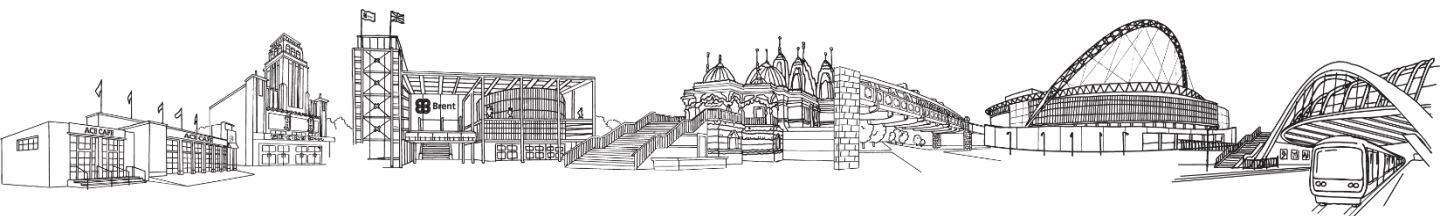


Brent Council Brexit risk assessment



This is a working document and subject to change. If quoting from this document, the date should be stated, and the caveat included that this is a working document subject to change

Last updated: 01-Nov-2019

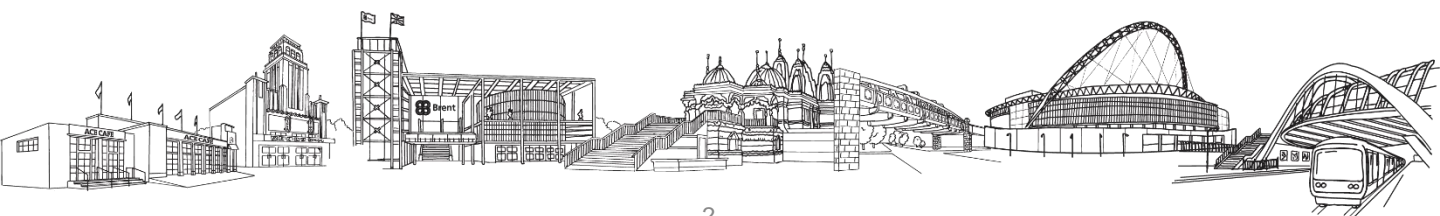


Contents

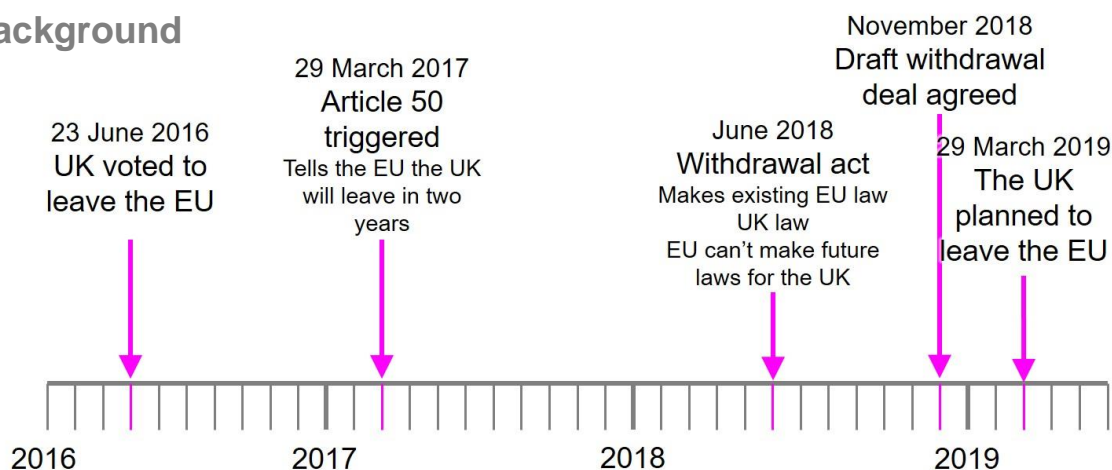
Background

In detail:

1. [Workforce](#)
2. [Statutory services: Social care](#)
3. [Statutory services: Children and young people](#)
4. [Regulatory services](#)
5. [Supply Chain](#)
6. [Local partnership working](#)
7. [Community engagement](#)
8. [Regional and local growth](#)
9. [Data and information handling](#)
10. [EU settlement scheme](#)



Background



On 23 June 2016, the UK voted in a referendum to leave the European Union (EU). Brent did not vote the same way as the country, with 60% of the electorate voting to remain.

On 27 March 2017, the Prime Minister triggered article 50, beginning the formal two-year process for leaving the EU.

The UK intended to leave the EU on 29 March 2019. On Thursday 21 March the EU agreed the UK could extend their membership of the EU to give the UK time to agree an exit process. In July 2019 Mr Johnson became Prime Minister of the UK and pledged that the UK will leave the EU on 31 October 2019 with or without a deal. This has now been extended to 31 January 2020.

If we leave with a deal, there will be an implementation period. This will not be the case with a no deal.

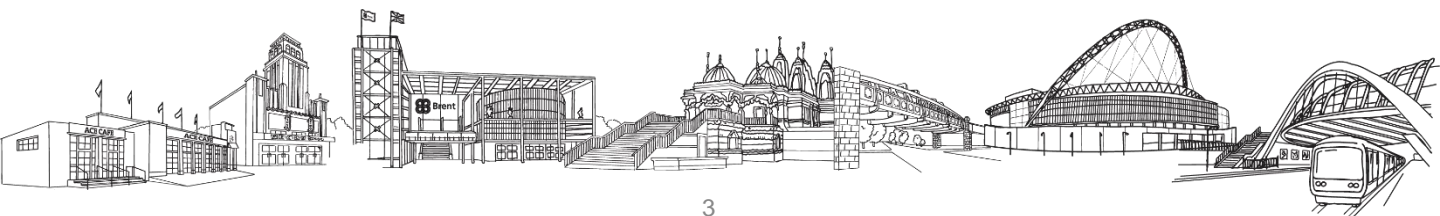
Brent has the largest EU population in London, with 66,000 EU nationals living here. Our EU residents contribute to our society in many different ways, working for the council, our health services, and in other industries such as construction, and hospitality.

Leaving the EU will have a big impact on us, on our businesses, and on our communities, and there are many risks involved.

The Government has recognised that leaving the EU will impact local authorities, and has assigned a sum of money, which it has distributed, to the local authorities in the UK. We have set aside our allocation and will use the Brexit Co-ordination group to recognise how leaving the EU impacts on Brent and determine how the money should be used.

In August 2019 the Government asked each council to designate a Brexit lead to work with central government and oversee teams in every community who will work with stakeholders in their area to plan intensively for Brexit. In Brent, the Brexit lead is the Assistant Chief Executive, Peter Gadsdon. The Government also announced £20 million more funding for councils to prepare for a no deal Brexit, but has not yet provided details of how this funding will be allocated.

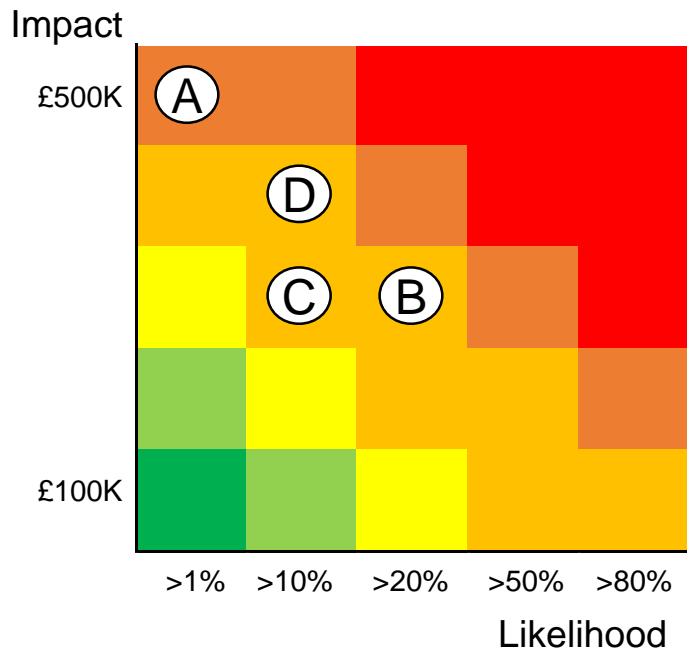
On Thursday 12 December, there will be a general election in the UK. We do not know what the outcome of this election will be, but whatever happens, it will affect how the UK leaves the EU.



1. Workforce

Key threats:

- A. Immediate loss of proportion of current workforce across all sectors
- B. Inability to recruit to hard to fill positions as they become vacant due to natural progression
- C. Skills shortage
- D. Wages increase

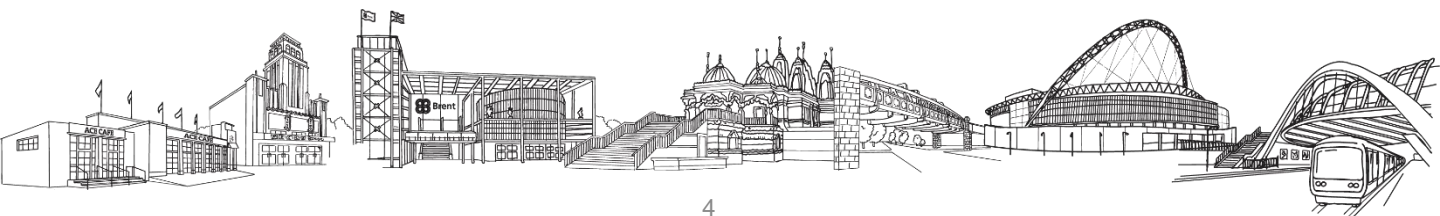


Key opportunities:

1. EU settlement scheme for current EU residents to continue to live and work in Brent
2. Opportunity to upskill current workforce through adult apprenticeships
3. Targeted young people apprenticeships opportunities for young people

Actions:

1.	Promotion of the EU settlement scheme to all staff, and to the public including what it is, how to apply, and what is required
2.	Work with specialist organisations to promote the EU settlement scheme to the harder to reach population
3.	Develop a more complete profile of Brent Council's European staff
4.	Extend the range of apprenticeships in departments and services where there are known recruitment and retention difficulties
5.	Work with the local businesses board to identify skills shortages and apprenticeship opportunities
6.	Work with Brent Works to develop an employment strategy for jobs at risk of not being filled when current employees move on
7.	Meet with our largest employing service contractors to discuss workforce and other Brexit risks



Overview

In Brent, 66,000 residents are EU nationals. These EU nationals make up a large proportion of our workforce, both in the council, in provider services, and in other partner agencies. As the UK leaves the EU, there is a risk that some of our EU residents will leave Brent, and another risk that in the future, EU nationals will not want to, or be able to, come to the UK.

Around 10% of Brent Council employees are originally from the EU. The proportion varies by department and service area with some service areas having one or two EU staff, increasing to around 20% in others. Customer Services and CYP have the highest proportion of employees from the EU. It is worth noting that although employees may be from the EU, many have become British Citizens, or have indefinite leave to remain.

Brent also has a number of contracts with large companies, including with Veolia, who provide the waste and recycling service for Brent. Over half (52%) of the Veolia workforce, and around 70% of its agency staff are from EU countries, and despite paying the London Living Wage, they anticipate it being difficult to attract workers should this source of labour lessen. In August 2019 Veolia reported they were starting to notice a lack of availability of casual labour from Europe. Although details around migration policies is unknown, unskilled migrant workers may be allowed into the country without a job on a year long visa. Currently, the contract comes to an end in March 2023, and the new contract will be commissioned at the height of post-Brexit uncertainty. A construction company who is a large employer in Brent has noted that to date (August 2019), they have not seen a substantive drop in their eastern European workforce. But they have found it noticeably harder to recruit this year and suspect Brexit as having an impact on the availability of new people.

There are other organisations in Brent where large proportions of the workforce are European. These include the hospitality and construction industries.

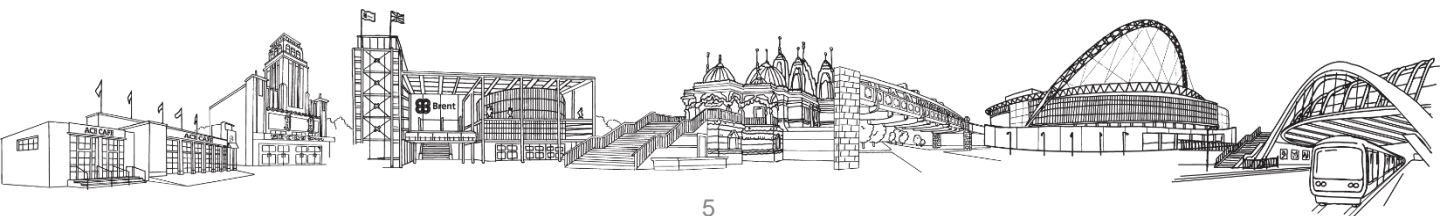
In detail

Loss of workforce

It is unlikely that all European staff and residents in Brent will leave immediately. Some residents however may choose to return to Europe. Residents who do make this decision may have already left, and indeed there is evidence that this has happened. Our schools measure the number of pupils that qualify for the English as an Additional Language (EAL) measure in reception and year one, and last year, this had fallen by nearly 10%, suggesting that some residents may have already chosen to leave. This small migration has not impacted our services, but a larger or continued one might.

If there is a sudden loss of workforce, this risk is planned for in the short term within Brent's business continuity plans. These are intended to bridge an operational gap in staff resource due to (for example) an influenza pandemic and would not be designed to deal for any length of time with a systemic stress like a chronic skill shortage, e.g. nurses or social workers.

We will meet with our suppliers who employ large workforces to ensure continued joint working and continuity measures. We will share EU settlement advice with the business community, and are preparing a 'temperature check' questionnaire for local businesses via the business groups, on how they are preparing for Brexit and key areas of concern, such as import/export and workforce.



EU workforce

Brent Human Resources has plans in place to identify the EU citizens it employs, and raise the awareness of the settlement scheme throughout the council. HR have put in place a temporary system to capture nationality (passport) details of new starters in a spreadsheet. This process has been running since late December 2018. It is not ideal, and implementing a process where this information is captured on Oracle would be a better long term fix.

Our registration service provide a chip and check service to Europeans who wish to register on the scheme but do not have access to an android smart device. Employees can take advantage of this verification service.

There have been a number of lunch and learn events for staff to find out more about the EU settlement scheme.

We are communicating with our businesses in Brent through our business board and newsletter, which regularly contains information about the EU Settlement Scheme. We are also going to write to all our businesses with the annual business rates request to make sure they are aware of the EU Settlement Scheme and our offer to businesses.

Recruitment and retention

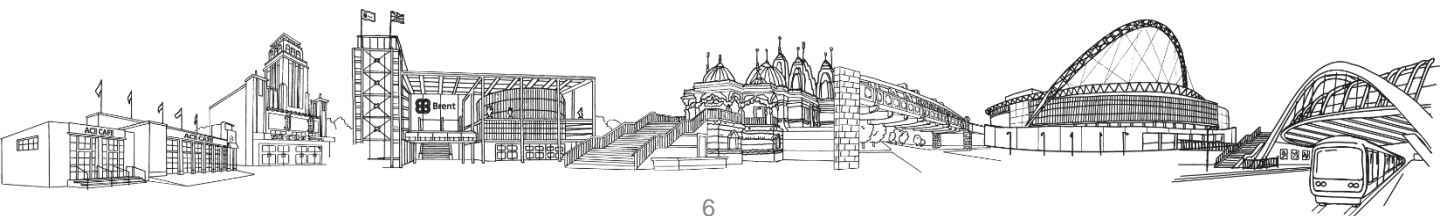
Although it seems there will be no immediate pressure on services through staff shortages, this may present challenges in the future, particularly for roles that are hard to fill, such as those in social work. As it becomes harder for EU citizens to work in the UK, and people naturally progress to other jobs, it could become even harder to fill these positions

As part of the council's learning and development proposition, a plan is currently being developed for learning and development activity for the Strategic Priority category. This will include extending the range of apprenticeships in departments and services where there are known recruitment and retention difficulties – or where these are anticipated – to mitigate against the risk of staff shortages whilst at the same time offering career development opportunities for staff.

The new immigration bill is currently being discussed in Parliament; it is likely to treat EU and non-EU migrants in the same way, and may have requirements for a job offer with a minimum wage but this has not yet been agreed. Although free movement as we know it today will stop, people will still be able to come and live and work in the UK, but their rights may be different.

We will work with Brent Works, our job and apprenticeship brokerage service, to promote appropriate apprenticeships and fill vacancies by recruiting from the local labour supply. The apprenticeships required will be identified by ongoing analysis of local, sub-regional and/or London sector trends as well as through qualitative feedback from the business community.

Following a Partners for Brent Brexit event, our Employment and Skills department will work with United Colleges and the Department for Work and Pensions (DWP) to look at engaging with businesses whose workforce is being impacted by Brexit and creating pathways for college students into job opportunities as well as exploring the possibility of retraining vulnerable groups from the work and health programme.



2. Statutory services: Social Care

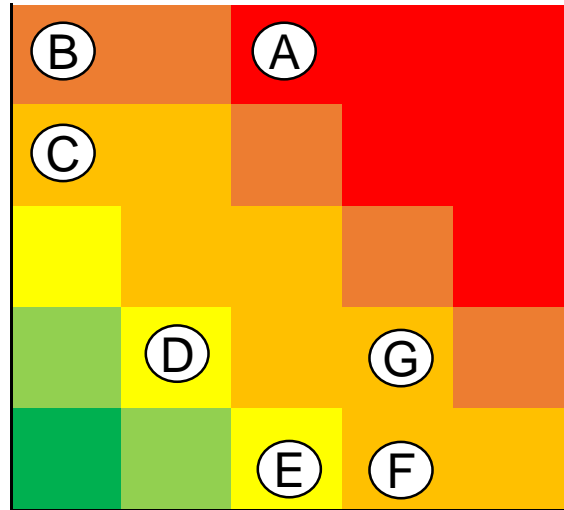
Key threats:

- A. Failure of care provider
- B. Medicines and vaccines shortages
- C. Shortage of medical devices and clinical consumables
- D. Professional regulation implications causing workforce shortages
- E. Difficulties for providers in retaining and recruiting staff
- F. Deterioration of availability of providers
- G. Gradual decline in quality [of services provided], as staffing issues develop

Impact

£500K

£100K

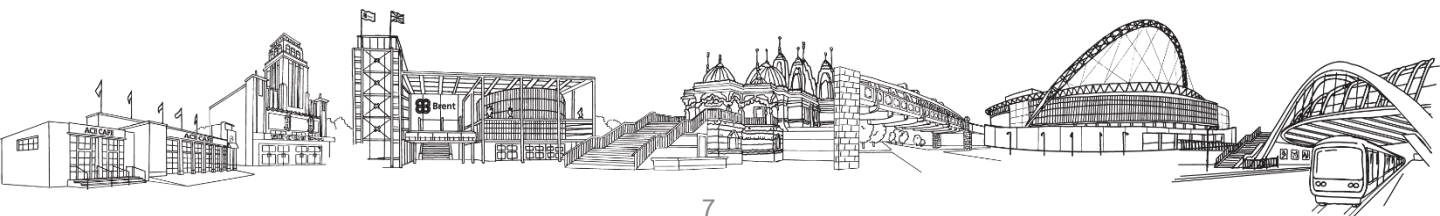


>1% >10% >20% >50% >80%

Likelihood

Actions:

1.	Keep up to date with and continue to follow advice and guidance from the Department for Health and Social Care and the Department for Education
2.	Communicate with local providers, and escalate any concerns immediately to the Department for Health and Social Care and Department of Education
3.	Increase contact with suppliers and request their business continuity plans
4.	Promote the Secretary of State's message: healthcare providers should not stockpile medicines beyond their business as usual stock levels, and no clinician should write longer prescriptions for patients. The Department's UK-wide contingency plan for the supply of medicines and vaccines is being developed alongside pharmaceutical companies and other government departments.
5.	Promote the EU settlement scheme to all providers and encourage them to support staff in applying to the scheme. Promote Brent's chip and check service to help people apply to the scheme.
6.	Write to social care providers re-iterating government advice and the EU settlement scheme, and asking providers to share their business continuity plans with us
7.	As contracts come up for re-procurement, consider the viability of paying the London Living wage
8.	Encourage providers to complete and return the National Minimum Data Set which provides central government with an overview of the adult social care workforce so that any trends in the workforce can be picked up and addressed



Overview

Adult Social Care provides a range of support and care services for our most vulnerable adult residents. These residents may not be able to look after themselves, and may have very poor health.

Children's Social care provides a range of support for our most vulnerable children, including Looked After Children and will have to identify and register any EU citizens in their care on the EU settlement scheme.

The Department for Health and Social Care has provided Brexit preparedness advice. This comprehensive advice covers key areas, including:

- Risk assessment and business continuity planning
- Communication and escalation
- Supply of medicines and vaccines
- Supply of medical devices and clinical consumables
- Supply of non-clinical consumables, goods, and services
- Workforce
- Professional regulation
- Reciprocal healthcare
- Research and clinical trials
- Clinical trials and clinical investigations
- Data sharing, processing and access
- Finance

In detail

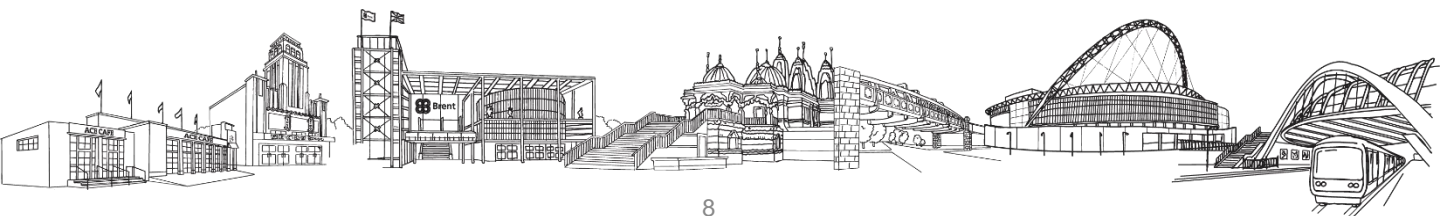
Care providers

There are a number of different organisations providing different levels of care and support to children and adults. These providers range from large organisations, providing care in many different boroughs, to very small organisations providing specific local care. With this large number of care providers all providing different specialist care, Adult Social Care and Children and Young People have provider failure as a risk in their standard business continuity plans.

The other associated risk with care providers is the numbers of EU nationals on their workforce. Brent Council has already raised awareness of the EU settlement scheme to all providers and encouraged them to support their staff in applying to the scheme.

We have written to their care providers twice raising awareness of issues related to Brexit. They have also requested that care providers share their business continuity plans with the council.

We are also working to identify our most vulnerable residents and the care support they receive. If a service provider were to fail, we would know which of our most vulnerable residents would be affected and would be able to ensure they receive the care they require.



In detail continued

Medicines and Vaccines

One whole section of the guidance issued by the Department for Health and Social Care covers medicines and vaccines. The government has implemented a nationwide approach to ensure there is no shortage of medicines and vaccines due to Brexit. Pharmaceutical companies that supply the UK with prescription-only and pharmacy medicines from, or via, the EU or European Economic Area (EEA) have been asked to ensure they have a minimum of six weeks' additional supply in the UK, over and above their business as usual operational buffer stocks, by 31 January or the date the UK leaves the EU. Companies were also asked to make arrangements to air freight medicines with a short shelf life, such as medical radioisotopes. Government funding has been made available for companies that need additional storage for these stockpiled medicines. The government is also making plans around delays at ports, etc. The government has all other health and care providers not to stockpile their medicines, and to reassure patients there is no need to store additional medicines at home.

Within ASC, we have written to all providers to remind them of this advice, particularly care home providers that may feel it is appropriate to stockpile medication for their residents. This isn't required and they have been reminded that they need to follow national guidance.

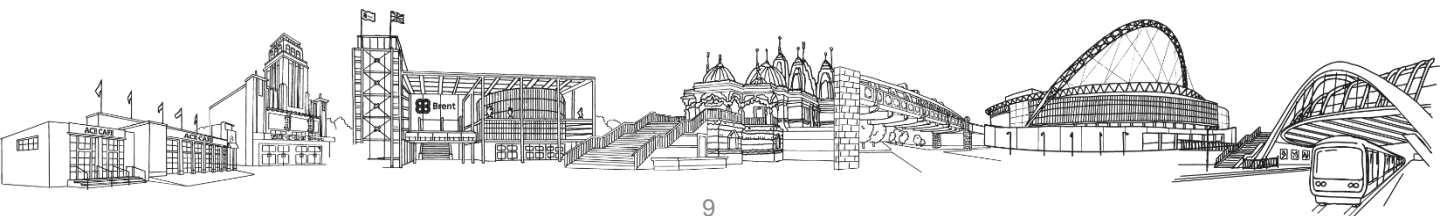
Children and Young People are contacting all providers of care at home services and relevant residential settings to remind them that they need to follow national guidance and not stockpile medication.

Professional regulation

Anyone whose qualification has been recognised and who are registered in the UK before 11pm on 31 January 2020, or the date the UK leaves the EU, will continue to be registered after this point. Anyone who has applied by this time will have their application concluded under current arrangements. Following this date, the arrangements are currently undecided. The government has not provided anymore information about this.

Longer term

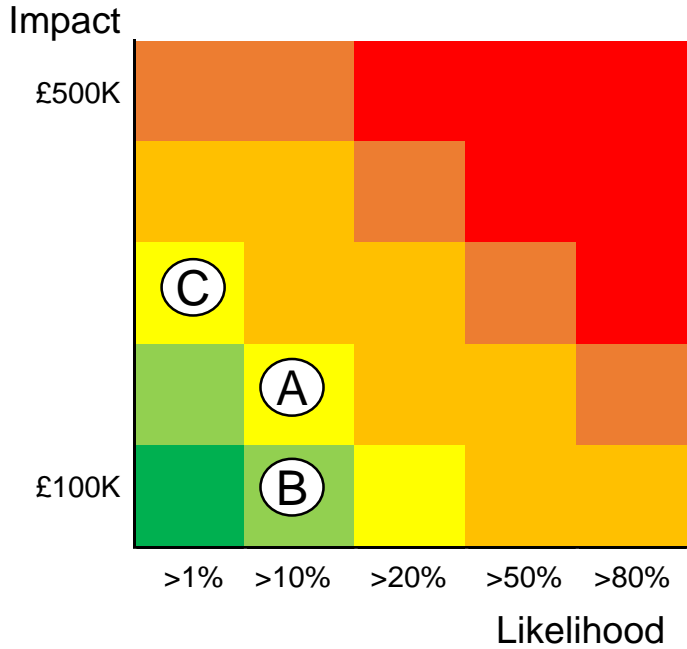
After the UK leaves the EU, the effects may be felt in the longer term with the numbers of EU Nationals (and other foreign nationals) working in social care potentially declining and providers finding it harder to recruit to vacant posts. Already social care has recruitment issues and Brexit could exacerbate these problems. This could have an impact on the quality of care the providers are able to deliver and ultimately on the viability of some providers if they are not able to manage these challenges. It is a real, longer term risk that the quality of care staff could decline as fewer skilled workers are enticed to the UK. We will work with our providers locally and national organisations such as Skills for Care to develop an action plan to address workforce issues in the sector.



3. Statutory services: children and young people

Key threats:

- A. Families leaving the UK impact on the school roll
- B. Recruitment and retention of school staff
- C. An increase in Free School Meal requirements

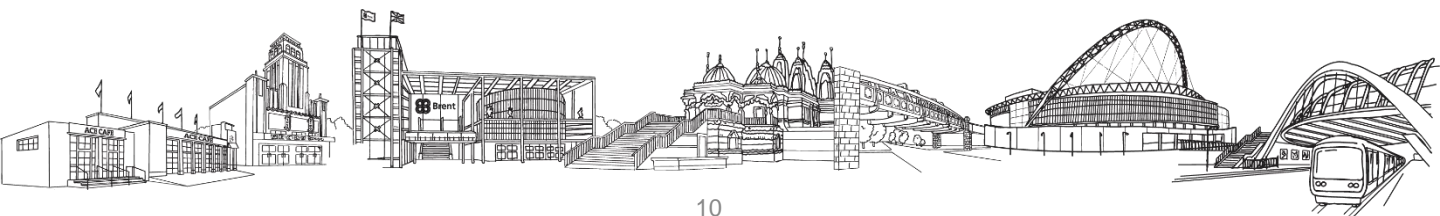


Key opportunities:

- 1. Promote the EU settlement scheme to parents through schools

Actions:

1.	Promote the EU settlement scheme to schools
2.	Work with schools whose pupil numbers are projected to fall
3.	Prepare for an increase in free school meals
4.	Register children in our care on the EU settlement scheme



Overview

Schools are their own businesses, and the council monitors and supports them, but does not run them.

In Brent there are 85 schools: [2 All-through, 4 nurseries, 60 primaries, 2 PRUs, 13 secondaries, and 4 special schools], with 48,249 pupils on the roll.

Pupils come from all different backgrounds. There are 5,500 pupils (13%) who speak European languages as their main language. Many of these children will be EU nationals.

As well as the government-funded schools, Brent is home to Lycee International de Londres Winston Churchill, a private school following the French national curriculum. This school provides education for pupils from all nationalities, and has many French students.

Brent has the third lowest average wage in London, and one third of its children are estimated to be living in poverty. Brexit may increase the cost of living, pushing these families further into poverty.

In detail

Schools in Brent have a large proportion of EU students, which reflects the local community. Last year there was a dip in the number of school places required for reception and year one. The latest (2019) school place projections suggest a gradual increase in primary place demand over the next eight years, a change from the GLA's 2018 projections. The change is due to a higher number of children per new housing unit being assumed than previous years, which has uplifted forecasts. The latest GLA forecasts suggest that Year 7 intakes will be lower than previously forecast. However, locally a number of Primary schools have experienced a reduction in pupils starting school in Reception and currently. The number of pupils that qualify for the English as an Additional Language (EAL) measure in reception and year one has fallen by nearly 10%.

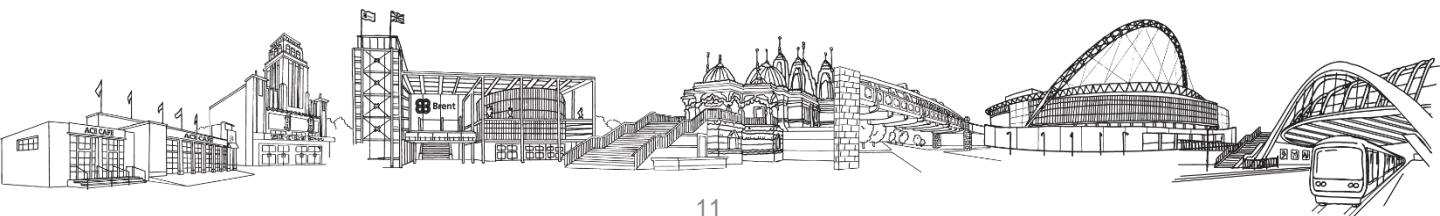
Although schools are responsible for their own budgets, and managing their staff, the council is working with schools adversely affected by the drop in pupil numbers, putting plans in place to mitigate the financial risks associated with changing pupil numbers for example agreeing short-term caps on admission numbers.

It is worth noting that the National Funding Formula, which calculates how much funding each school receives is based on the number of pupils, the characteristics of the intake of pupils and a few school and local-level factors. Lower pupil numbers will result in less funding for the school.

Any child living in the UK can apply for and access a school place in England irrespective of migration status. This will continue after our exit from the EU.

Information sessions about the EU settlement scheme have been offered to schools and a number of schools have already taken advantage of this offer.

Some experts have predicted that Brexit will negatively affect the value of the pound, and the economy. These experts say that long-term, the economy will be expected to grow, but more slowly than expected before Brexit. This and other factors will affect the viability of businesses which could lead to job losses. If this happens, more children may be eligible for free school meals.



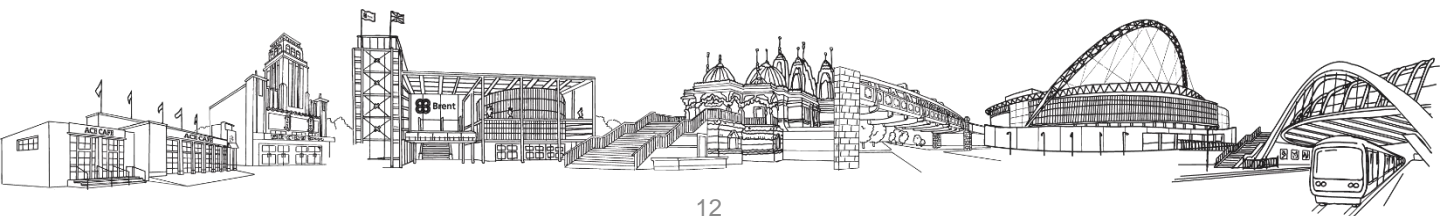
In detail continued

The value of the pound and new importing arrangements could impact on food and prices may rise. If this happens, schools providing meals may find there is a cost increase in providing these meals.

Current child protection regulations are not enshrined in UK law. These will revert to previous arrangements should the UK leave the EU without a deal. Staff will then need to be trained on the changes to these regulations.

Local Authorities are responsible for identifying EU Looked After Children and Care Leavers and ensuring they are registered on the EU settlement scheme. We are supporting the young people in our care, providing additional support where required and monitoring this regularly at Operational Children's Service Leadership Team meetings.

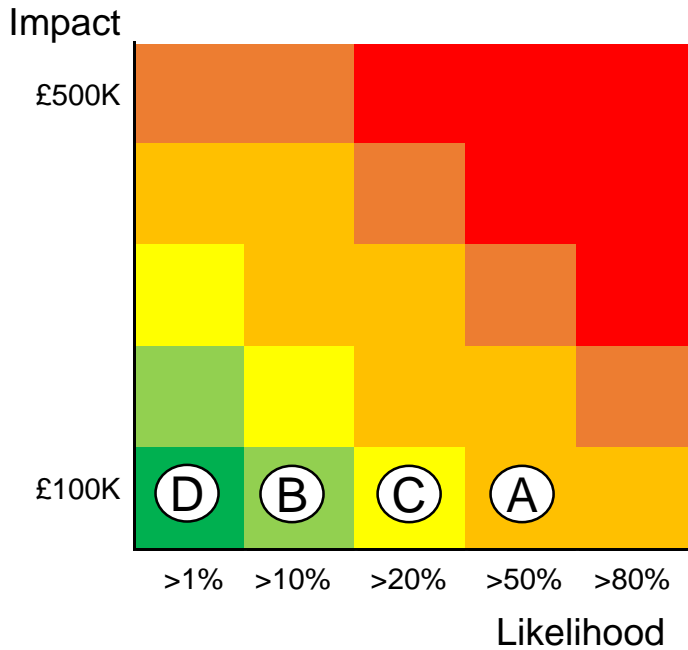
We are supporting Brent children and young people to participate in the University of Liverpool Home office funded project: "Creating Child Friendly Information about the EU Settlement Scheme" which is aiming to create information materials that can be used by children, their parents, and other adults to help children understand and apply for status under the EU Settlement Scheme.



4. Regulatory services

Key threats:

- A. Implementing and understanding changes in legislation
- B. Lack of clarity for changes to the current reciprocal arrangements with the EU
- C. Cost pressures due to increased demand from businesses
- D. Cost pressures due to re-training requirements

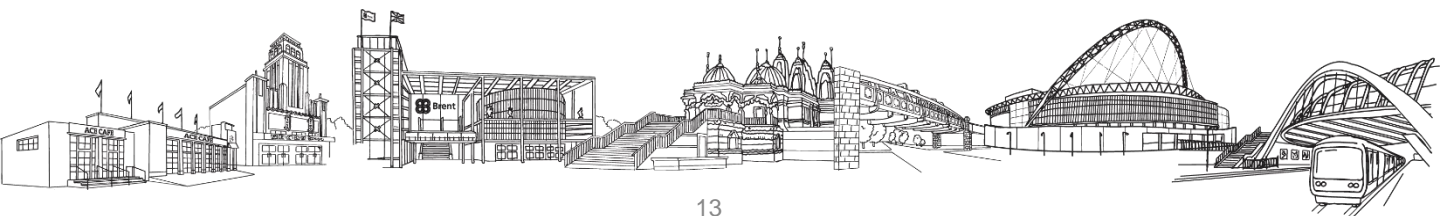


Key opportunities:

1. Raise awareness and understanding of new laws/standards/checks with businesses once decisions have been made centrally

Actions:

1.	Keep in close contact with Central Government for updates on any changes in legislation
2.	Communication campaign to ensure businesses are aware they will still have to comply with EU law, as we are adopting it



Overview

EU laws affect a wide variety of the council's activity. The European Union (Withdrawal) Bill will enshrine all existing law into UK law at the point of Brexit, following which this will be reviewed and amended by Parliament. Additionally, secondary legislation will be used by ministers to amend these laws where necessary for them to work post-Brexit, e.g. to set up replacement processes or bodies.

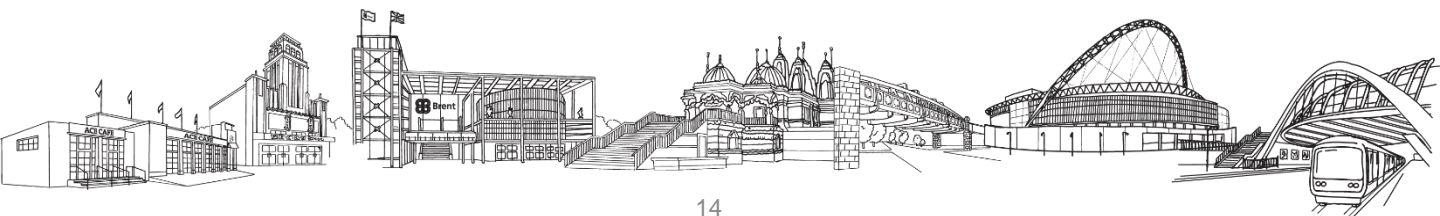
Under the terms of the draft Withdrawal Agreement, the UK would continue to be bound by the EU legal and regulatory framework (including the ECJ) until the end of the transition period – 31 December 2020. Non-regression requirements in the agreement will also prevent the UK from bringing in lower standards on social, environmental and labour regulations.

In detail

Government have started putting forward a significant number of 'correcting powers' or statutory instruments to ensure a functioning statute book after Brexit. This will require extra work/training for staff understanding these changes and how they apply. Similarly, businesses will be asking us for help and advice and we will need to increase inspections etc. to ensure awareness and compliance, all of which will increase demand for our regulatory services. There is still a lot of work to do for the law changes to go through so the current position is changing week by week. It is hoped the new laws will simply fix the changeover rather than making any significant changes to the content of the legislation.

However, in the event of a no deal situation, there are many regulatory functions where it is not clear how they will work. This causes particular issues where the UK relies on reciprocal arrangements with the EU such as market surveillance, placing goods on the market, CE conformity marking, etc.

In anticipation of increasing demand for our regulatory functions and the need to retrain the entire regulatory workforce on post Brexit law changes, a suitable training programme will need to be introduced and implemented, and staffing capacity may need to be increased. This will provide an additional cost pressure.



In detail continued.

There is an expectation that our colleagues in port authorities not being able to cope with the checks and controls that will be placed on them in the event of a no deal. Governments wants to keep goods moving through the system to prevent delays and backlogs. This will mean that many non compliant goods which would have been previously stopped at the ports, will now be allowed through and local authorities being notified of there intended destination and expected to then intervene with the shipments once they have arrived. It's agreed there won't be any increase in risk profile of goods, but there is likely to be an increase in us having to remove goods from the market place that previously would have been detained at the ports. This will be of particular note to many of Brent's importer businesses.

Providers may be affected by changes in the law, and as a result may not be able to deliver their contract within the currently agreed price. There will be clauses that will allow adjustments to the contract on an annual basis related to inflation and/or allow both parties to discuss additional costs that need to be borne by contracted parties due to government legislation.

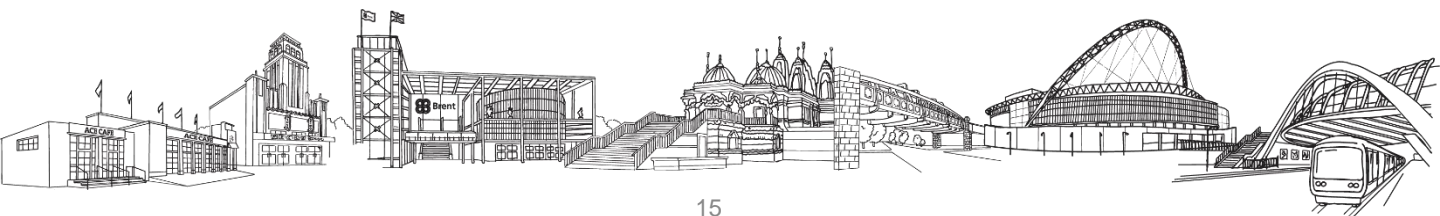
From a waste perspective, advice from DEFRA suggests that 98% of waste exports are expected to be largely be unaffected and Veolia also have not raised any concerns.

After the UK leaves the EU it could become more difficult to recover parking contravention debt from vehicles registered in EU countries. It is already difficult especially in respect of Romania, but our specialist debt recovery contractor does have some success.

Any fuel shortage or public disorder could impact heavily on parking enforcement and revenue.

Long term the main issue would be a significant hit on car ownership caused by higher import tariffs and a possible collapse in domestic production.

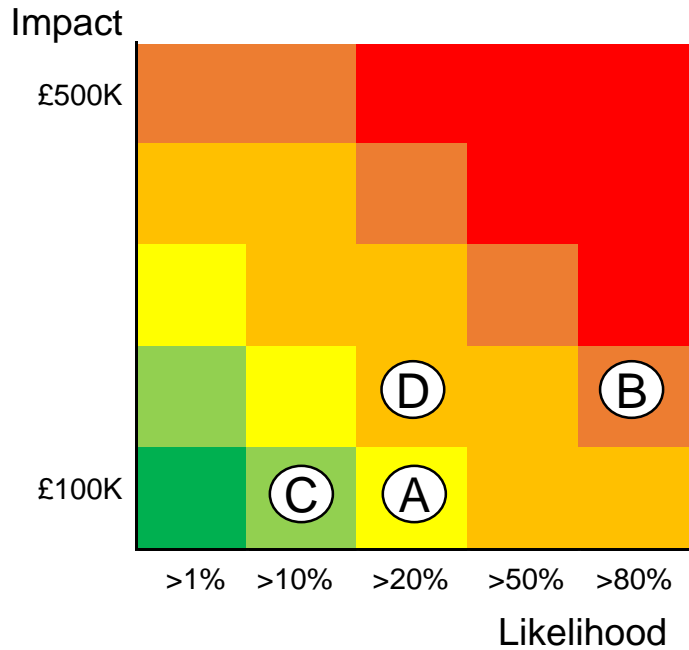
This would affect permit income, and also parking contravention notice issuance if motoring activity reduces.



5. Supply chain

Key threats:

- A. Impact of cost pressures on suppliers or partners
- B. Suppliers trying to make Brent take culpability for their Brexit risks
- C. Delays to delivery of goods
- D. Indexation exchange rate issues

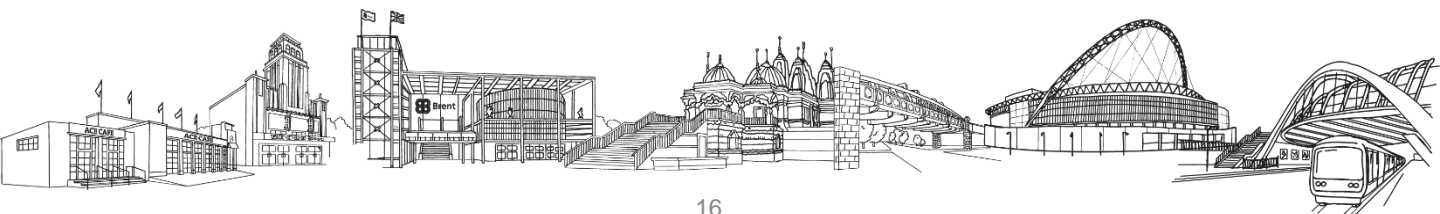


Key opportunities:

1. Identify and use more local suppliers

Actions:

1.	Identify EU suppliers in the supply chain
2.	Raise risks with Central Government
3.	Identify where delays are likely and change projects pace where possible
4.	Identify local and non-EU suppliers
5.	Work with the Commissioning Board to keep abreast of emerging issues and risks



Overview

Brent Council spends around £220m per year on goods and services from around 4,000 suppliers. Whilst it is impossible to understand the impact of a No Deal Brexit across the full extent of the council's supply chain, we are taking steps to assess the preparedness of key suppliers.

The council will continue to liaise with its key suppliers to ensure they are taking a managed approach to business continuity in the event of a No Deal Brexit.

Leaving the EU without a deal is likely to also mean leaving without a customs agreement. The UK will then revert to World Trade Organisation rules. The UK has already agreed trade deals with a number of other countries but not yet with the EU. Goods may still travel to the UK via the EU, and will then have to succumb to their customs checks.

In detail

The Government is proposing a Government Owned or Operated Logistics (GOOL) scheme in which they obtain (either through buying, leasing, or converting military vessels) roll-on roll-off lorry ferries to ensure vital supplies such as food and medicines continue to reach the UK if it leaves the EU with no deal.

Customs checks at ports initially will continue as they are now if the UK leaves the EU without a deal. All businesses which move goods into or out of the UK will need an Economic Operator Registration and Identifier (EORI) number which starts with GB. The businesses team is raising awareness of this through the businesses newsletter, and also by visiting small town centre businesses.

The pest control service provided by Brent Council uses baits and poisons believed to be made in Europe and imported to the UK by the supplier. This is a small part of the service, and any increase could be passed on to the customer without a significant increase. UK supplies might be equally competitive.

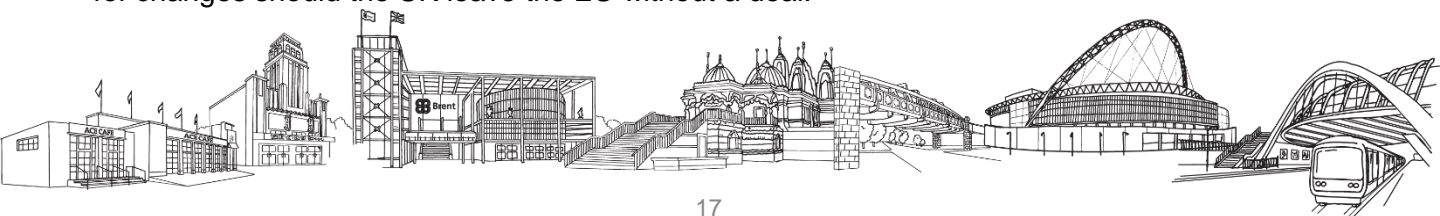
The funeral service leases their vehicles from a national framework. Additional tariffs may affect the price of some commercial vehicles, but UK made vehicles could be used as an alternative. Again the cost could be passed on to the customer, estimated at around 10p per customer.

Changes in law may mean that contractors will not be able to deliver the service within the cost agreed. After the UK leaves the EU, there may be changes in some laws. If this happens, there is a clause in each contract which allows the contract to be discussed and appropriate next steps agreed. Suppliers have stated in their tender documents in September 2019 that subcontractor/suppliers will not guarantee delivery costs beyond Brexit.

Indexation could be an issue. Contracts with suppliers from outside the UK may be affected by the consumer price index or retail price index exchange rate, which could change as a result of Brexit. Within each contracts there will be clauses that will allow adjustments to the contract on an annual basis related to inflation and allow both parties to discuss additional costs.

Imports to the UK may increase lead time for the delivery of equipment being sourced such as laptops for the IT roll-out, and could have an impact on project deliverables.

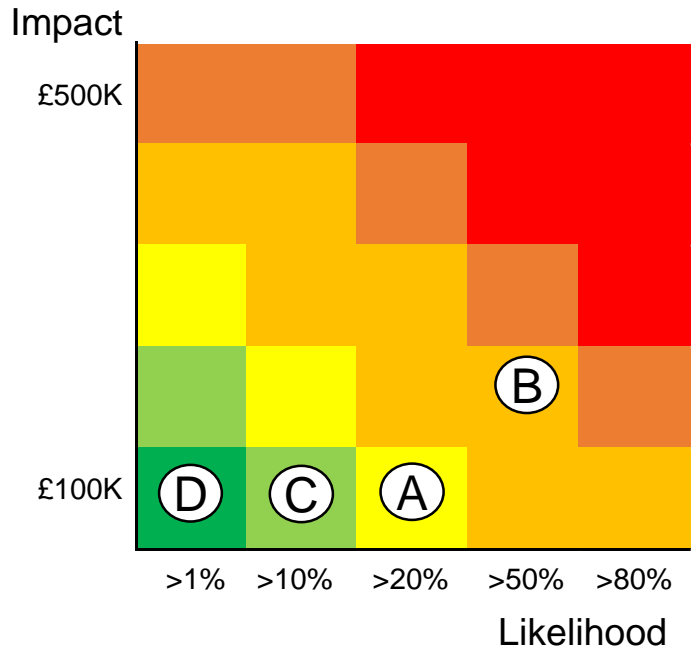
The Government has run a high profile campaign "Get Ready for Brexit" part of which included advertising on motorway billboards highlighting the need for hauliers and businesses to prepare for changes should the UK leave the EU without a deal.



6. Local partnership working

Key threats:

- A. Local business failure
- B. Decline in the voluntary sector
- C. Business rates income falling
- D. EU funding no longer available

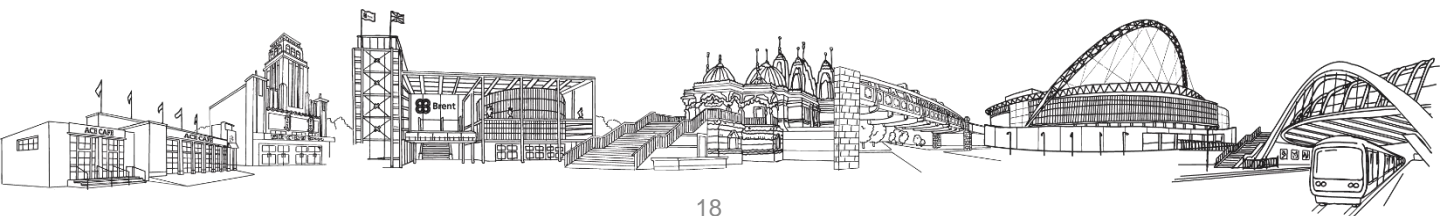


Key opportunities:

1. Exporting if the value of the pound decreases

Actions:

1.	Raise awareness of the EU settlement scheme with local businesses
2.	Identify local business concerns and escalate as appropriate
3.	Promote apprenticeships to local businesses to address skills gaps
4.	Promote workforce training and other courses to local employers
5.	Monitor our secondary high streets, particularly the small businesses on them



Overview

Small and medium sized enterprises (SMEs) form the vast majority of business in Brent. It is not known the extent to which they trade with EU countries or employ EU nationals, both of which are will likely be affected by Brexit. However, any economic downturn would result in reduced business rate revenue for the council, which will be one of its main sources of income by 2020.

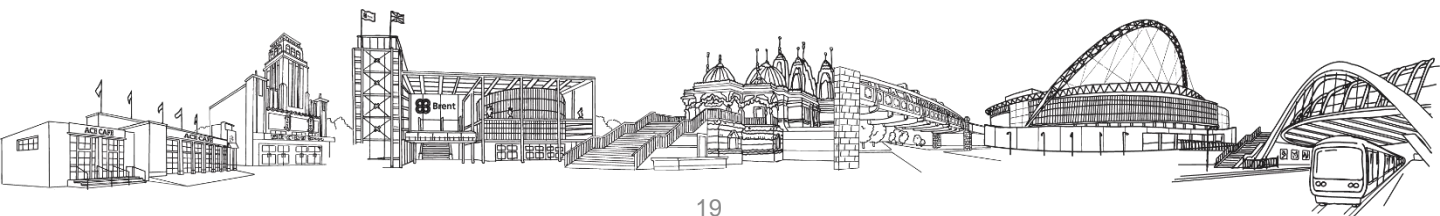
The Federation of Small Businesses found when surveying their members that almost one third of small firms do business with or within the EU. Different industries employ different skill levels, medium skilled level EU workers are the most commonly employed, and are predominant in the construction, and manufacturing sectors. The survey highlighted three key concerns held by SMEs:

- accessing the skills they need
- ability to grow the business
- enforcing new immigration rules

Some experts predict the value of the pound to decrease following Brexit, and other experts expect it to have no affect or maybe even increase. The value of the pound impacts on both the import and the export markets. It is worth noting that when it decreases, and the import market is negatively affected, the exact opposite is true for the export market. Companies within Brent which export to the EU and other countries, are likely to be positively impacted as the value of the pound decreases. Tourism is also likely to be positively affected by a lower value of the pound.

Our high streets, and secondary high streets have a diverse range of shops in them, with specialist food shops, cafes, and takeaways catering specifically to different European communities. In Brent, we employ town centre managers. The town centre managers coordinate activities and lead on plans in nine high streets working closely with residents and businesses.

After the UK leaves the EU all businesses which move goods into or out of the UK will need an Economic Operator Registration and Identifier (EORI) number which begins GB. VAT registered businesses will automatically be registered with an EORI number and non-VAT registered businesses will need to apply for the number. There will be a new online customs system where goods will have to be declared. Export tariffs may increase.



In detail

Recent data collated via London Councils Business 1,000 Survey suggests that Brent is the London borough with the highest proportion of businesses where EU staff make up more than 50% of the workforce. This was a cross-sector survey, indicating that the effects of Brexit may have a serious impact on recruitment and retention across the local business base.

Although we are not formally tracking business confidence, anecdotal evidence from business groups suggests confidence is low and uncertainty remains high.

Brent could consider what it could do to support local small and medium sized enterprises. It should be noted that a 2017 scrutiny task group report about Small and Medium sized Enterprises (SMEs), the recommendation was made to *“develop a skills programme to ensure that SMEs have access to appropriately skilled, locally based staff”*. In response to this recommendation Brent Start developed wider courses aimed at SMEs, for example, digital skills. The Business Board, whose members represent a diverse range of size and sectors including SMEs, act as ambassadors for the Borough’s business community. A follow up report from March 2018, a year after the scrutiny task group, reported that this board *“is in the process of selecting further priorities for action from a range of possible projects, which includes local skills development to meet workforce needs.”* This programme is used to develop local talent ensuring SMEs have access to the skills they require.

Following a Partners for Brent Brexit event, our Employment and Skills department will work with United Colleges and the Department for Work and Pensions (DWP) to look at engaging with businesses whose workforce is being impacted by Brexit and creating pathways for college students into job opportunities as well as exploring the possibility of retraining vulnerable groups from the work and health programme.

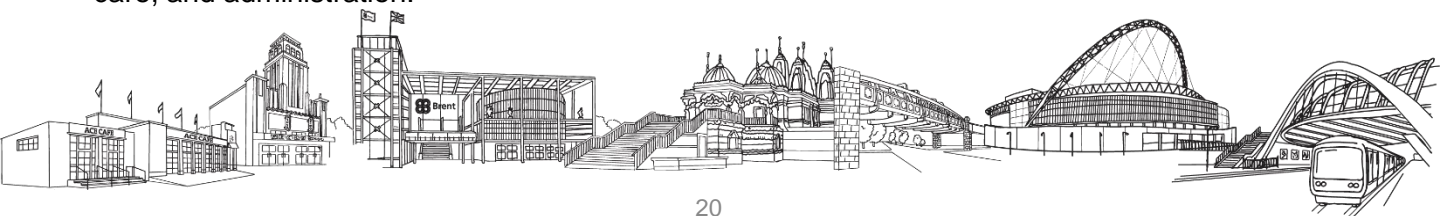
Every year businesses receive a request for business rates. We will send out a newsletter to each business with their business rates request letter with suggestions about how to prepare for Brexit, including information about the EU Settlement Scheme, importing and exporting, and where to find changes to regulations.

Businesses in Brent are supported by our businesses team. The businesses team is ensuring they are kept up to date about issues relating to Brexit and utilising our town centre managers to talk to small businesses on the High Street which may not be in contact with other businesses. They are highlighting changes including getting an EORI number for importing and exporting.

Our regulatory services team has been regularly communicating with the Food Standards Agency (FSA) (<https://www.food.gov.uk/>), [Animal and Plant Health Agency](#) (APHA), and the [Department for Environment, Food & Rural Affairs](#) (DEFRA) regarding the impact of Brexit on food service delivery, particularly export health certificate requirements for exporting products of animal origin to Europe, following a no deal Brexit. They have registered all their Environmental Health Officers with APHA to enable all officers to be able to inspect and sign export health certificates and have set aside reserve money should there be a surge of requests for export health certificates.

We are in regular contact with all our approved food manufacturers and businesses that export food. The FSA as well as Brent have written to all food manufacturers in the Borough alerting them of the requirements on food export to Europe following Brexit.

It is worth noting that in 2020 adult education will devolve to local regions. Brent will have more ability to influence the London spending. This means that Brent will be able to provide training to fill gaps locally, specifically in areas which are particularly at risk including education, health, social care, and administration.



In detail continued

Brent Council provides identity document scanning for those applying for the EU settlement scheme for a charge of £14 per person. Brent Council has offered businesses to deliver this identity document scanning service in their workplace for a minimum of ten registrations.

The Living Room which was previously funded with EU monies, is now funded through other funding streams. The only programme Brent has which is match-funded by the EU and government, is the five year work and health programme. The work and health programme is devolved from central government to London and commissioned under the WLA. This project will be evaluated at the end of its term, and decisions will then be made about its effectiveness. This year's outcome based review (OBR) focuses on mental health and employment. The in-depth work undertaken throughout the OBR will determine the level and breadth of need in Brent, and as well as determining specific local requirements should also identify better ways of working which will then be implemented.

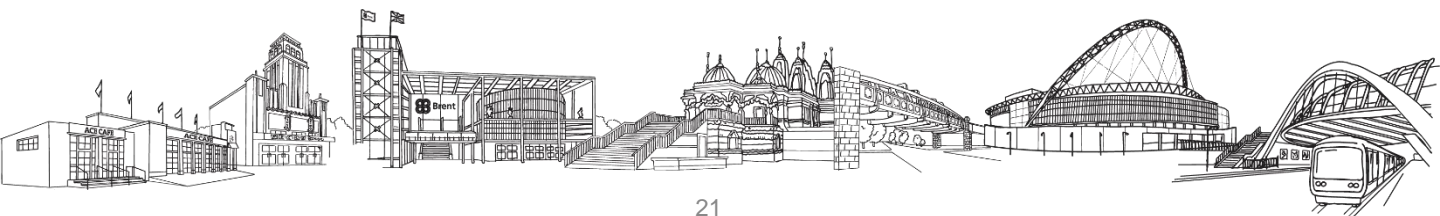
Although we don't receive other funding from the European Social Fund (ESF), there will be projects in Brent and London which do. When this funding finishes, these projects, and the support they provide might also end. The quality of these programmes is unknown.

In Brent ESOL funding is provided by the government, and is not funded by EU money, so will not be affected by the UK leaving the EU.

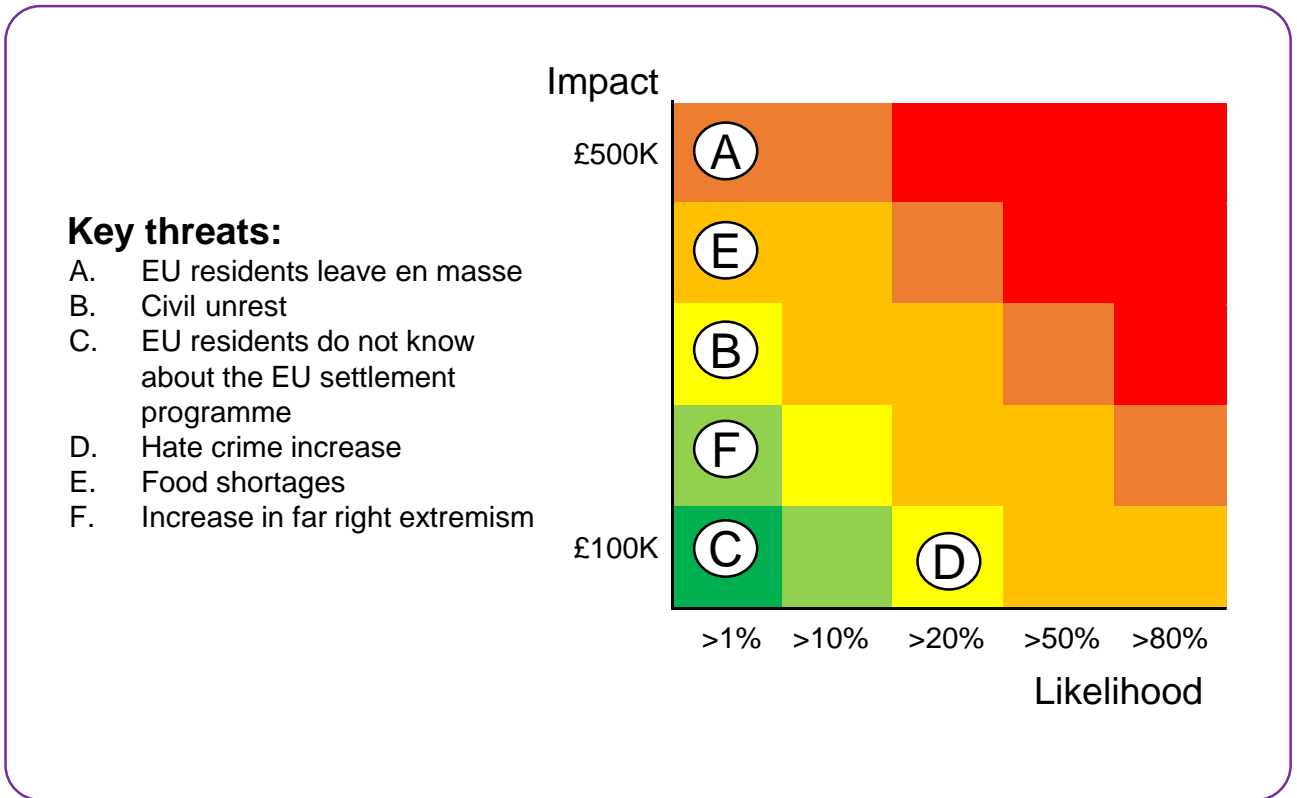
London currently benefits from ESIF funding totalling £581m. We do not know how much of that is for services in Brent, but do know that charities which provide vital services to our residents currently receive EU funding, and may be impacted as a result of Brexit. One of these charities is Crisis who provide support to the homeless.

Although central government have committed to replacing this through a UK Shared Prosperity Fund (UKSPF), there has been no information on the value and eligibility conditions of the replacement funding, leading to much uncertainty on projects that are currently funded until 2020 and any new ones under development.

In September Brent Council will host a Partners for Brent Brexit meeting, bringing together public sector services, voluntary and community sector partners, local business representatives and others across Brent to discuss Brexit and work together to mitigate its impact on Brent and its residents. Neighbouring borough council Brexit leads will also be invited to this event.

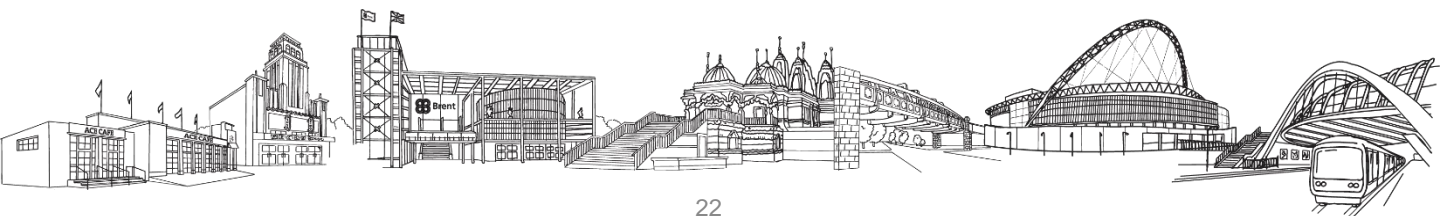


7. Community engagement



Actions:

1.	Raise awareness of the EU settlement scheme targeting EU social media users
2.	Work with specialist charities to raise awareness of the EU settlement scheme for the harder to reach population
3.	Continue to have a zero tolerance approach to hate crime
4.	Continue to monitor police reports and look for signs of increased hate crime
5.	Continue to monitor signs of far-right extremist activity, work with the police and partners, and report to Channel Panel as required
6.	Raise awareness of far-right extremism including signs, codes, and behaviours of individuals involved or on the fringe
7.	Analyse the electoral roll to understand the possible impact of Brits returning from abroad, and alert Adult Social Care and NHS services if necessary



Overview

Brent Council is keen to engage with its community and has different teams which engage with the community in different ways. These include holding Brent Connects forums, and town centre managers working with local businesses.

Our stronger communities strategy has just been refreshed. Hate crime is included within this strategy, and through it, we will manage community concerns, and oppose attempts to divide people in the borough by their background and status.

Last year, hate crime was decided as a priority for the Community MARAC. The Community Protection team work with the local MET Police to monitor and deter hate crime.

Food shortages, and other impacts of leaving the EU which affect the whole country will have strategies led by Central Government. Brent has short term risk management strategies in place as part of its emergency planning to manage risks, and ensure business continuity. It reviews its business continuity plans annually for all services, and the focus of this year's planning is on the supply chain, and supplier continuity. Brent has systems in place to respond to government emergency strategies.

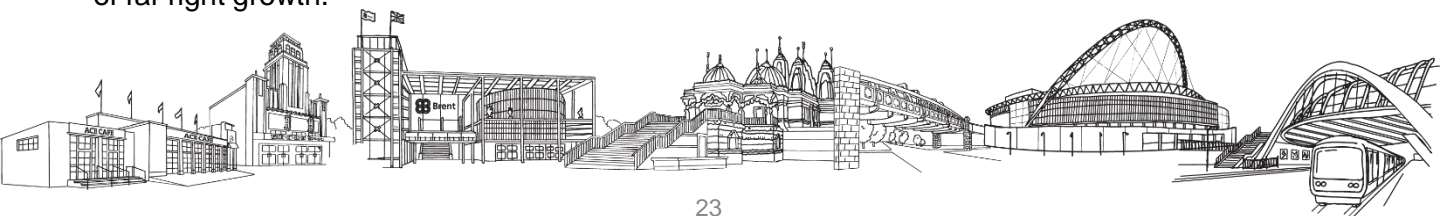
In detail

Brent Council is dedicated to bringing our communities together, and reducing hate and hate crime in the borough. Through the Stronger Communities Strategy, they have implemented a programme of Time to Talk events, to discuss issues that might cause discord and work out how to tackle them, together with the community.

Should the UK leave the EU without a customs deal in place, the price of food imported to the UK may increase. This increase in price is likely to be passed on to the consumer. Brent has the third lowest average wage in London, and one third of its children are estimated to be living in poverty. An increase in food prices will push families further into poverty. An increase in poverty could lead to civil unrest. Foodbanks support our families in the most need. Brexit is not likely to affect volunteering numbers for our Foodbanks, but if food prices rise this will impact on donations, the extent of the impact could be large and given the current need (largely due to Universal Credit) this will could send our foodbanks into crisis.

Food shortages, and other impacts of leaving the EU which affect the whole country will have strategies led by Central Government. Brent has short term risk management strategies in place as part of its emergency planning to manage risks, and ensure business continuity. It reviews its business continuity plans annually for all services, and the focus of this year's planning is on the supply chain, and supplier continuity. Brent has systems in place to respond to government emergency strategies.

Hope not Hate, a leading charity against hate crime, released their report on the State of Hate 2019. The report began by saying *Britain is increasingly divided and that is likely to continue whatever the Brexit outcome* but goes on to say that *whatever happens in 2019 is critical for either deepening or repairing these divisions*. The report states that the *far right is getting more extreme, and younger*. It also states that the far right is *successfully tapping into the political rage and discontent that is prevalent in society*. And *while the numbers arrested for terror-related offences in 2018 was down on the previous year, we are witnessing a growing threat of far right terrorism*. The report expects a continued far right terror threat, and is expecting divisions within Britain to increase. The report also talks about anti-Muslim prejudice replacing immigration as the key driver of far right growth.



In detail continued

In Brent hate crime is regularly monitored and has remained fairly steady, and even shown signs of decline over the last two years. The Community Protection team are proactively monitoring police daily reports for hate crime and any increase in hate crime.

The aim of Prevent is to stop people from becoming terrorists or supporting violent extremism. Their objectives are:

- to respond to the ideological challenge of terrorism;
- to prevent people from being drawn into terrorism; and
- to work with a range of sectors and institutions where there are risks of radicalisation, such as education, faith, health and criminal justice.

In Brent Prevent works to prevent young people from being drawn into all forms of hate and terrorism, including far right extremism.

Brent has put together a plan to engage with and support the harder to reach communities, ensuring that they understand the EU settlement scheme, and are able to register to remain in the UK with their current rights intact should they choose. The plan will include:

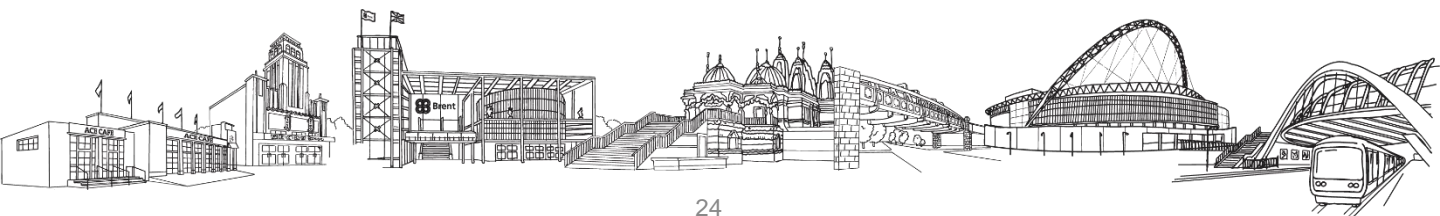
- Work with the Eastern European Network and other local organisations providing services to European residents to provide information and engage with residents
- Work with local and specialised organisations to provide information, support and assistance to European residents
- Work with neighbouring boroughs to best utilise resources and support engagement with hard to reach communities

European Citizens are currently eligible to vote in local elections. To vote, they need to register on the electoral roll. In Brent, there are 42,372 EU citizens registered to vote. The proportion of the electorate that is European varies from 12% in Kenton and Northwick Park, to 25% in Alperton and Wembley Central. If these voters were to leave Brent, it would have a big impact on the electorate.

Currently we are unsure what rights European citizens will be given. Once voting rights have been decided, we will write to all European citizens registered to vote with an explanation of these rights, and include details of how to register on the EU settlement scheme, and explain they may be able to use their letter as proof of residence for the scheme.

There are about 1,000 residents registered to vote who live abroad. Many of these residents will live in the EU. These ex-pats may consider returning to the UK depending on the offer to UK citizens following the UK leaving the EU in the countries they are living in. Although these numbers are small, as the ex-pats are likely to be older this may impact our social care and NHS services. An analysis will be undertaken to understand the possible impact.

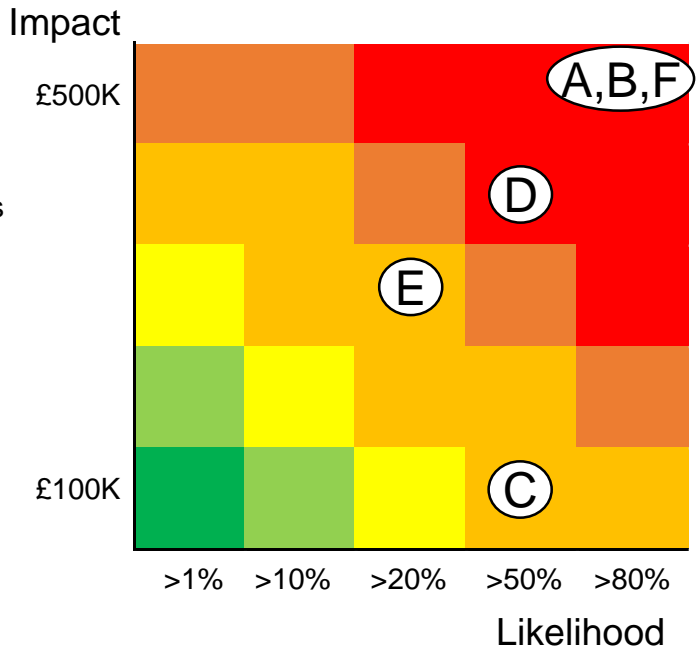
Another possible issue is the repatriation of the deceased. Should there be delays at borders, this will be particularly distressing to families affected, and may affect certain faiths which require a prompt burial. Currently we have between 20 and 30 repatriations each year.



8. Regional and local growth

Key threats:

- A. Housing market stagnates and/or house prices decrease rendering regeneration projects unviable
- B. Private sector stops new schemes leading to reduced affordable housing provision.
- C. Construction supplies increase in price due to being brought in from Europe
- D. Skills shortage
- E. Major employers relocate
- F. Loss of income from downturn in planning and building control applications

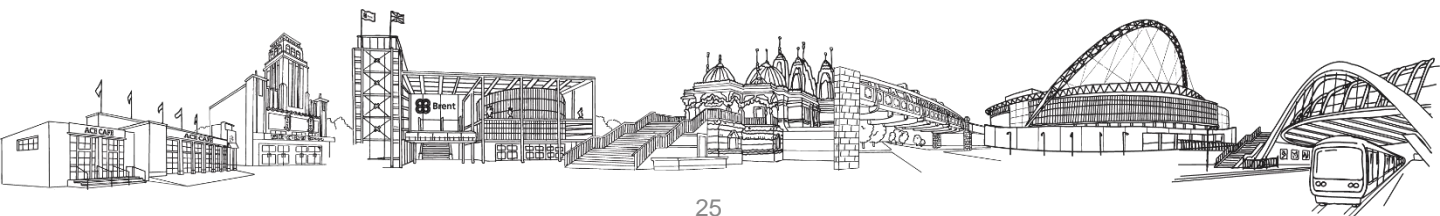


Key opportunities:

1. Increase in social council housing from lower value land, and developers looking to sell dwellings to the Council
2. Provide apprenticeships in the construction sector, creating employment for our youth
3. Identify accessible funding streams for projects

Actions:

1.	Raise awareness of the EU settlement scheme
2.	Monitor development pipeline and identify which projects are under threat due to the housing market
3.	Incorporate longer delivery times into project plans to account for delays in materials coming through the EU.
4.	Identify and raise awareness of available non-EU funding streams
5.	Promote the Mayor of London's message: "London is Open"



Overview

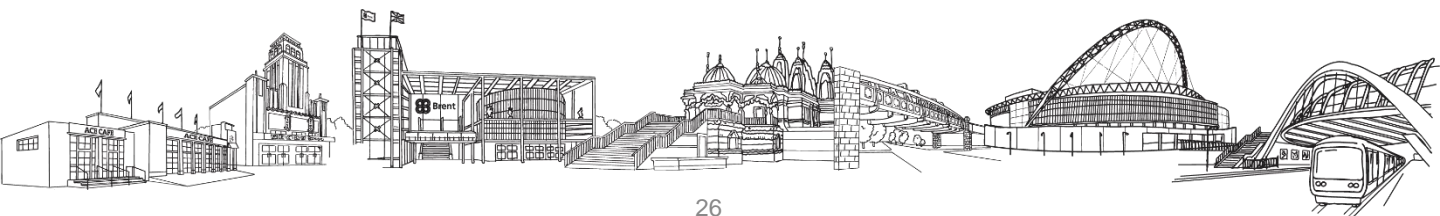
Brent has a number of capital projects whose viability relies on house prices delivering a return which finances the development. Brent is also reliant on the private sector to bring forward schemes which provide private housing for sale, private housing for rent or shared ownership, and affordable housing. Brent has two housing zones and eight growth areas. New development brings in affordable housing, business rates, council tax, new homes bonus and community infrastructure levy contributions for local and strategic infrastructure, which could all be reduced if development reduces.

The Council has a number of strategies to support investors in the Borough to demonstrate that 'Brent is Open for Business' and investment in growth should continue. This reflects the Mayor of London's approach as well. The Council is producing a new Local Plan to give clarity and certainty to developers about development in the Borough, has made some new site allocations and designated two new growth areas, and is doing some masterplanning work, all to identify development opportunities. The Inclusive Growth Strategy is to be launched at November Full Council. The Council is also supporting the proposed West London Orbital which will open up areas for development as well as access to jobs in west London and beyond.

The Council is also exploring opportunities to buy housing developments from private landowners to help meet the housing need, and embarking on a programme of self build for around 1,000 new homes for those on the Council waiting list. These opportunities may be enhanced if land values drop and private owners are looking to off load sites.

The anticipated decrease in EU employees is being mitigated by the Employment and Skills programmes focussed on increasing education and skill levels and employment opportunities, including apprenticeships, for residents of the Borough.

Supplies of construction materials, many of which are sourced from the EU, could also be made more expensive and/or less accessible. The extent of this impact will depend on any deal, or no deal with the EU.



In detail

Some evidence based work has been as part of the research for the Inclusive Growth Strategy, analysing key areas and how Brexit will affect them. There are two sectors in Brent on which Brexit will have the biggest impact: the construction, and food and drink industries both of which are significant employers in the Borough.

27% of London's construction workforce comes from the EU. A no deal Brexit which restricts free movement of labour could result in a skills shortage in the construction industry as well as pressure on wages, causing construction firms to face higher project costs and reduce current turnovers.

The final deal or no deal scenario will also affect sourcing of construction materials from the EU, which may incur a tariff and take longer to process, delaying the construction process. A report by KPMG predicts that between 10% and 15% of Gross Value Added (GVA) will be affected. Another report, by Cambridge Econometrics on the effect of soft and hard exit on London by 2030, predicts that London employment in the construction sector equates to around 6% decrease in employment in Brent, which is about 10,000 employees.

There are anticipated increases in export and import prices for food and drink manufacturing as the EU is the main commercial partner for the sector. Food and drink manufacturing employs a large share of EU workers, making it exposed to supply-side constraints and employment shortages. Park Royal has a high concentration of food and drink industries.

House prices in London have decreased over the past year, and the market is fairly stagnant with a drop off in transactions. The underlying uncertainty around Brexit is thought to have contributed to this fall. The viability of private schemes and Council led regeneration and capital projects are influenced by house prices. Large decreases in house prices will negatively affect the many regeneration projects currently running and planned in Brent. House transaction stagnation will also make it harder to achieve sales and therefore loss of income.

Planning policy requires private residential developments of over ten units to provide affordable housing, in partnership with a Registered Provider. If house-builders decide to mothball sites or stop buying new ones to develop because of stagnation or uncertainty in the housing market, there will be less affordable housing provided reducing the Council's ability to provide permanent housing for those in housing need.

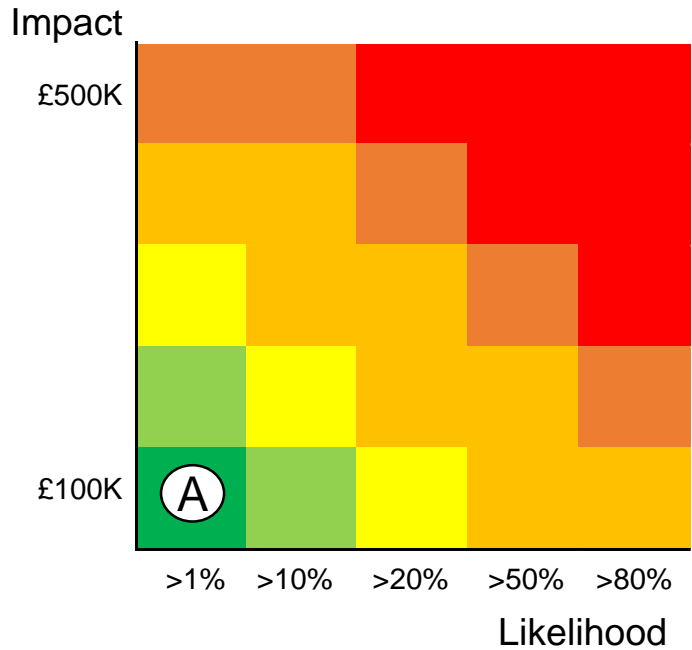
Large companies may relocate, taking their jobs with them. Some employees may move with them. Others may get new jobs or be unemployed. Depending on the impact on the economy other businesses may fold. If the economic base of the Borough contracts there would be a loss of business rate income to the Council, and an increase in unemployment and call on council services. Although there aren't many large companies in the Borough, there may be impacts on the supply chain to these companies.

There may be new opportunities for the Council to purchase more homes at lower prices to provide Council housing, and become 'Borough Builders' again, although the Council as developer would be hit by any shortages of construction skills and materials like other developers.

9. Data and information handling

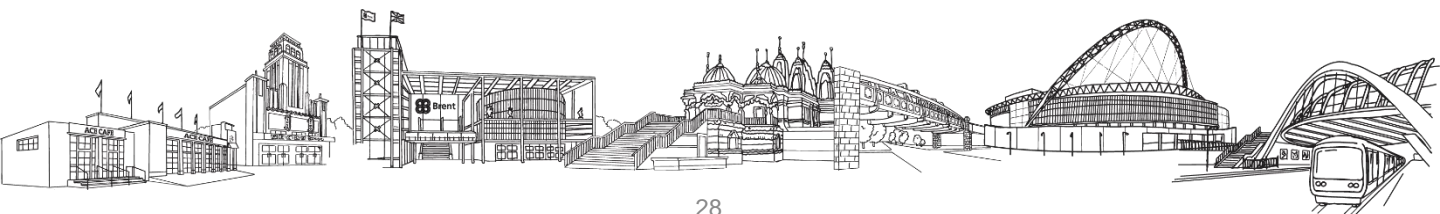
Key threats:

- A. Access to data stored or processed in the EU restricted



Actions:

1.	Identify if any personal data are stored or processed in the EU either directly by us, or through third party suppliers
2.	Work with companies based in the EU to establish a legal basis for sharing the information
3.	Continue to follow guidance from the ICO
4.	Monitor the European Commission and their decision regarding adequacy of data protection in the UK.



Overview

If the UK leaves the EU in 2020 with no agreement in place regarding future arrangements for data protection, there would be no immediate change in the UK's own data protection standards. This is because the Data Protection Act 2018 would remain in place and the EU Withdrawal Act would incorporate the GDPR into UK law to sit alongside it.

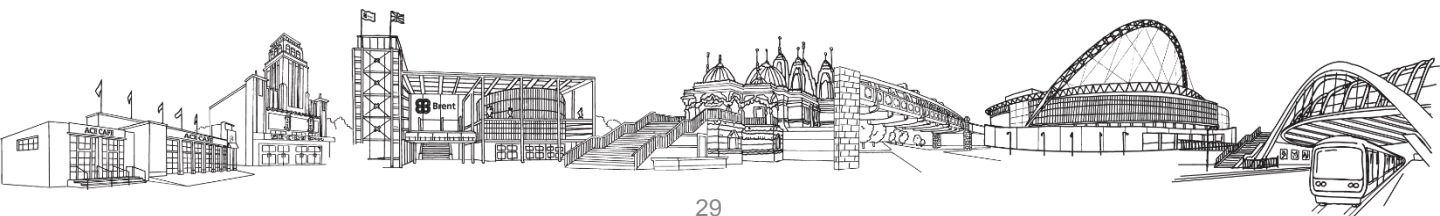
However, the legal framework governing transfers of personal data from organisations (or subsidiaries) established in the EU to organisations established in the UK would change on exit.

At the point of exit, the UK would continue to allow the free flow of personal data from the UK to the EU. This is in recognition of the alignment between the UK and EU's data protection regimes. The UK would keep this under review.

In detail

The European Commission will not make an adequacy decision regarding the UK at the point of exit. It has stated that the UK needs to become a "third" country before any adequacy decisions can be made. If we have personal data either processed by, or stored with organisations established in the EU (including data centres) then Brent will assist its EU partners in identifying a legal basis for those transfers.

Brent's Information Governance team is currently identifying, through its network of information champions, if there are any personal data processed or stored in the EU including through third party suppliers. It will then take the necessary steps to ensure continuity of business either through identifying a legal basis for transfer or by changing suppliers.



10. EU settlement Scheme

There is a large number of EU Londoners living and working in Brent. For a number of risks in this document, the mitigating action is raising awareness of the EU settlement scheme.

Background

The government has put together a settlement scheme for EU nationals. This scheme allows EU nationals to continue to live and work in the UK. It is free to register, and residents who are accepted will get settled or pre-settled status allowing them to continue to live and work in the UK as before. The details of this scheme differ depending on how the UK leaves the EU. If the UK leaves without a deal, only EU citizens who are currently living in the UK will be eligible to apply to the scheme.

In detail

We are raising awareness of this scheme across Brent with a number of media campaigns, aimed at European nationals. These campaigns include articles in our magazines and on our website, posters and flyers in locations known to have high footfall of European nationals, and a targeted social media campaign.

We have held three free public events for residents to find out more and ask questions about the EU settlement scheme. We have a dedicated webpage <https://www.brent.gov.uk/your-community/stronger-communities/brexit/> and email address: eusettlement@brent.gov.uk for concerned residents to ask questions about the settlement scheme. Our webpage also has links to the translated materials, including leaflets and videos, on the Greater London Authority website as well as the translated pages on the government website.

Our registration service provides a chip and check service for Europeans who wish to register on the scheme but do not have access to an android smart device. Employees can take advantage of this verification service.

We provide information sessions for staff, for in frontline service team meetings, and for all staff in lunch and learn sessions. At these tailored information sessions, staff find out about the EU settlement scheme and how it relates to their service area.

Information sessions have also been offered to businesses, schools and charities. Some schools and charities have taken advantage of this offer, including the Royal Association for Deaf People (RAD). This has resulted in RAD applying for and receiving funding to produce a video in British Sign Language, the primary language used by deaf people in the UK, about the EU settlement scheme.

We partnered with City Hall so the Mayor of London's Brexit bus came to Willesden Green on Monday 01 April, providing free advice and guidance to our EU Londoners.

On Monday 07 October we partnered with the Home Office and ran a pop-up in Harlesden hub providing information about the scheme and support applying to it.

We ran an event in early September for the voluntary sector, particularly those who work with EU residents to find out more about the EU settlement scheme, Brexit and to look at how we can work together to ensure residents know about the scheme. The three main themes which came out of this were: lack of information; lack of trust; and those under the radar. As a result, we are working more with third sector agencies to get the message out, and also we are looking into how we can support our homeless citizens to apply.

We are also developing a community champions scheme. Once these community champions are recruited, one of their initial training sessions and remit will be about the EU settlement scheme and spreading the word to their communities.

