

Freedom of Information Act 2000 (FOIA)

Decision notice

Date: **19 February 2025**

Public Authority: **Dr Jessica Agarwal and Dr M D Agarwal**

Address **Greet Medical Practice**
50 Percy Road
Greet
Birmingham
B11 3ND

1. Request:

The complainant requested the following information from Dr Jessica Agarwal and Dr M D Agarwal (Greet Medical Practice) on 31 October 2024:

- 1) Are there transgender Shared Care Agreement and Bridging Prescription policy/guidance documents in use at your practice/group? If so, please share these documents or summarise the key points.
- 2) How many transgender Shared Care Agreements do you currently have in place?
- 3) When presented with a transgender patient that is self-medicating, does your service offer to monitor bloods without a Shared Care Agreement or Bridging Prescription in place? If so, what blood tests are included for those taking feminising HRT and those taking masculinising HRT?
- 4) When a Bridging Prescription is provided, what blood tests are included for those taking feminising HRT and those taking masculinising HRT?
- 5) Bridging Prescriptions are considered a "harm reduction strategy" in transgender healthcare (Royal College of Psychiatrists (October 2013) CR181: Good Practice Guidelines for the Assessment and Treatment of Adults with Gender Dysphoria). Does your

practice/group advise GPs to undertake a patient safety risk assessment before issuing, rejecting or ending a Bridging Prescription?

- 6) The GMC recommends that GPs should collaborate with gender specialists in the provision of transgender healthcare; if the GP cannot access a gender specialist the GMC states "it would not (however), be acceptable to simply refuse to treat the patient" (<https://www.gmc-uk.org/ethical-guidance/ethical-hub/trans-healthcare>). If a GP at your practice/group cannot access the advice of a gender specialist, what is the protocol they will follow?

2. Commissioner's Decision:

A public authority will breach section 10 of FOIA if it fails to respond to a request within 20 working days. Based on the evidence available to the Commissioner, by the date of this notice the public authority has not issued a substantive response to this request. Therefore, the Commissioner finds a breach of section 10.

3. Steps:

The public authority must provide a substantive response to the request in accordance with its obligations under FOIA.

The public authority must take this step within 30 calendar days of the date of this decision notice. Failure to comply may result in the Commissioner making written certification of this fact to the High Court pursuant to section 54 of FOIA and may be dealt with as a contempt of court.

4. Right of Appeal:

Either party has the right to appeal against this decision notice to the First-tier Tribunal (Information Rights). Information about the appeals process may be obtained from:

First-tier Tribunal (Information Rights)
GRC & GRP Tribunals,
PO Box 9300,
LEICESTER,
LE1 8DJ

Tel: 0203 936 8963

Fax: 0870 739 5836

Email: grc@justice.gov.uk

Website: www.justice.gov.uk/tribunals/general-regulatory-chamber

Any Notice of Appeal should be served on the Tribunal within 28 (calendar) days of the date on which this decision notice is sent.

**Information Commissioner
Wycliffe House
Water Lane
Wilmslow
Cheshire
SK9 5AF**