

# BRIGHTON & HOVE CITY COUNCIL BREXIT CONTINGENCY PLANNING



In its first iteration in October 2019 this document was intended to provide an overview of potential risks and issues related to Brexit impacts on Brighton & Hove identified by Brighton & Hove City Council's officer Brexit Resilience & Planning Group (BRPG), with a focus on a 'no deal' scenario and a 31<sup>st</sup> October 2019 leave date. Aligned to each risk or issue was a brief outline of planning or mitigation activity that had taken place to prepare.

In light of the changed planning assumption to exit with a deal on 31<sup>st</sup> January 2020 officers have been asked to provide a brief analysis of activity undertaken since the last report and what changed activity will need to be undertaken in the coming year to prepare the city for the UK's exit from the EU.

Consideration of a potential no-deal scenario will still figure as part of council planning.

Risks & issues have been broken down into council directorates of responsibility and RAG ratings have been provided to assist members and officers in the monitoring and prioritisation process.

Readiness Monitoring Report  
January 2020

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## BHCC BREXIT CONTINGENCY PLANNING - READINESS MONITORING REPORT – December 2020

| Strategy, Governance & Law                     | RAG Status | RISKS & ISSUES   | ACTIVITY & COMMENTS – Oct 2019  | Jan 2020 - Update to potential impacts - activity undertaken since Oct 2019 or needed in 2020  |
|--|------------|--|---|--|
| Coordination of BHCC & city response to Brexit | <b>A</b>   | <ul style="list-style-type: none"> <li>Coordination of the council and city response to Brexit including identifying and mitigating risks through corporate oversight and ensuring this is aligned with regional and county contingency plans being led by the Sussex Resilience Forum.</li> </ul> | <ul style="list-style-type: none"> <li>Brexit Coordination Officer recruited to lead on BHCC response.</li> <li>Established officer Brexit Resilience &amp; Planning Group – weekly meetings and situation reports – cross directorate membership – Linking in with the SRF emergency planning (Establishing command and control arrangements for the lead up to and following Brexit to manage any incidents that may occur).</li> <li>Brexit a Strategic Risk (SR35) – reviewed by BRPG</li> <li>Brexit a citywide risk – reviewed by CMB</li> <li>Cross party Brexit Member Working Group maintaining political oversight of planning through fortnightly meetings.</li> <li>Standing item on weekly ELT/DMT agendas.</li> <li>Chief Executive is designated Brexit Lead – Linking in with SE7 CEX &amp; MHCLG.</li> <li>City Management Board engagement &amp; emergency planning workshop – Key city partners also part of Sussex Resilience Forum contingency planning arrangements.</li> <li>Sussex Resilience Forum is working closely with neighbouring counties including Kent Surrey and Hampshire and also London. This includes reviewing of plans and risks.</li> <li>Weekly Strategic Coordinating Group (SCG) meetings inc. representatives from MHCLG, Highways England and utilities</li> </ul> | <ul style="list-style-type: none"> <li>Brexit Coordination Officer in post until March 2020</li> <li>BRPG and MWG continuing to meet on a monthly basis with meeting frequency kept under review</li> <li>BRPG continuing to complete fortnightly situation reports – shared with senior offices and members with frequency kept under review</li> <li>Brexit Service Readiness checklist to be presented to DMT's Feb/March 2020 – Outlining steps to take during transition period</li> <li>Operation Yellowhammer officially stood down by MHCLG – County contingency planning for no deal scenario stood down – BHCC still maintaining dialogue with SRF partners</li> <li>MHCLG funding to be allocated through council Brexit Budget – Key priorities to be considered by MWG and BRPG</li> <li>Work with partners to be undertaken to benchmark the city's current economic and social status at beginning of transition period and highlight sectors and communities potentially affected. This will enable council and partners to effectively monitor how Brighton &amp; Hove is being affected by Brexit related changes and what possible short/long term planning could be done to best respond. SWOT focus.</li> <li>Work with B&amp;H CofC to coordinate delivery of an engagement event for businesses in the city on how to prepare for UK withdrawal and consult businesses on what risks and opportunities they think may impact the city.</li> </ul> |

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|                                 |   |   | <ul style="list-style-type: none"> <li>• Weekly Working Group Meetings.</li> <li>• Delivery of Sussex wide exercising and training to test plans and preparations.</li> <li>• Current emphasis of work is to ensure lines of communication are open within council and with city partners in order to best escalate, disseminate or develop solutions to emerging issues and to maintain oversight of proposals for Govt funding.</li> </ul>   |   |
| EUSS scheme ID checking service | G | <ul style="list-style-type: none"> <li>• Brighton &amp; Hove residents from EEA are able to apply to the EUSS scheme</li> </ul> | <ul style="list-style-type: none"> <li>• Register Office at Brighton Town Hall delivering service from 2<sup>nd</sup> Oct 2019-Drop in service details available on <a href="#">council webpage</a> and customer points and city advice agencies to signpost. <a href="#">News story</a> also live 1<sup>st</sup> Oct 2019.</li> <li>• Jubilee Library volunteers to also provide service – awaiting delivery of android devices.</li> <li>• Migrant Help are providing regional support to vulnerable EEA residents at drop-in at Voices in Exile.</li> </ul> | <ul style="list-style-type: none"> <li>• Register Office continuing to provide service and details online – 417 service users so far</li> <li>• Jubilee Library also providing service – Awareness of service to raised</li> <li>• Migrant Help continuing to provide advice to vulnerable EU residents.</li> <li>• Migrant Help also holding weekly session at CAB.</li> <li>• BHCC developing fund to assist vulnerable EU residents unable to afford required ID and travel costs to enable them to apply.</li> <li>• Latest EU Settlement Scheme figures released by the Home Office on 7<sup>th</sup> November 2019 show that 9,750 EU nationals in Brighton &amp; Hove had applied to the scheme between 28th August 2018 - 30th September 2019. Of that number 8,070 applications concluded with: <ul style="list-style-type: none"> <li>○ 4,860 granted settled status</li> <li>○ 3,140 granted pre-settled status</li> <li>○ 70 given ‘other’ status</li> <li>○ 1,680 were still ‘in-process’ at the time the data was recorded.</li> </ul> </li> <li>• These figures are released quarterly and will continue to be monitored by the Brexit Coordinator.</li> <li>• Next figures expected early February 2020.</li> <li>• Age and nationality breakdown of local applications available from Brexit Coordinator.</li> <li>• Awareness raising of the EUSS a priority both internally</li> </ul> |

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|                      |   |  |   | and externally for 2020.  |
| Officer Preparedness | A | <ul style="list-style-type: none"> <li>Workforce able to respond to emerging issues within existing plans and everyday business</li> </ul>                           | <ul style="list-style-type: none"> <li>Business Continuity Plans consider potential Brexit impacts – Reviewed at DMT’s with support from Emergency Planning Team.</li> <li>Leadership Network event in Oct to update senior officers</li> <li>Senior officer risk &amp; resilience training in Oct 2019.</li> <li>Senior officer scenario workshop in Oct 2019 to inform further development of Business Continuity Plans and highlight gaps.</li> </ul>  | <ul style="list-style-type: none"> <li>BCP’s to maintain consideration of planning for a no deal scenario</li> <li>Readiness checklist for services to be updated in reference to transition period and shared through DMT’s</li> <li>Risk &amp; resilience training – 2<sup>nd</sup> part training session taking place in Jan 2020 for BHCC GOLD</li> </ul>   |
| Communications       | A | <ul style="list-style-type: none"> <li>Brighton &amp; Hove residents and businesses receive information they require to enable them to prepare for Brexit</li> </ul> | <ul style="list-style-type: none"> <li>Government have launched largescale communications push around ‘Get ready for Brexit’ – BHCC currently focusing on pushing EUSS scheme and linking to partners Brexit comms.</li> <li>Head of Comms part of Sussex Resilience Forum Warn &amp; Inform Group ensuring coherence and consistency in messaging across the county.</li> <li>BHCC adopting parts of campaign to message through social media.</li> <li>On council website front page and public <a href="#">resource page</a> established and kept under review.</li> <li>Brexit comms officer being recruited</li> <li>Trusted sources protocol will be established ensuring messages are objective &amp; reliable – City partners providing messages on areas they lead e.g. CCG – medicines</li> </ul> | <ul style="list-style-type: none"> <li>Letter of Unity from 3 political leaders released in Dec 2019 – Related news story</li> <li>Awareness raising campaign for the EUSS to the city and within the organisation.</li> <li>Developing int. &amp; ext. comms plans including Govt toolkit and digital and physical resources to share in public buildings and through partners and businesses.</li> <li>Scoping proposals around providing immigration advice sessions within the city and with BHCC staff.</li> </ul> |

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| Food Resilience     | A          | <ul style="list-style-type: none"> <li>Residents and businesses unable to access food – shortages and choice limitations particularly for vulnerable</li> </ul>   | <ul style="list-style-type: none"> <li>Supply Chain &amp; Logistics group being developed to understand potential city and county areas of impacts and ensure lines of communication are open to escalate issues – 3 meetings in Oct 2019.</li> <li>Work to begin with Food Partnership on food resilience and planning in relation to no-deal Brexit and the impact on vulnerable residents – this will be developed to include wider future impacts inc. climate change.</li> </ul> | <ul style="list-style-type: none"> <li>BHCC Brexit Coordinator sitting on Food Strategy expert Panel</li> <li>Best practice learning from Lambeth Council being developed for B&amp;H to provide the city with an emergency food plan.</li> </ul>  |
| State Aid           | A          | <ul style="list-style-type: none"> <li>Changes to State Aid rules</li> </ul>  | <ul style="list-style-type: none"> <li>EU rules will be transposed to UK domestic legislation.</li> <li>Information available on how the Competition and Markets Authority (CMA) expects to operate the UK state aid regime in the event of no deal.</li> </ul>   | <ul style="list-style-type: none"> <li>Not clear if EU rules will now be transposed to UK legislation.</li> <li>Currently being monitored and risks and opportunities will be highlighted.</li> </ul>  |
| Electoral Services  | G          | <ul style="list-style-type: none"> <li>Possible General Election</li> <li>Requests for proof of Voter ID from EU nationals seeking settled status</li> </ul>  | <ul style="list-style-type: none"> <li>Electoral Services/SGL DMT keeping situation under review.</li> </ul>  | <ul style="list-style-type: none"> <li>No further issues identified</li> </ul>   |
| Finance & Resources | RAG Status | RISKS & ISSUES  | ACTIVITY & COMMENTS – Oct 2019  | Jan 2020 Update to potential impacts - activity undertaken since Oct 2019 or needed in 2020  |
| Welfare             | A          | <ul style="list-style-type: none"> <li>Support for people in the city from the EU turned down for Universal Credit or other benefits on the basis of right to reside.</li> <li>Without establishing their right to reside - at risk of destitution. Some of whom are council tenants.</li> <li>Needing support through no recourse to public funds budgets in adult social care and children's services.</li> </ul> | <ul style="list-style-type: none"> <li>Welfare Rights Team currently offering advice to residents that are reliant on benefits inc. EU residents.</li> <li>To be kept under review and issues escalated through DMT/Brexit Coordinator.</li> </ul>  | <ul style="list-style-type: none"> <li>Welfare Rights Team continuing to offer advice and signposting EU residents to EUSS support in the city.</li> <li>Further clarity needed on impact of proposed immigration rule changes.</li> <li>Risks and issues will be monitored and highlighted during transition period.</li> </ul> |

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| Procurement                     | G | <ul style="list-style-type: none"> <li>Changes to procurement legislation</li> </ul>  | <ul style="list-style-type: none"> <li>The current procurement legislation will continue to apply.</li> <li>There will be a new UK portal for issuing OJEU notices.</li> </ul>   | <ul style="list-style-type: none"> <li>Last update continues to apply.</li> </ul>   |
| Data                            | G | <ul style="list-style-type: none"> <li>Impact on data flows/GDPR</li> </ul>   | <ul style="list-style-type: none"> <li>Guidance on the ICO website regarding this - <a href="https://ico.org.uk/for-organisations/data-protection-and-brexit">https://ico.org.uk/for-organisations/data-protection-and-brexit</a>.</li> <li>BHCC completed Govt Brexit survey on personal data flow impacts.</li> </ul>  | <ul style="list-style-type: none"> <li>Last update continues to apply.</li> </ul>   |
| Tech                            | G | <ul style="list-style-type: none"> <li>Ensuring continued access to talent;</li> <li>Enabling the movement of tech products and services across borders;</li> <li>Retaining any access to EU funding streams</li> <li>Existing contract renewals</li> </ul> | <ul style="list-style-type: none"> <li>IT&amp;D's contractor list is small in comparison to other organisations, and the specialist skillsets are not an issue as we have made tactical decisions to move away from expensive technologies to support.</li> <li>IT&amp;D currently procuring products through a standard procurement framework.</li> <li>BHCC's largest supplier in terms of expense is/will be Dell, (who ship products from China), if Dell were unable to supply we would have to look elsewhere, Dell have reported in March 19 that they would have enough stock to cover 8 weeks</li> <li>Currently clarifying contracts with Orbis Partner lead.</li> </ul> | <ul style="list-style-type: none"> <li>1 - No Change</li> <li>2 - No Change</li> <li>3 – Sufficient stock now ordered &amp; delivered from Dell and available for deployment</li> <li>4 – Clarification is that procurement frameworks continue to apply for any contract renewals</li> </ul> |
| Workforce: Recruitment          | A | <ul style="list-style-type: none"> <li>Recruitment of future staff in areas with high levels of EU nationals and impact of future immigration legislation</li> </ul>  | <ul style="list-style-type: none"> <li>HR preparing for immediate changes to right to work in the event of no deal.</li> </ul>   | <ul style="list-style-type: none"> <li>HR will continue to monitor developments during transition period and identify impact of expected changes related to new immigration system.</li> </ul>  |
| Workforce: Employment Law       | G | <ul style="list-style-type: none"> <li>Impacts on Employment Laws and rules in no deal scenario</li> </ul>  | <ul style="list-style-type: none"> <li>Monitoring developments – no immediate repeal of UK employment law on withdrawal</li> </ul>   | <ul style="list-style-type: none"> <li>Continuing to monitor developments.</li> </ul>   |
| Workforce: Organisation culture | A | <ul style="list-style-type: none"> <li>Potential increase in race related incidents</li> </ul>  | <ul style="list-style-type: none"> <li>No current concerns and being kept under review</li> </ul>  | <ul style="list-style-type: none"> <li>No current concerns and being kept under review.</li> </ul>  |

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| Workforce: Current staff       | <b>A</b>   | <ul style="list-style-type: none"> <li>Impact on support and retention</li> </ul>  | <ul style="list-style-type: none"> <li>Need to target EUSS support to staff – Guidance on the Wave &amp; will target EUSS scheme ID checking service at Register Office &amp; Jubilee Library once live in Oct 2019.</li> </ul>  | <ul style="list-style-type: none"> <li>BTH and Jubilee Library continue to provide the EUSS scheme ID checking service</li> <li>Internal communications and signposting to EUSS and support to be delivered throughout 2020</li> <li>Work to be developed around understanding the impact of new points-based immigration system on the council workforce.</li> </ul> |
| Economy, Environment & Culture | RAG Status | RISKS & ISSUES   | ACTIVITY & COMMENTS – Oct 2019   | Jan 2020 Update to potential impacts - activity undertaken since Oct 2019 or needed in 2020   |
| EU Funding                     | <b>A</b>   | <ul style="list-style-type: none"> <li>Impacts on current EU funding streams within the city</li> </ul>  | <ul style="list-style-type: none"> <li>If the UK leaves under 'No Deal' some bidding opportunities (currently open until 2020) will cease. Under a 'No Deal' projects in delivery are underwritten by the Treasury, however the mechanism for UK partners receiving the funding is not yet clear for all programmes.</li> </ul>  | <ul style="list-style-type: none"> <li>BHCC International Team will continue to monitor developments through transition period and highlight risks, issues and opportunities. Projects are continuing to be funded.</li> </ul>  |
| Waste Management               | <b>A</b>   | <ul style="list-style-type: none"> <li>Border delays at Newhaven Port have the potential to obstruct access to Newhaven Energy Recovery Facility, where 65% of BHCC municipal waste is treated. Potential knock on effect on moving waste out from Hollingdean Waste Transfer Station</li> <li>Disruption to fuel supplies directly impacts waste collection and disposal activities</li> <li>Business in the city use a wide range of commercial waste operators to collect and dispose of their waste. It is unclear to what extent the private sector is prepared for EU Exit.</li> </ul> | <ul style="list-style-type: none"> <li>ESCC has a contingency plan in place to manage Newhaven Port traffic (additional off-road parking secured).</li> <li>Disruption to markets may financially impact BHCC due to income sharing arrangements in the PFI contract. Veolia does not export any non-recyclable waste.</li> <li>Confident that fuel disruption can be mitigated through bunkered fuel supplies at Cityclean and Veolia Depots</li> <li>DEFRA has stepped up their communications to the waste sector to encourage waste operators to prepare contingency plans.</li> </ul> | <ul style="list-style-type: none"> <li>City clean continuing to monitor developments during the transition period.</li> <li>County Resilience Forum contingency planning stood down by MHCLG with disruption to ports and fuel availability extremely unlikely during transition period.</li> </ul>   |



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| Transport infrastructure | A | <ul style="list-style-type: none"> <li>• Interruptions to fuel supplies and EU drivers could impact public transport, particularly bus services, operations across the city impacting journeys to work, education, tourism and leisure.</li> <li>• Government grants for essential projects and highway maintenance could be interrupted due to these being re-directed or delayed due to Brexit planning.</li> <li>• Interruptions to salt deliveries to Shoreham Port and from the EU could jeopardise Winter Service.</li> </ul> | <ul style="list-style-type: none"> <li>• BHCC Fuel Plan reviewed and updated. All three designated distribution sites for contingency planning have been inspected.</li> </ul>  | <ul style="list-style-type: none"> <li>• Plans developed for no deal scenario will continue to be reviewed as necessary during transition period.</li> <li>• Potential impacts to be monitored during transition period.</li> </ul>  |
| Air quality              | G | <ul style="list-style-type: none"> <li>• As EU directives on Air Quality are already established in UK Legislation there are unlikely to be any Target or Measurement obligations that will be affected by Brexit or any 'no deal' scenario.</li> </ul>   | <ul style="list-style-type: none"> <li>• No action required</li> </ul>  | <ul style="list-style-type: none"> <li>• Transport Team will continue to monitor developments through transition period.</li> </ul>  |
| Economy                  | A | <ul style="list-style-type: none"> <li>• Impact on local workforce/skills levels</li> <li>• Impact on import/export regulations</li> <li>• Impact on city wealth</li> </ul>   | <ul style="list-style-type: none"> <li>• Brighton &amp; Hove has a highly qualified workforce (though highly qualified and highly skilled are not always the same thing) and its productivity is not high, so not a given that we will bounce back quickly. Although our productivity is split between some low productivity service sector jobs and some high value knowledge jobs – so it is not a wholly pessimistic picture.</li> <li>• Brighton &amp; Hove is one of the strongest performing UK cities (third in the country) for service exports, equating to around £12,000 per job, lower only than London and Edinburgh. Again, we don't know the exact impact on service exports, but this is a</li> </ul> | <ul style="list-style-type: none"> <li>• During the spring of 2019 the Greater Brighton Economic Board commissioned a survey of businesses and over 1,500 businesses responded. The survey covered a range of questions designed to assess the relative health of the Greater Brighton business base. Among the key findings of the report were areas relevant to Brexit including the following: <ul style="list-style-type: none"> <li>• At 19%, the proportion of firms that export is broadly in line with national data</li> <li>• Firms in information/ communications, manufacturing and environmental services appear to be most exposed on EU exit, as are those aiming for rapid growth</li> <li>• Very few non-exporters intend to start, mainly due to a lack of products/ services</li> </ul> </li> </ul> |

degree of exposure. It also shows that we have service export strengths and may be more able to adapt than other cities.

- New [Economic Strategy](#) for the city faces the post-Brexit World.
- Linked to the Economic Strategy is a City-Region wide Inward Investment, Trade and Export Strategy. This looks at the city region economy, consider in more detail what the impact of Brexit will be on the trading environment.
- We have worked with our Local Enterprise Partnership on a Local Industrial Strategy that focuses future government investment to address and exploit the problems and opportunities following Brexit.
- BHCC linking to GOV.UK guidance for local businesses on website and sharing details of Govt workshops and briefings with stakeholders – Brighton date 1<sup>st</sup> Oct, Grand Hotel.
- Sussex University – [Hampshire & Sussex Brexit no deal impacts briefing](#)

- EU exit is viewed as more negative than positive, but there is significant uncertainty – and views of longer term impacts are less negative
- Reasons for holding negative views are typically around it leading economic issues, uncertainty, loss of customers or loss of supplier. Those that export or import are more likely to anticipate negative impacts, as are manufacturers and those in administrative/ support services.
- Respondents with positive expectations are most likely to do so due to a belief that it will reduce restrictions on their business, that their business can only get better, or that it will lead to improvements in the economy.
- On EU exit, the findings confirm that those more exposed to European markets or workers are concerned about its impacts. However the high uncertainty and even apathy among many firms suggests that there is still work needed in explaining how to prepare for and manage impacts.
- As a response to some of the issues raised by the survey partners have contributed funds to the new ERDF Business Support Programme which will be launched in the New year. The programme, called the ERDF Business Hot House will offer support services to start-up and established businesses, encouraging innovation, investment in R&D, access to finance and support in leadership & management. BHCC will be managing the business grants programme comprising both capital and revenue grants with the aim of generating sustainable business growth and increased productivity.
- Promotion of the programme is due to start in late January. This is an EU funded project that the government has underwritten. This project will therefore continue to completion despite the UK leaving the EU.

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|              |   |   |   | <ul style="list-style-type: none"> <li>Monitoring the potential sectoral impacts related to the introduction of a new immigration system in 2021.</li> </ul>   |
| Tourism      | A | <ul style="list-style-type: none"> <li>Impact on local tourism sector inc. food and workforce</li> </ul>  | <ul style="list-style-type: none"> <li>Visit Brighton keeping situation under review.</li> <li>Guidance released by EU for UK travellers to the continent in case of no deal. Inc. extra border checks/no EU Health Insurance Card.</li> <li>Govt have published guidance for visitors to the UK:<br/><a href="https://www.gov.uk/guidance/visiting-the-uk-after-brexit">https://www.gov.uk/guidance/visiting-the-uk-after-brexit</a></li> <li>Advice for workers: The Government has confirmed in a no deal scenario that EU nationals can work or study in the UK for up to three months and those who wish to stay longer will need to apply to the Home Office for leave to remain within three months of arrival. Subject to identity, criminality and security checks, leave to remain will be granted for 36 months which will include permission to work and study.</li> <li>Supply chains &amp; logistics task &amp; finish group to include consideration of sector impacts inc. food.</li> </ul> | <ul style="list-style-type: none"> <li>Visit Brighton continuing to monitor developments during transition period.</li> <li>Potential changes to UK immigration system may impact on tourism sector in the city.</li> <li>No clarity yet on exactly how the points based skills system would impact the local workforce but this will be monitored.</li> </ul> |
| Universities | A | <ul style="list-style-type: none"> <li>Loss of funding for research &amp; Innovation including funding post Horizon 2020</li> <li>Impact on the falling value of sterling on EU income</li> <li>Impact on staffing as a proportion of the workforce are EU citizens including academics and European researchers</li> </ul> | <ul style="list-style-type: none"> <li>Sussex University <a href="#">Brexit information</a> resource for staff and students.</li> <li>Brighton University <a href="#">Brexit advice</a> resource for staff and students.</li> </ul>   | <ul style="list-style-type: none"> <li>Last update continues to apply.</li> <li>BHCC will continue to engage with universities through CMB during transition period and highlight risks, issues and opportunities.</li> </ul>  |

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|                                     |            | <ul style="list-style-type: none"> <li>Impact on students who are EU citizens including access to grants and loans post 2020 and a potential fall in new entrants</li> </ul>               |  |  |
| Language Schools                    | <b>A</b>   | <ul style="list-style-type: none"> <li>Impacts on local language schools inc. safety and applications for visas, which may be lengthy and expensive – reducing competitiveness.</li> </ul> | <ul style="list-style-type: none"> <li>Reassurance messaging sent by CET’s team to city’s language schools in relation to hate crimes and reporting and offer of visit to hear concerns.</li> </ul>  | <ul style="list-style-type: none"> <li>Further work to be done to understand the impact new immigration rules could have on language schools in the city. Visit Brighton will continue to monitor developments.</li> </ul>           |
| Health & Adult Social Care          | RAG Status | <b>RISKS &amp; ISSUES</b>  | <b>ACTIVITY &amp; COMMENTS – Oct 2019</b>  | <b>Jan 2020 Update to potential impacts - activity undertaken since Oct 2019 or needed in 2020</b>   |
| Public Health                       | <b>G</b>   | <ul style="list-style-type: none"> <li>NHS emergency preparedness</li> </ul>   | <ul style="list-style-type: none"> <li>Director of Public Health attends and co-Chairs Local Health Resilience Partnership NHS preparedness exercises and meetings.</li> <li>Brexit Coordinator attended NHS South East preparedness briefing Sept 2019</li> </ul>   | <ul style="list-style-type: none"> <li>The Department of Health and Social Care has informed NHS England and NHS Improvement that, for the health and care system, no-deal preparations should cease.</li> </ul>                     |
| 34 Health and Social Care workforce | <b>A</b>   | <ul style="list-style-type: none"> <li>We have a good track record of employing quality EU nationals as staff - anything which impedes this would be a detriment.</li> </ul>               | <ul style="list-style-type: none"> <li>Using CQC guidance on workforce in liaising with providers in Sept/Oct</li> <li>Ensuring staff are aware of EU settled status scheme</li> <li>Information shared with wider provider market</li> </ul>  | <ul style="list-style-type: none"> <li>Workforce is a more general issue and not just Brexit related. There will be specific pieces of work around promoting and supporting the social care workforce over the next year.</li> </ul> |
| Market Stability                    | <b>A</b>   | <ul style="list-style-type: none"> <li>The care market is fragile anything which impacts, such as rising costs and recruitment difficulties will be problematical.</li> </ul>              | <ul style="list-style-type: none"> <li>Along with the CCG well established protocol and procedures in place to deal with provider failure</li> </ul>   | <ul style="list-style-type: none"> <li>Previous update continues to apply.</li> </ul>  |
| Supplies and services               | <b>A</b>   | <ul style="list-style-type: none"> <li>Impact on supply chains and services</li> <li>Impact on Public Health partners and contracted organisations</li> </ul>                              | <ul style="list-style-type: none"> <li>All providers are required to have business continuity plans in place. We have provided specific guidance on specific Brexit implications to ensure providers can incorporate these into their plans.</li> <li>Govt <a href="#">guidance</a> for adult social care providers</li> </ul> | <ul style="list-style-type: none"> <li>Previous update continues to apply.</li> </ul>  |

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| Medicines                            | G | <ul style="list-style-type: none"> <li>• Impact on local supply of medicines</li> </ul>                          | <ul style="list-style-type: none"> <li>• Govt working closely with the NHS and suppliers to make sure medicines and medical products continue to be available in all scenarios.</li> <li>• Advice is to keep ordering repeat prescriptions and taking medicines as normal.</li> <li>• GP's/pharmacies will inform patients of changes.</li> <li>• The government has asked suppliers of medical goods to build up at least 6 weeks' worth of extra stocks above usual level.</li> <li>• It has also bought extra ferry capacity so medicines and medical products will be prioritised for import.</li> <li>• HASC are reviewing this in September in the light of recent developments and are linking with the CCG and SPFT</li> <li>• CCG local messaging - <a href="https://www.brightonandhoveccg.nhs.uk/getting-your-medicines-if-theres-no-deal-brex-it-medicines-information">https://www.brightonandhoveccg.nhs.uk/getting-your-medicines-if-theres-no-deal-brex-it-medicines-information</a></li> <li>• National Audit Office (NAO) <a href="#">assessment published 27/09/19</a> recognises national work led by Department for Health and Social Care to prepare for Brexit including effective work to maintain supplies of medicines. However NAO concludes there remains a significant amount to do before 31 October and the event of a no-deal would create a highly uncertain environment and operating all the elements of the plan would be a hugely demanding task.</li> </ul> | <ul style="list-style-type: none"> <li>• No further action required. Medicine supplies are now being received as usual.</li> </ul> |
| EU Nationals in residential care and | A | <ul style="list-style-type: none"> <li>• The Council currently relies on a number of EU agreements in</li> </ul> | <ul style="list-style-type: none"> <li>• HASC currently seeking clarity on this issue.</li> </ul>   | <ul style="list-style-type: none"> <li>• Previous update continues to apply.</li> </ul>  |

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| receiving other services.                        |                   | relation to British children who are taken abroad and in relation to European children born outside the UK who are looked after by BHCC. In many areas, cooperation between the UK and EU will cease, and the applicable legal regime in many practice areas will change. |   |   |
| Home Care  | <b>A</b>          | <ul style="list-style-type: none"> <li>Impact on travel for home care services inc. fuel and congestion</li> </ul>  | <ul style="list-style-type: none"> <li>We will be reviewing with Transport colleagues to assess the extent to which this will be an issue as a compact City and Home Care providers are organised by geographical area.</li> </ul>  | <ul style="list-style-type: none"> <li>Previous update continues to apply.</li> </ul>   |
| Vulnerable people                                | <b>A</b>          | <ul style="list-style-type: none"> <li>Potential impact on vulnerable people e.g. relating to access to food</li> </ul>   | <ul style="list-style-type: none"> <li>Vulnerable People Plan being reviewed and updated</li> <li>Supply Chain &amp; Logistics task &amp; finish group to look at potential impacts on food and vulnerable people</li> <li>Development of food resilience planning to include consideration of vulnerable people in the city</li> </ul>   | <ul style="list-style-type: none"> <li>Vulnerable People Plan has been updated</li> </ul>   |
| <b>Neighbourhoods, Communities &amp; Housing</b> | <b>RAG Status</b> | <b>RISKS &amp; ISSUES</b>   | <b>ACTIVITY &amp; COMMENTS – Oct 2019</b>   | <b>Jan 2020 Update to potential impacts - activity undertaken since Oct 2019 or needed in 2020</b>  |
| Regulatory Services                              | <b>A</b>          | <ul style="list-style-type: none"> <li>Impacts related to export certification, movement of animals, food safety</li> </ul>   | <ul style="list-style-type: none"> <li>BHCC leading on the Sussex wide Supply Chain and Logistics Cell/Work stream should risks emerge and need escalation through the Sussex resilience Forum</li> <li>DEFRA &amp; Food Standards Agency (FSA) have reviewed advice on fish export certificates and now to be risk based. Provision of 24/7 local authority cover to issue certificates no longer needed in relation to fish business at Shoreham Port.</li> </ul> | <ul style="list-style-type: none"> <li>Resilience Forum contingency planning stood down at instruction of Govt. Plans will continue to be reviewed as necessary.</li> <li>Continuing to monitor developments during transition period – Changes to regulations and local impacts on trading standards/food safety are key and BHCC will need to prepare council services and city.</li> </ul> |

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|   |          |  | <ul style="list-style-type: none"> <li>• Liaising with East Sussex TSD as they undertake our animal welfare work on our behalf.</li> <li>• Identifying those businesses locally who have the need to import/export goods from product safety/food standards perspective</li> </ul>  |  |
| Shoreham Port <i>Also link to Transport</i> | <b>G</b> | <ul style="list-style-type: none"> <li>• Main risk that national custom declaration database does not have capacity and fails</li> </ul> | <ul style="list-style-type: none"> <li>• Retained contact with Shoreham Port who have routine dialogue with DEFRA, HMRC and Port Association.</li> <li>• The port has contingencies in place for holding freight pending customs clearance.</li> </ul>  | <ul style="list-style-type: none"> <li>• Previous assessment for no deal scenario currently no longer applicable and no identified risks during transition period.</li> <li>• Developments will be monitored and issues highlighted as necessary.</li> </ul>   |
| Migrants                                    | <b>A</b> | <ul style="list-style-type: none"> <li>• City may need funding to assist destitute EU nationals to return to home countries</li> </ul>   | <ul style="list-style-type: none"> <li>• Situation kept under review - Brighton &amp; Hove Refugee &amp; Migrant Forum.</li> </ul>  | <ul style="list-style-type: none"> <li>• Previous update still applies. Please see EUSS section for latest information on the scheme.</li> </ul>   |
| Advice (inc. Settled Status)                | <b>A</b> | <ul style="list-style-type: none"> <li>• Shortage of accredited immigration advice in city</li> </ul>                                    | <ul style="list-style-type: none"> <li>• Vulnerable EU nationals drop in sessions delivered by Migrant Help started at the offices of Voices in Exile in Kemptown – BHCC will signpost through customer centres and Register Office.</li> <li>• Register Office providing EUSS ID checks from 2<sup>nd</sup> Oct. Jubilee Library also to provide service. Awaiting android devices to be delivered.</li> </ul> | <ul style="list-style-type: none"> <li>• Scoping for possibility of immigration advice event in the city where residents can ask questions and receive guidance on how to apply to the EUSS.</li> <li>• Awareness raising of EUSS and support a key priority</li> <li>• Brexit Coordinator &amp; Comms Officer messaging for feedback from all stakeholders on the scheme and access to it so they can raise with Home Office.</li> <li>• Unclear if Govt funding for advice for vulnerable EU nationals will continue past March. Issue being monitored.</li> </ul> |
| Community cohesion                          | <b>A</b> | <ul style="list-style-type: none"> <li>• Impact of increased divisions and potential hate incidents in the context of Brexit</li> </ul>  | <ul style="list-style-type: none"> <li>• Community groups have expressed concern</li> <li>• Planning needed for ongoing positive community engagement, for BHCC and police to be communicating with communities, offering reassurance, and to have a presence and communication channels in case of problems</li> </ul>   | <ul style="list-style-type: none"> <li>• Meetings between community safety officers and police will continue to ensure strategic approach to reporting of issues and feed into communications plans around hate crime reporting etc.</li> </ul>  |

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|                |                 |   | <ul style="list-style-type: none"> <li>• Messaging went out to community groups March 2019, and tailored messaging for priority groups including language schools and BHCC staff. This was positively received but due to time lapse needs to be recirculated</li> <li>• Communications channels being set up with Sussex Police to share information and have reach into communities should problems arise</li> <li>• ‘Supporting our communities’ on BHCC Brexit webpage</li> </ul> |   |
| <p>Housing</p> | <p><b>A</b></p> | <ul style="list-style-type: none"> <li>• Additional pressure on housing stock etc. due to returning British citizens from EU (but possible exiting citizens could balance)</li> <li>• Possible changes to eligibility criteria for existing tenants</li> <li>• Possible recruitment issues re repair service</li> <li>• Low income/vulnerable households impacted by rises in food &amp; fuel costs.</li> </ul> <p><b>Existing Property &amp; Investment arrangements</b></p> <ul style="list-style-type: none"> <li>• Materials may present a supply issue for the existing service – particularly around lift parts.</li> <li>• Fuel – this is a broader issue but should there be supply issues this may particularly impact our responsive services across a range of providers.</li> <li>• Staff implications – a number of our sub contractor staff will be EU</li> </ul> | <ul style="list-style-type: none"> <li>• Housing Leadership Team working with all key partners/contractors to ensure preparedness.</li> </ul>   | <ul style="list-style-type: none"> <li>• Developments to be monitored through transition period.</li> </ul> |



|  |            | nationals so there may be implications in terms of staffing levels and impact.   |   |   |
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| Families, Children & Learning                            | RAG Status | RISKS & ISSUES   | ACTIVITY & COMMENTS – Oct 2019  | Jan 2020 Update to potential impacts - activity undertaken since Oct 2019 or needed in 2020 |
| EU national children in care Settled Status applications | <b>A</b>   | <ul style="list-style-type: none"> <li>• EU Settlement Scheme applications – impact on social work time/ capacity – documentation needed</li> <li>• Impact of criminal convictions could affect settled care status</li> </ul> | <ul style="list-style-type: none"> <li>• Numbers of children in care and care leavers requiring support to apply for EU Settlement status scoped and applications being made, overseen by Head of Service. Numbers and process discussed in FCL DMT and shared with Home Office.</li> <li>• No concerns currently identified about the EUSS process (including the scanners for the biometric identity documents) or impact on social work time/ capacity to support. Initial concerns about impact of criminal convictions have so far not borne out. Processes are in place to continue to identify and make applications of EUSS for new children coming into Local Authority care.</li> </ul> | <ul style="list-style-type: none"> <li>• Previous update continues to apply</li> </ul>      |
| Workforce  | <b>A</b>   | <ul style="list-style-type: none"> <li>• Travel in and out of Greater Brighton due to changed border controls</li> <li>• EU Settlement Scheme applications (FCL staff) – Need to target BHCC support</li> </ul>                | <ul style="list-style-type: none"> <li>• Reminders to apply for EUSS distributed via FCL comms and advised further information will be shared by HR.</li> <li>• Covered Brexit preparedness in FCL comms to support workforce to consider any potential impacts on service provision, including travel disruptions in</li> </ul>  | <ul style="list-style-type: none"> <li>• Previous update continues to apply.</li> </ul>     |

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|                                |          |   | <p>and out of work / in and out of appointments / and to social work visits.</p> <ul style="list-style-type: none"> <li>• Covered Brexit preparedness in FCL comms to support workforce to consider any potential impacts on the vulnerable families they are supporting – signposting information shared.</li> <li>• Reminder re reporting hate crimes circulated via FCL comms with general reminder about being unsettling and uncertain times and to ensure each other are well supported, as well as to keep open and transparent with any affected families they are supporting.</li> <li>• BCP's to address cover arrangements / travel disruptions in place for all key services</li> <li>• Central Govt have confirmed that whilst any existing applications for professional qualifications will be completed “as far as possible”. There is no future arrangement for mutual recognition of qualifications; just a promise, with no date attached, that EU and EEA social workers “will have a means to seek recognition of their qualifications”. Uncertainty remains for FCL on this issue.</li> </ul> |  |
| International Child Protection | <b>A</b> | <ul style="list-style-type: none"> <li>• If no deal - Brussels 11a will no longer apply and current DfE advice will be redrawn and LA will need to follow framework of</li> </ul> | <ul style="list-style-type: none"> <li>• Whilst we are aware that there is no guarantee that EU court will recognise/ accept judgments made in UK courts little guidance has come from central</li> </ul>   | <ul style="list-style-type: none"> <li>• Date update - Some uncertainty around this issue. Further guidance is expected on entering a transition period.</li> <li>• In the now unlikely event of a no-deal Brexit, we</li> </ul> |

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|                            |          | 1996 Hague Convention instead   | <p>government about this. Our agreed plan is to continue to seek independent legal advice on existing and new cases.</p> <ul style="list-style-type: none"> <li>We recognise that LAs exchanging data with partners in other countries “may need to make changes ahead of the UK leaving the EU to ensure minimal risk of disruption”. However, there is no specific advice just a referral to a standardised guide on leaving the EU without a deal – 6 steps to take from the Information Commissioner’s Office designed for businesses. Again, some uncertainty around this issue.</li> <li>We understand the UK will no longer be part of the Common European Asylum System (the Dublin Regulation) if there’s a no-deal Brexit.</li> </ul> | <p>understand the UK will no longer be part of the Common European Asylum System (the Dublin Regulation) so would require further central government guidance on that.</p>                                 |
| Health, SEN and Disability | <b>A</b> | <ul style="list-style-type: none"> <li>Supply of food in residential/ day services settings</li> <li>Services where patients visit/live – any needing medical equipment/ devices/ medicine</li> </ul> | <ul style="list-style-type: none"> <li>We are taking a sensible approach to ensuring there is an adequate supply of food and over the counter medicines in residential/ day services settings</li> <li>BCPs have been updated for all residential and day settings Services</li> <li>Support staff in residential and day settings Services are being supported to apply for EUSS</li> </ul>  | <ul style="list-style-type: none"> <li>Previous update continues to apply.</li> <li>Senior staff are identifying and ensuring service users (adults with learning disabilities) apply for EUSS.</li> </ul> |
| Education & Skills         | <b>A</b> | <ul style="list-style-type: none"> <li>Food supply – provision of school meals –</li> </ul>   | <ul style="list-style-type: none"> <li>Brexit guidance: preparations for schools in England shared with all schools by</li> </ul>   | <ul style="list-style-type: none"> <li>Previous update continues to apply.</li> <li>Schools have been well informed in terms of</li> </ul>   |

- Access to education for EU nationals
- Home to school transport – risk is traffic needs/ disruptions/ congestion (DfE advise this is more of an issue than fuel shortages)

Head of School Organisation with prompts to do the following:

- Contact their food supplier(s) if they procure food directly to ensure they are planning for 31 October.
- Continue with their normal arrangements for medical supplies to support pupils with health conditions. Advised that if they have any concerns about being able to meet statutory duties relating to SEND, health and safety, or safeguarding, to make Head of School Organisation immediately aware
- recording any Brexit impacted absence using code Y
- advising schools to do everything in their power to remain open
- Secondary, all-through schools and schools with sixth forms to make every effort to ensure that examinations for all pupils go ahead as usual.
- notify Head of School Organisation if school sustainability is affected in any way – including any reductions in request for school places by EU families
- notify Head of School Organisation if there are any concerns about foreign language capacity and general loss of EU capacity and talent
- notify Head of School Organisation if there are any concerns about recognition of professional qualifications and

continuing to prepare for any overseas trips with learners.

- declining numbers of teaching staff
- review their current data protection contracts and policies before 31 October to ensure that they have the correct Standard Contractual Clauses (SCC) or other Alternative Transfer Mechanisms to continue to legally receive and process personal data from the EEA
- share FAQ's for parents
- The Head of School Organisation has shared the following guidance with school meals service provider Caterlink [www.gov.uk/guidance/the-food-and-drink-sector-and-preparing-for-eu-exit](http://www.gov.uk/guidance/the-food-and-drink-sector-and-preparing-for-eu-exit) and instructed them to conduct stress testing and have a robust BCP in place. Reassurances received that FSM won't be affected. FCL rep attending Supply Chain & Logistics task & finish group
- Home to School Transport will continue to be monitored and managed, in line with any emerging city transport risks.
- Guidance on Brexit: preparations for further education and apprenticeship providers shared Acting Head of Skills
- Relevant staff attending Supply Chain & Logistics task & finish group e.g. school meals catering

RAG rating criteria aligned with Sussex Resilience Forum emergency planning protocol to allow consistency in sharing of risks and issues:

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| <b>RED</b>   | <p><b>SITUATION:</b> The issue is having a strategically significant impact; normal council/city business has been significantly affected.</p> <p><b>RESPONSE:</b> The response is at or has exceeded the limits of capacity or capability, and further resources are required.</p> <p><b>FORWARD LOOK:</b> The situation is expected to either get worse or remain at this level for the short to medium term.</p>  |
| <b>AMBER</b> | <p><b>SITUATION:</b> The issue is having a moderate impact with strategic concern; normal council/city business has been affected, but the situation is being effectively managed.</p> <p><b>RESPONSE:</b> The response is being managed, at this time, within current resources and through contingency plans and/or coordinated corrective action.</p> <p><b>FORWARD LOOK:</b> The situation is not expected to get any worse in the short to medium term although some disruption will continue</p> |
| <b>GREEN</b> | <p><b>SITUATION:</b> There is limited or no strategic impact from the issue; normal council/city business has largely returned or is continuing.</p> <p><b>RESPONSE:</b> Ongoing response is being managed and within the capacity of pre-planned resources.</p> <p><b>FORWARD LOOK:</b> The situation is expected to improve with residual disruption being managed.</p>  |