriptions were issued in agreement with an NHS GIC, and how many were issued on the recommendation of a private clinic.

Answer:

This information is not held centrally. The total number of patients treated with these drugs would be available, but it is not possible in our system to link these to the diagnosis or reason for prescribing, or determine whether the referral was from a private or NHS clinic. These drugs are also used to treat other conditions. Information may be held in individual patient records, but in order to provide the information you request it would be necessary to review each patient record over the period you have specified, requiring significant resources. Under section 12 of the Freedom of Information (Scotland) Act 2002, NHS Lothian is not required to respond to your request if the resources required to do so equate to more than £600 in cost.

Question:

4. Please provide copies of any existing, in-use policy or guidance documents within your practice/group on the topic of administering blood tests for patients self medicating hormone replacement therapy for the purpose of alleviating gender dysphoria; please also identify the specific tests that would be administered, if possible. If no such documents exist, please summarise your practice's/group's policy as best you can.

5. Please provide copies of any existing, in-use policy or guidance documents within your practice/group on the topic which blood tests you administer to patients who have been issued a bridging prescription of hormone replacement therapy for the purposes of alleviating gender dysphoria.

6. Please provide copies of any existing, in-use policy or guidance documents within your practice/group on the topic of when and how patient safety risk assessments (or equivalent considerations) are or should be performed in the process of issuing, rejecting, or ending a bridging prescription of hormone replacement therapy for the purposes of alleviating gender dysphoria.

Answer:

This information is included in the shared care agreement documents provided in response to question 1 above. The Practice does not have any further policies or guidance documents regarding this.

Question:

7. Please provide copies of any existing, in-use policy or guidance documents within your practice/group on the topic of how to approach treatment and alleviation of gender dysphoria in patients who are unable to access any form of Gender Identity Clinic. If no such documents exist, please summarise your practice's/group's policy as best you can.

Answer:

This information is also included in the shared care agreements provided, under 'new patient'. The Practice does not have any further policies or guidance documents regarding this.

Review Request:

Question:

The documents you provided do not contain information on your practice policies on issuing bridging prescriptions of hormonal replacement therapy to transgender patients prior to GIC (private or NHS) assessment as you stated they did in response to point Two.

Answer:

The documents provided included the only written policy the practice uses regarding patients referred for assessment at the Gender Identity Clinic. The Challenging Behaviour Clinic does not use any written or agreed policies specifically covering bridging prescriptions for hormone replacement therapy. The decision to prescribe any treatment would be determined by the GP according to each individual patient's needs.

Question:

The documents you provide to answer point Four do not contain information on what blood tests you provide for patients self-medicating hormone replacement therapy for the purpose of alleviating gender dysphoria, only what monitoring is followed after GIC assessment is completed.

Answer:

The Challenging Behaviour Clinic does not use any written or agreed policies on blood tests for patients self medicating hormone replacement therapy. The decision to offer a blood test would be determined by the GP according to each individual patient's needs.

Question:

The documents provided to answer point Five do not contain information on which blood tests you administer to patients who have been issued a bridging prescription of hormone replacement therapy for the purposes of alleviating gender dysphoria, they contain information on which blood tests are provided after GIC assessment is completed.

Answer:

As above, there are no written policies or agreed policies about blood tests offered.

If you are not satisfied with this response you still have the right to make a formal complaint to the Scottish Information Commissioner who you can contact at the address below or using the Scottish Information Commissioner's Office online appeals service at <https://www.foi.scot/appeal>. If you

remain dissatisfied with the Commissioner's response you then have the option to appeal to the Court of Session on a point of law.

Scottish Information Commissioner
Kinburn Castle
Doubledykes Road
St Andrews, Fife
KY16 9DS
Telephone: 01334 464610
Fax: 01334 464611
e-mail: enquiries@foi.scot

Yours sincerely

Peter Johnston
Freedom of Information Reviewer/
Non Executive Director NHS Lothian
cc: Director of Human Resources and
Organisational Development