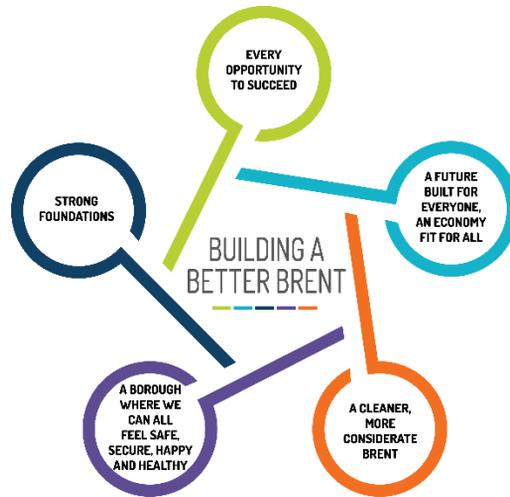
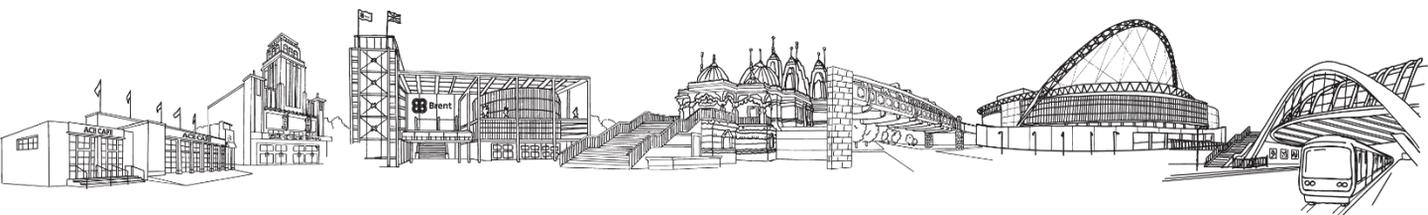


# Brent Council Brexit risk assessment



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: 10-Dec-2020

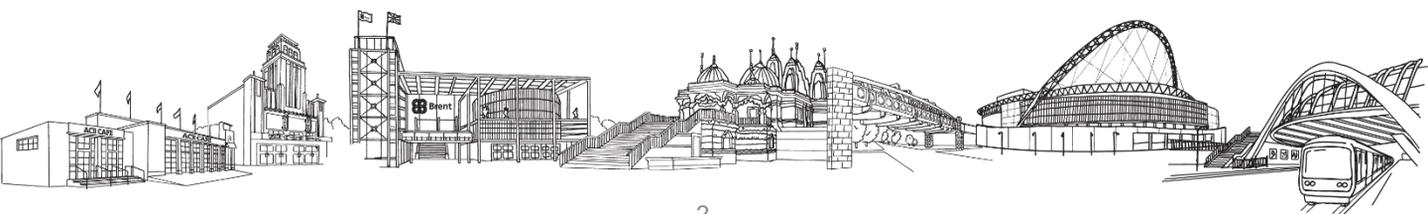


# Contents

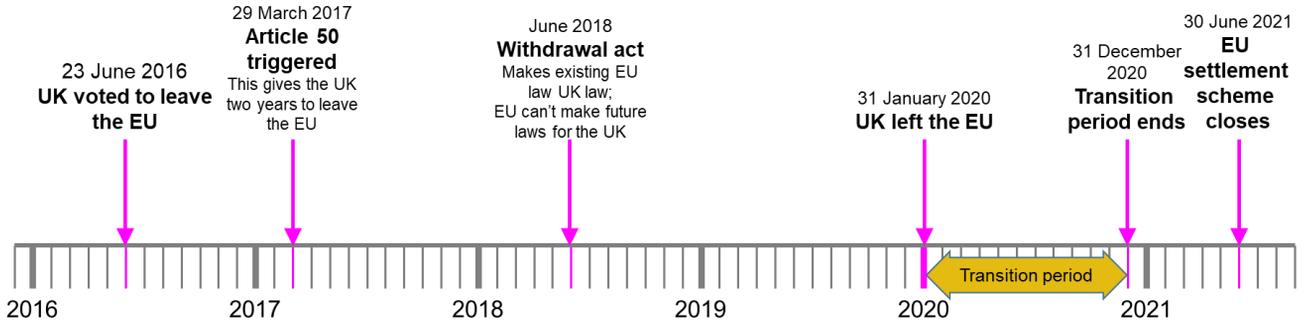
## Background

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## 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 agreed withdrawal terms with the EU. On 31 January 2020, the UK left the EU. We are now in a transition period. During this time the UK will operate as it did as a member of the EU whilst putting in place changes in law. Unless the UK requests an extension, the transition period will end on 31 December 2020.

The withdrawal agreement determined the terms the UK would leave the EU on. Now in the transition period, the UK and the EU are working together to determine their future relationship. There is still a possibility that no trade deal will be made between the two bodies.

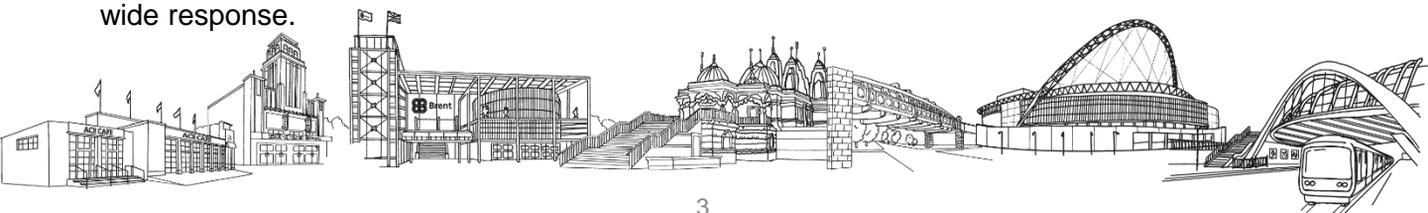
The ONS estimates that Brent has the largest EU population in London, with 66,000 EU nationals living here. Our EU residents contribute to our society in many different ways, working for the council, our health services, and in other industries such as construction, and hospitality.

Covid has already changed our landscape considerably, and we are still living through the situation and its effects. The transition period coming to an end will also have a big impact on us, on our businesses, and on our communities, and there are many different 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 spent some of our allocation on staff and set aside the rest to mitigate as leaving the EU impacts on our population. The Brexit Co-ordination group will 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 provided £20 million more funding for councils to prepare for Brexit.

Brent, London, the UK, and the rest of the world, have been hit by the Coronavirus pandemic. The impacts of this pandemic are long and far-reaching. London Councils has decided that Brexit cannot be treated in isolation and planning for the future will be absorbed into a system-wide response.



## Covid

The UK, along with the rest of the world, has been affected by the Covid pandemic. This pandemic saw us go into lockdown in March 23 2020, with measures gradually easing from 04 July before ending on 31 August. Since then, cases have again risen and the whole country returned to lockdown in November.

During the first lockdown many businesses had to close. Production stopped in many cases and supply chains dried up. Other businesses, like wholesale food suppliers, had a surplus of stock as restaurants and food manufacturers stopped ordering from them.

The government put a furlough scheme in place to keep the economy moving, and to stop people falling into poverty. Government also introduced social isolating support for the clinically vulnerable, asking them not to go out during the lockdown period. Brent supported other people who were vulnerable providing food parcels and food shopping support for those who needed it.

Covid has affected businesses across the country. Some industries have been affected more than others, but many are now worse off. Brexit is likely to affect many of the industries already shaken by Covid, and also other industries who have been less affected by the pandemic. For many of the businesses coping with surviving the Covid pandemic, preparations for Brexit are likely to have become less of a priority.

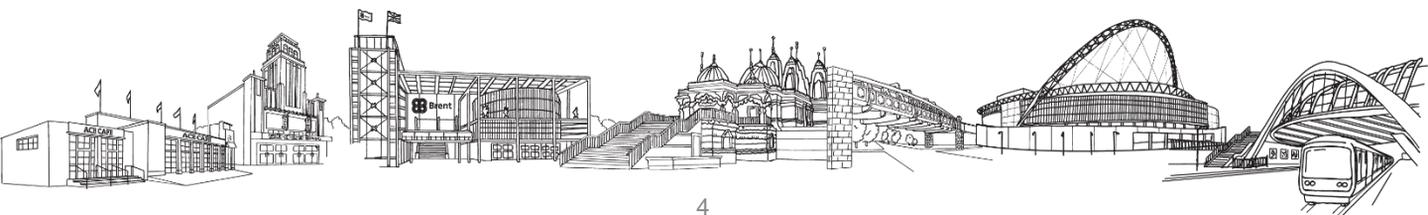
Brent Council has also prioritised ensuring our communities get through the Covid pandemic. The emphasis across all departments has been on supporting our residents and our local businesses. Although other work is now continuing, some projects were understandably put on hold to focus on the pandemic.

The pandemic is worldwide and all the countries in the EU have been affected. The EU has also been responding to the crisis and the future relationship with the UK has not been given the attention it would have received under normal circumstances.

Central Government has also been focused on the Covid pandemic. Little guidance has been issued and although trade talks are now underway we are fast approaching the end of the transition period. The Government decided not to request an extension to the transition period and is now working to catch up and make arrangements with the EU about our future relationship.

Many people have lost their jobs as a result of Covid. We do not know to what extent our residents have been affected in this way. Our European residents who have lost their jobs may well choose to return to their home countries.

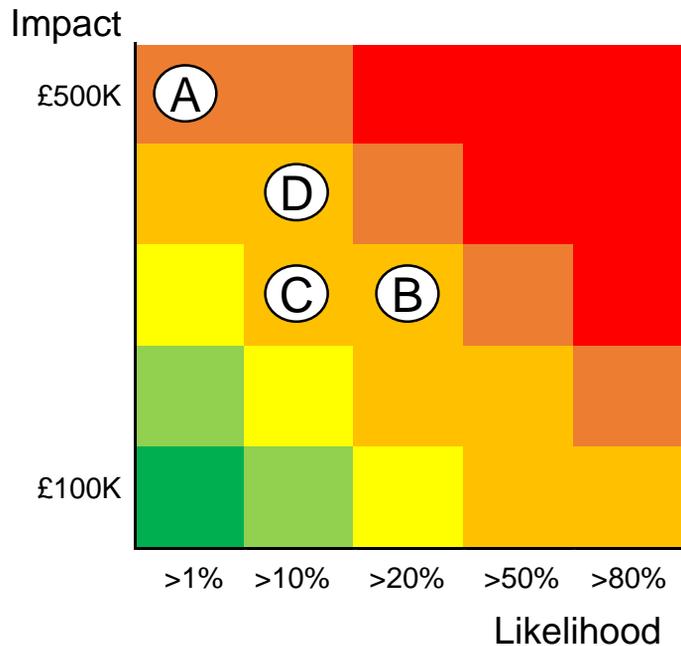
In Brent, because of all the work and preparations done beforehand, there are many areas where we are on track. Due to lack of guidance and clarity from central government, we are not able to prepare in all areas. Other areas have been impacted as attention has been diverted to the Covid response



## 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

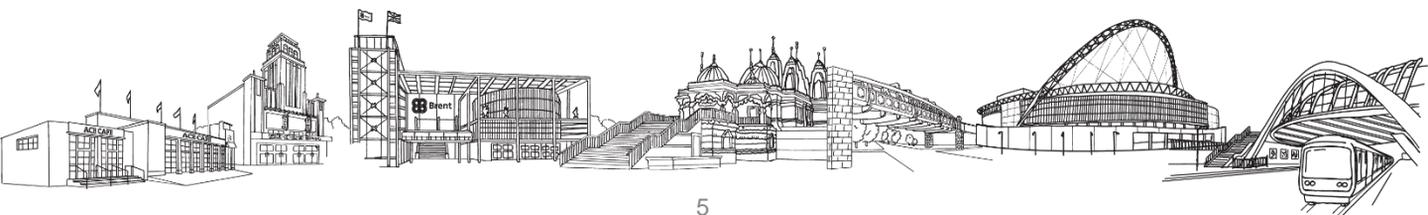


### Key opportunities:

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, at least 84,800 residents have applied to the EU Settlement Scheme. We do not know how many more EU nationals live in Brent, but we do know that 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. 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 in 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.

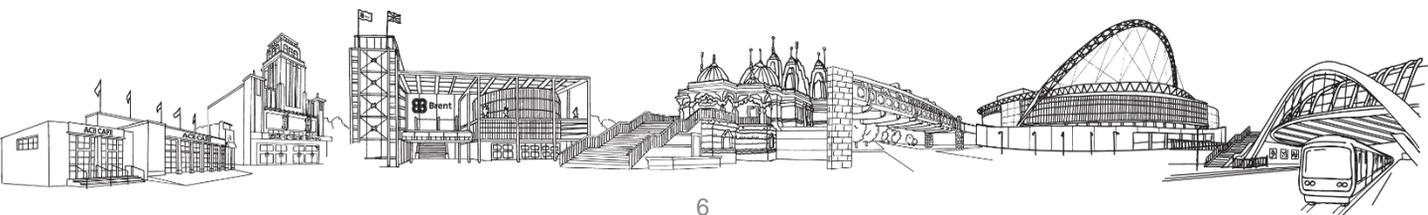
## In detail

### 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 in 2018/19, 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. The EAL numbers have continued to fall, but not to the same extent.

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 have met with our suppliers who employ large workforces to ensure continued joint working and continuity measures. We have shared and will continue to 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. A new field was added to the Oracle HR system to enable employees to enter and update their nationality. Awareness was raised across the council of this new field along with guidance for employees on how to update the field. A Frequently Asked Questions guide about disclosing data was also circulated.

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. Many large companies run their own support programmes, for example, Veolia have their own Settled Status engagement programme for their EU employees, providing advice and support as required.

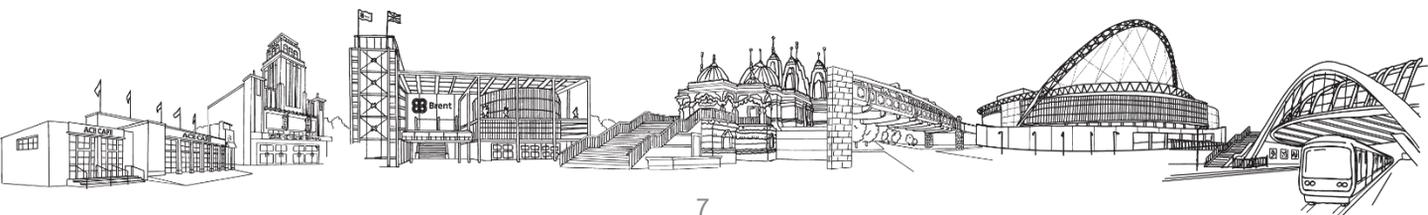
## **Recruitment and retention**

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. The new immigration act is a points based system and includes a minimum annual salary for workers set at £25,600 (although this will be less for some key roles) but there will be no cap on the number of people who can come into the country with this minimum salary. Under this act, employers requires a sponsors' licence. Brent is currently renewing their licence, and has plans in place to identify which positions may need to be sponsored. As the process becomes more difficult 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 implemented for learning and development activity for the Strategic Priority category. This includes 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, which comes into force from 01 January 2021, is a points based system for all workers regardless of where they come from; EU workers will not get preferential treatment. 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 are working 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. Current areas of need identified are construction and hospitality.



## 2. Statutory services: Social Care

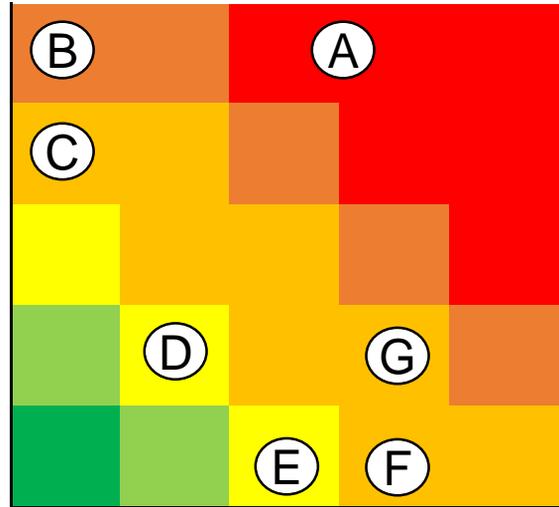
### Key threats:

- 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

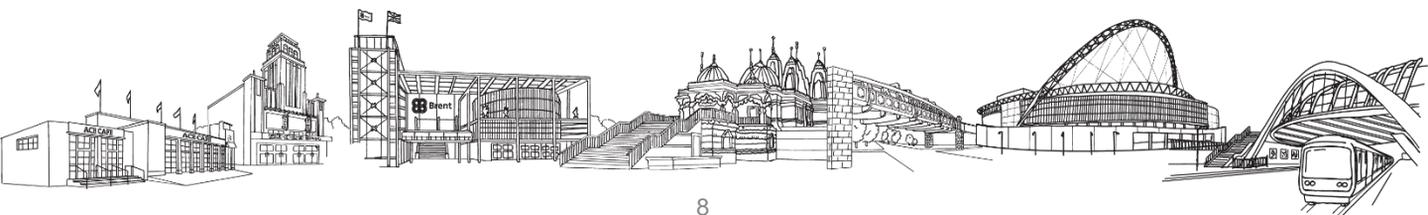


>1% >10% >20% >50% >80%

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

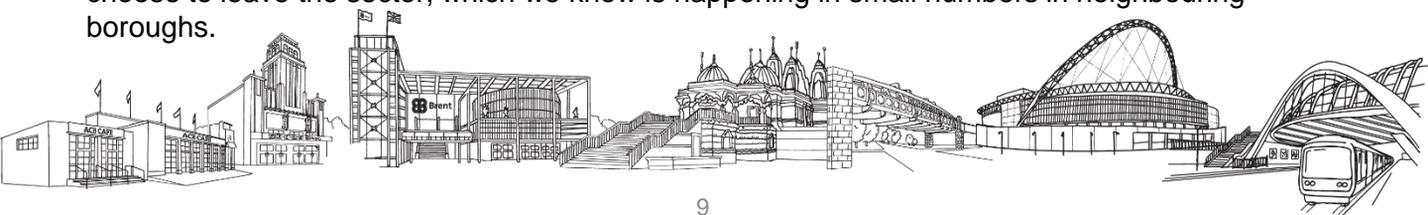
There are a number of different organisations providing different levels of care and support to children and adults. These providers range from large organisations, providing care in many different boroughs, to very small organisations providing specific local care. With this large number of care providers 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 our care providers twice raising awareness of issues related to Brexit, and 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.

We do not fully know, and may not for some time, what the long term effects of Covid 19 will be on our care services. There are fewer people in our care homes now than this time last year, due to the number of deaths, coupled with less demand for care home placements. Work is being done with the London School of Economics to understand the financial viability of the care home sector due to Covid so that councils can prepare for the likely impact. It is possible that some care home owners choose to leave the sector, which we know is happening in small numbers in neighbouring boroughs.



## In detail continued

### **Medicines and Vaccines**

One whole section of the guidance issued by the Department for Health and Social Care for leaving the EU without a deal 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. 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. Now that we have left the EU with a deal, these procedures are no longer in place. If the UK cannot come to an agreement with the EU about their relationship after the transition period ends, it is likely that these plans will be revived.

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.

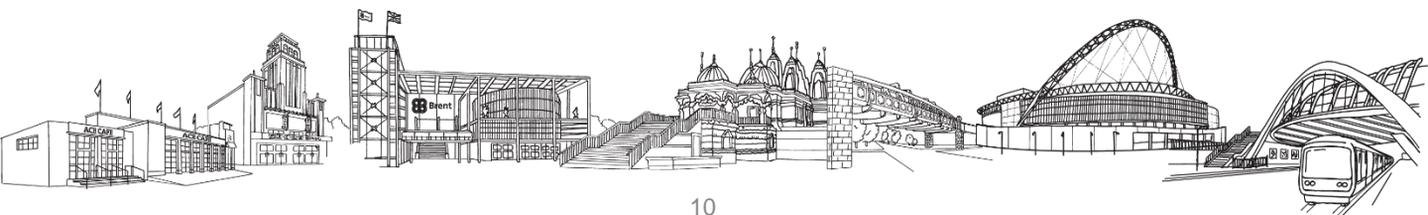
Children and Young People are contacting all providers of care at home services and relevant residential settings to remind them that they need to follow national guidance and not stockpile medication.

### **Professional regulation**

Anyone whose qualification has been recognised and who was registered in the UK before 11pm on 31 January 2020, will continue to be registered after this point. Anyone who has applied by this time will have their application concluded under current arrangements. This will affect nurses and doctors; there are some nurses employed in nursing homes. Following this date, the arrangements are currently undecided. The government has not provided anymore information about this.

### **Longer term**

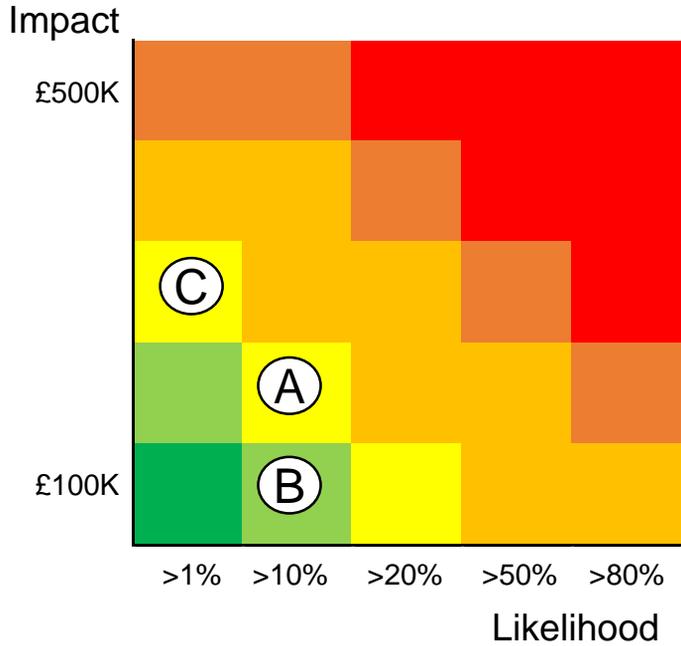
Now the UK has left the EU, the effects may be felt in the longer term with the numbers of EU Nationals (and other foreign nationals) working in social care potentially declining and providers finding it harder to recruit to vacant posts. Already social care has recruitment issues and Brexit could exacerbate 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

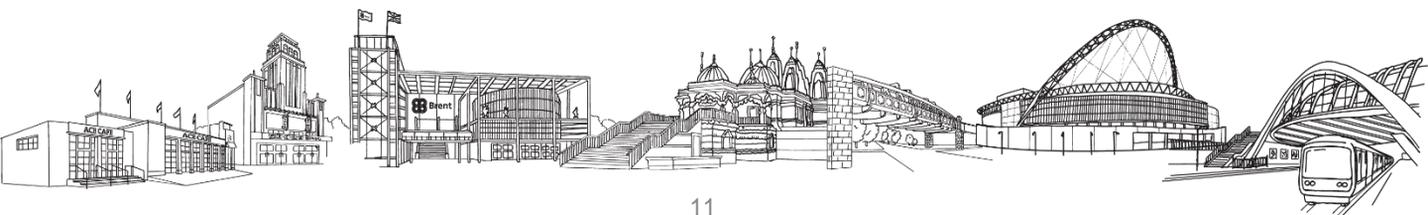


**Key opportunities:**

- 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

State funded schools are self – governing. As such the council monitors and supports state funded schools, but does not run or manage them.

In Brent there are 87 schools: [2 All-through, 4 nurseries, 60 primaries, 2 PRUs, 14 secondaries, and 5 special schools ], with 48,512 pupils on the roll.

Pupils come from all different backgrounds. There are 6,790 pupils (14%) 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%.

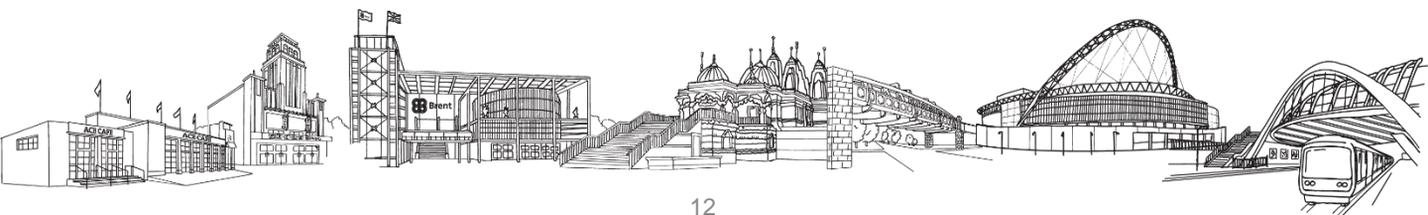
Although schools are responsible for their own budgets, and managing their staff, the council is working with schools adversely affected by the drop in pupil numbers, putting plans in place to mitigate the financial risks associated with changing pupil numbers for example agreeing short-term caps on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

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.

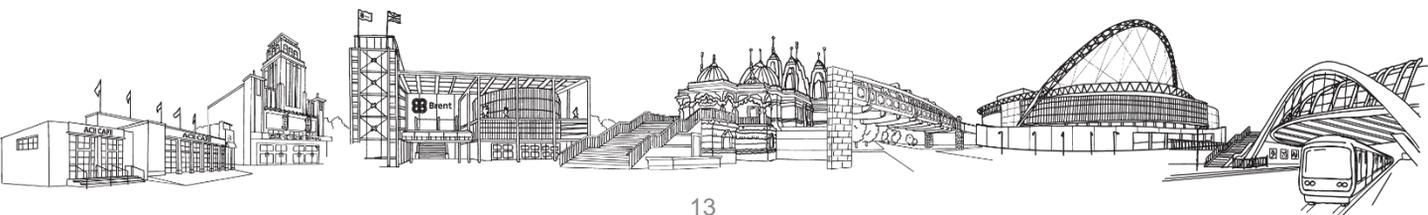


## In detail continued

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.

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. Most of our Looked After Children and Care Leavers who need to have applied to the scheme and some have been granted pre-settled status and some settled status. The cohort is changing daily with the addition of the newly accommodated children, but we have a system in place to identify EU nationals and support them with their applications.

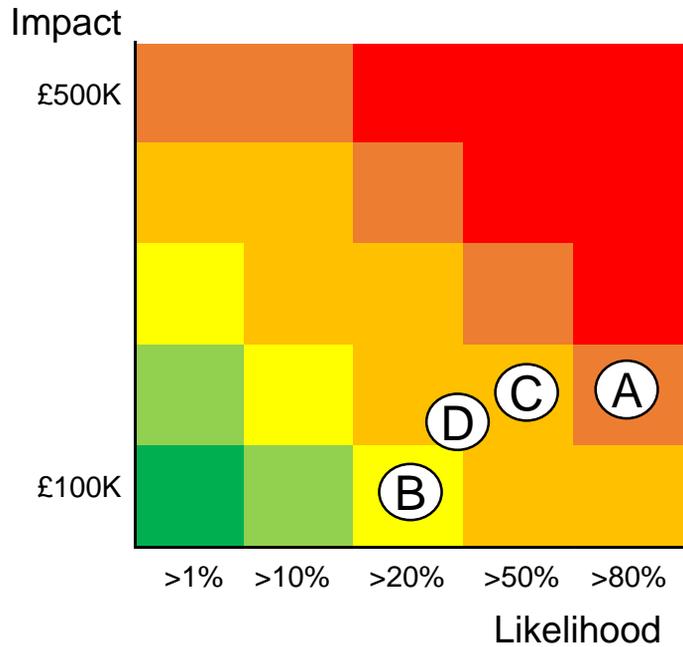
Brent children and young people participated in the University of Liverpool Home office funded project: "Creating Child Friendly Information about the EU Settlement Scheme" which created information materials that can be used by children, their parents, and other adults to help children understand and 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

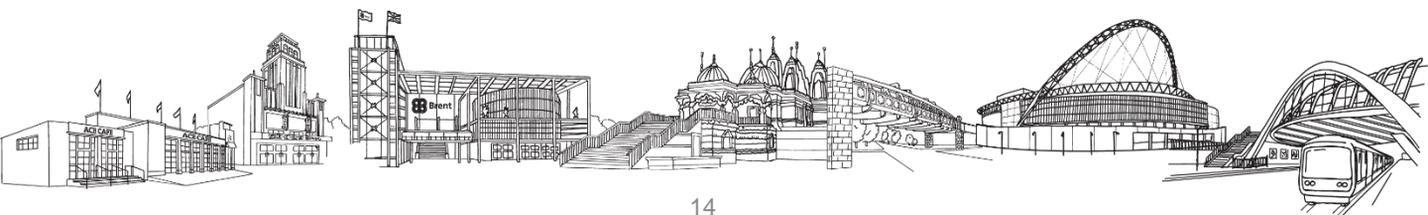


### Key opportunities:

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 enshrines 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 Withdrawal Agreement, the UK continues 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.

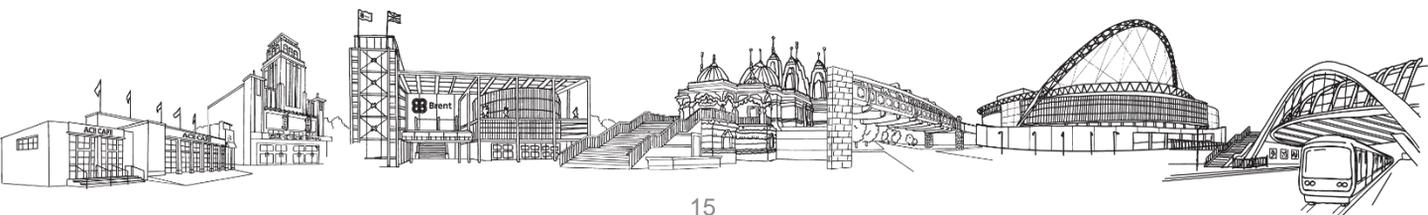
## In detail

Government are implementing 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 to understand, interpret and apply any changes to the law and we will need to increase inspections etc. to ensure awareness and compliance, all of which will increase demand for our Regulatory Services team.

The Regulatory Services team have been working at their maximum capacity on the Covid response over the last nine months, overseeing the lockdown and reopening of our high streets, enforcing the wide ranging new Covid laws and exercising powers, where necessary to support businesses to achieve compliance and to reiterate Covid secure advice to the public. As a result of this focused work, preparations for Brexit are not as advanced as they would have been under normal circumstances. The team has just recruited ten new Covid response staff which will reduce some of the current demands, but this still leaves the Regulatory team stretched as officers will have to continue some of the Covid duties and catch up with other backlogs.

New Brexit regulations are much wider and more complex than Covid ones, so although the team adapted to the pandemic quickly, it will be more complicated to respond to the Brexit changes. 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.

The government is currently discussing a trade agreement with the EU. Until this is agreed, there is a possibility that on 01 January 2021 trade with the EU will return to World Trade Organisation rules. The EU has trade agreements with around 40 other countries; the UK needs to agree trading terms as an independent country with these 40 countries. Currently just over half of these countries have agreed to continue trading with the UK on the same terms.



## In detail continued.

New controls will be implemented on controlling imports and exports. There is a staggered implementation of the new controls. The table below shows the timetable.

01 Jan 2021	Exports of animal products to the EU, including fish, will require an Export Health Certificate (EHC) which can be signed by local authority certifying officers. (LAs do not have a statutory duty to conduct these checks)
01 Apr 2021	Port Health Authorities will be required to carry out new sanitary and phytosanitary (SPS) checks on EU goods
01 Jul 2021	Port Health Authorities will be required to carry out documentary, identity and physical checks on animal products (including POAO and animal by-products).

There is the possibility that our colleagues in port authorities will not be able to cope with the checks and controls that will be placed on them. 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; Local Authorities will be notified of their 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 made more difficult as goods enter the supply chain and are broken down into smaller consignments for onward distribution. This will be of particular note to the high number of Brent's import businesses.

Importers, wholesalers and other distributors may be affected by changes in the law, and as a result may have to undertake greater controls and checks to their products and not be able to deliver their contract within the currently agreed price or timescale. 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.

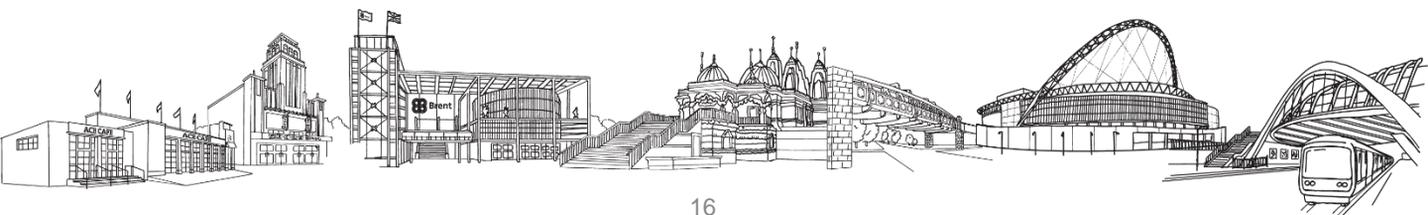
From a waste perspective, advice from DEFRA suggests that 98% of waste exports are expected to be largely be unaffected. Veolia have stockpiled critical supplies for the small proportion of imported goods they need to operate, and are putting in place contingency arrangements. They have also put in place freight forwarding arrangements for exporting recyclates which meet the new EU customs requirements.

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.





## Overview

Brent Council spends around £220m per year on goods and services from around 4,000 suppliers.

Currently the UK is negotiating a trade agreement with the EU. It is likely that if an agreement or no agreement is reached from 01 January 2021, trade with the EU will revert to World Trade Organisation rules. The UK has already agreed trade deals with 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

Customs checks on imports at ports initially will continue as they are now if the UK doesn't agree a trade agreement with the EU before the transition period ends. Changes will be enforced on exports and import changes will be introduced over six months.

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 has been raising, and continues to raise awareness of this through the businesses newsletter, and also by visiting small town centre businesses. We also held (before Covid) two Building Resilience to Brexit workshops (commissioned by the GLA) for local SMEs.

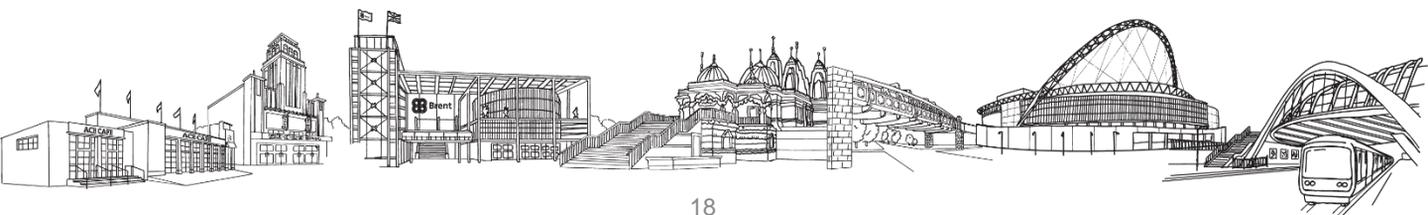
The pest control service provided by Brent Council uses baits and poisons believed to be made in Europe and imported to the UK by the supplier. This is a small part of the service, and any increase could be passed on to the customer without a significant increase. UK supplies might be equally competitive.

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. Once new laws are agreed, there may be changes. 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 contract 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.

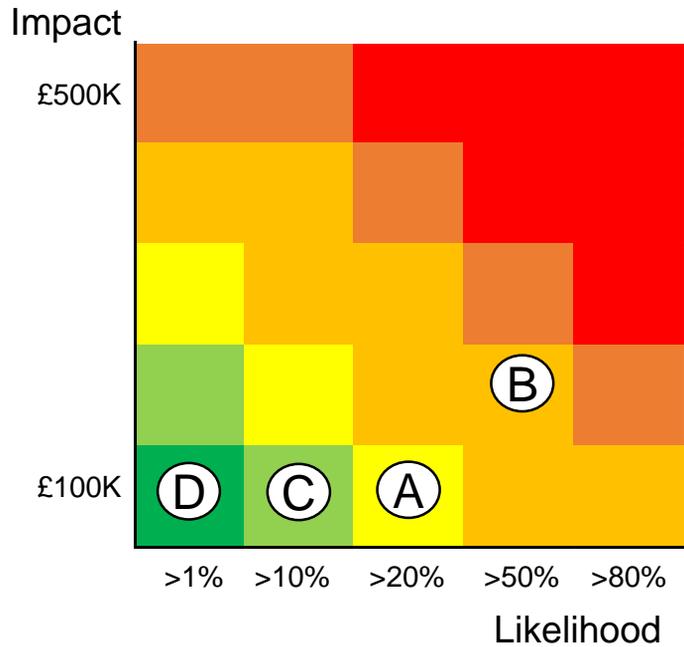
Imports to the UK may increase lead time for the delivery of equipment being sourced such as laptops for the IT roll-out, and could have an impact on project deliverables.



## 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

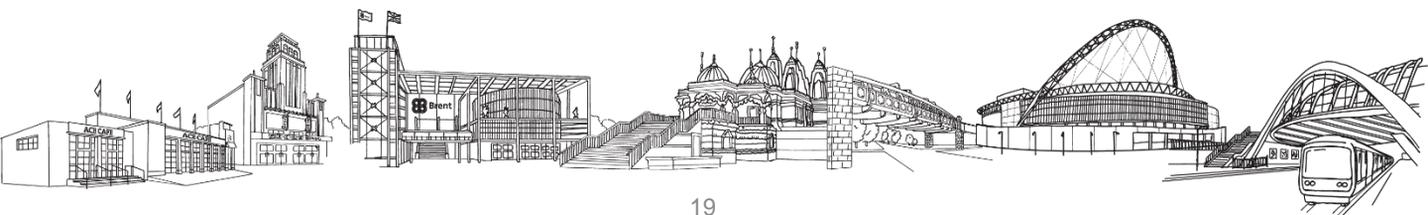


### Key opportunities:

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 is one of its main sources of income.

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

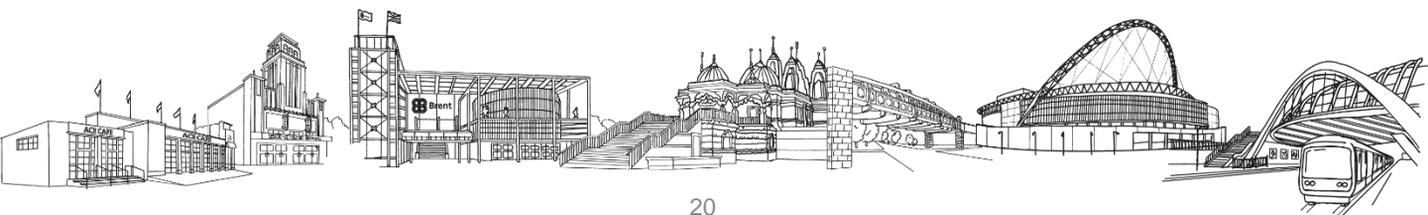
Some experts predict the value of the pound to decrease following Brexit, and other experts expect it to have no affect or maybe even increase. The value of the pound impacts on both the import and the export markets. It is worth noting that when it decreases, and the import market is negatively affected, 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.

Brent's employment and skills team has facilitated two successful building resilience to Brexit workshops for local SMEs, commissioned by the GLA.

The team continues to communicate all changes which may affect local businesses through a newsletter for local businesses. This includes changes as a result of Brexit and the end of the transition period.



## 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.

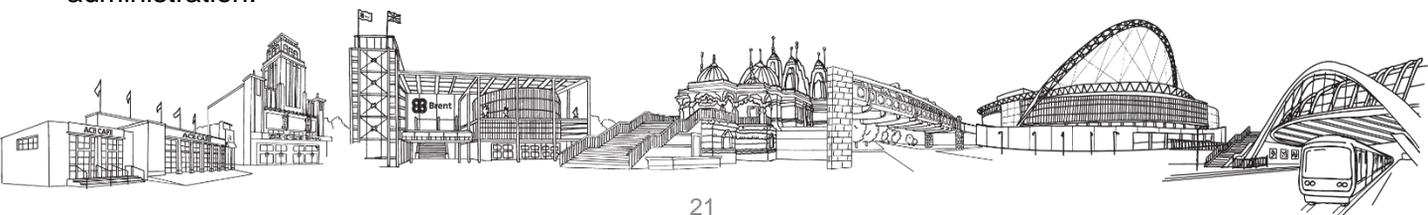
Every year businesses receive a request for business rates. We will send out a newsletter to each business with their business rates request letter with suggestions about how to prepare for Brexit, including information about the EU Settlement Scheme, importing and exporting, and where to find changes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

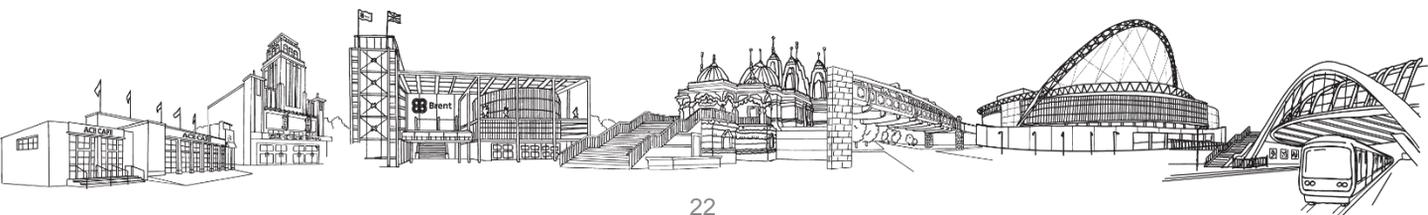
Although we don't receive other funding from the European Social Fund (ESF), there will be projects in Brent and London which do. When this funding finishes, these projects, and the support they provide might also end. The quality of these programmes is unknown.

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.

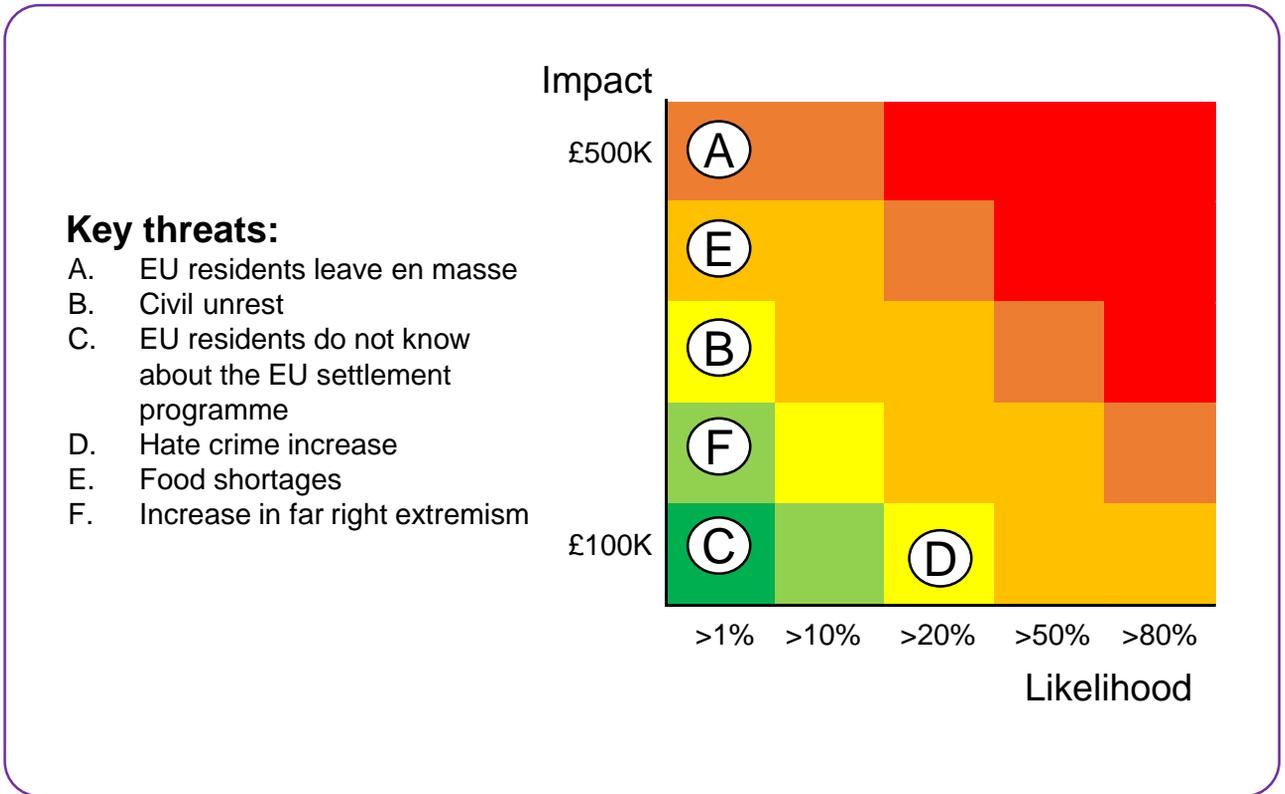
London currently benefits from ESIF funding totalling £581m. We do not know how much of that is for services in Brent, but do know that charities which provide vital services to our residents currently receive EU funding, and may be impacted as a result of Brexit. One of these charities is Crisis who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

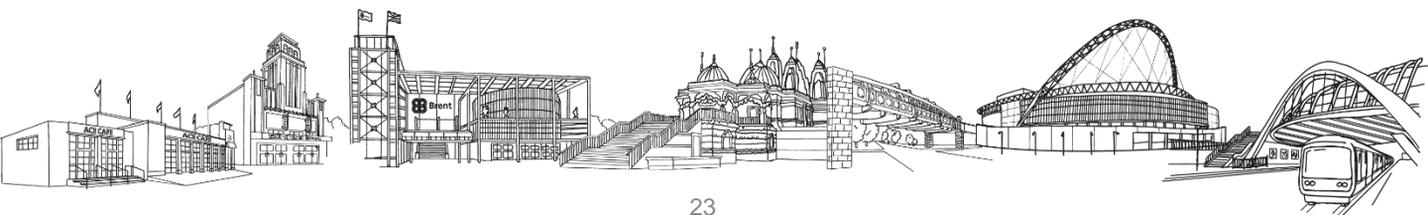


## 7. Community engagement



### 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.

In 2019 hate crime was decided as, and continues to be, 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.

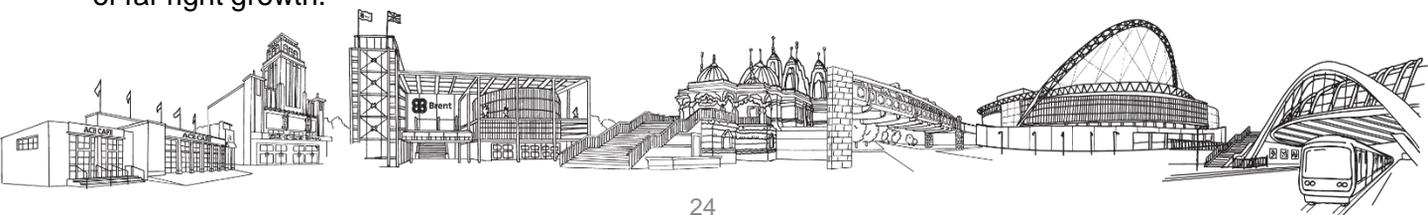
## In detail

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:

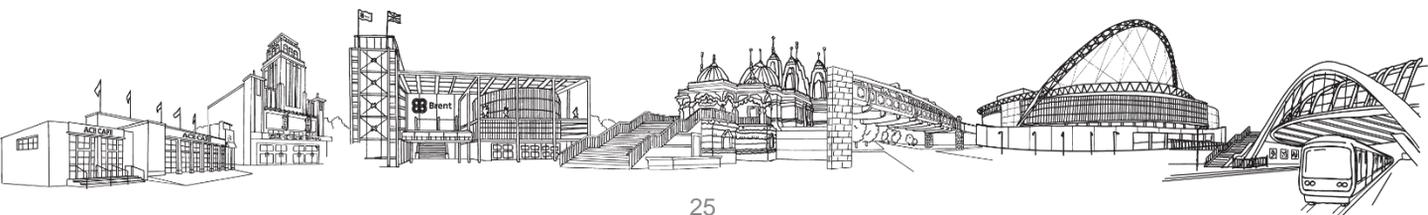
- Work with the Eastern European Network and other local organisations providing services to European residents to provide information and engage with residents
- Work with local and specialised organisations to provide information, support and assistance to European residents
- Work with neighbouring 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 50,104 EU citizens registered to vote. The proportion of the electorate that is European varies from 14% in Kenton and Northwick Park, up to 28% in Willesden Green 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. They will be able to vote in the postponed mayoral elections in 2021 (as these elections should have taken place during the transition period). Bilateral voting rights have been agreed with Spain, Portugal, Luxemburg and Poland, and the government are working to agree equivalent bilateral rights with other countries in the EU. Once voting rights have been decided, we will write to all European citizens registered to vote with an explanation of these rights, and, if the EU Settlement Scheme is still open for applications, include details of how to register, 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.

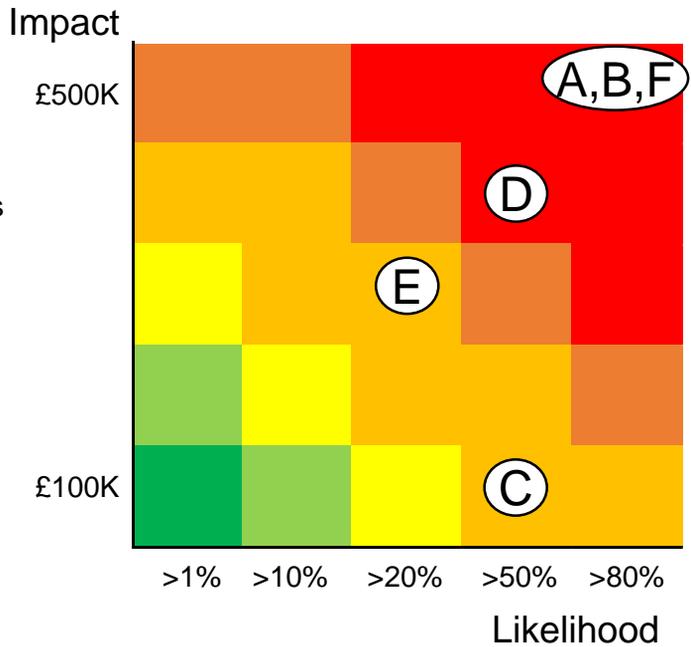
Another possible issue is the repatriation of the deceased. Should there be delays at borders, this will be particularly distressing to families affected, and may affect certain faiths which require a prompt burial. Currently we have between 20 and 30 repatriations each year.



## 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

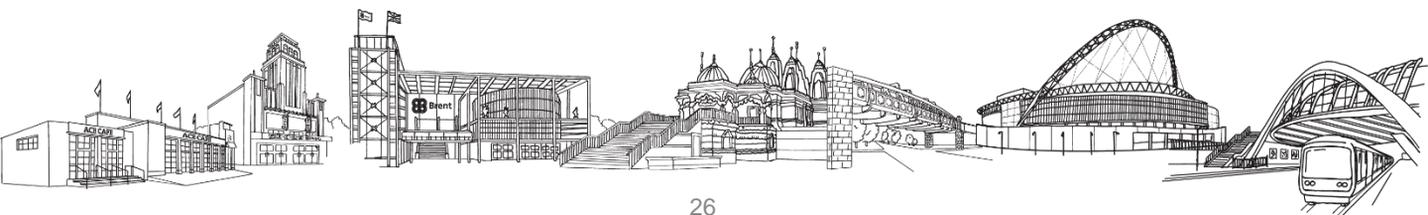


### Key opportunities:

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

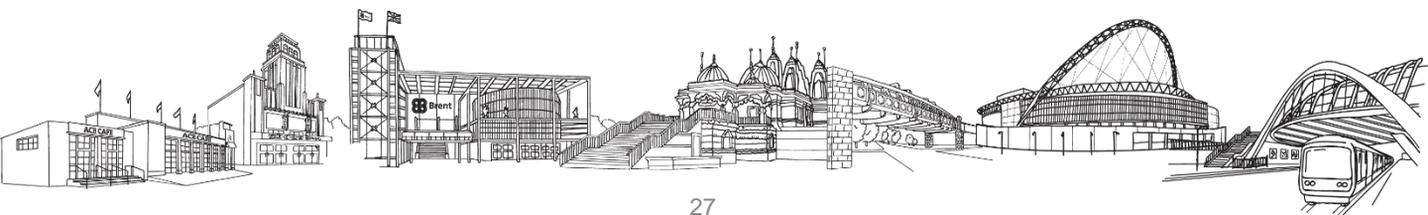
Brent has a number of capital projects whose viability relies on house prices delivering a return which finances the development. Brent is also reliant on the private sector to bring forward schemes which provide private housing for sale, private housing for rent or shared ownership, and affordable housing. 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 trade 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. The new points based immigration system 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 trade deal will affect sourcing of construction materials from the EU, which may incur a tariff and take longer to process, delaying the construction process.

Exports of animal products to the EU, from 01 January 2021 will require an Export Health Certificate (EHC). There may be other tariffs 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.

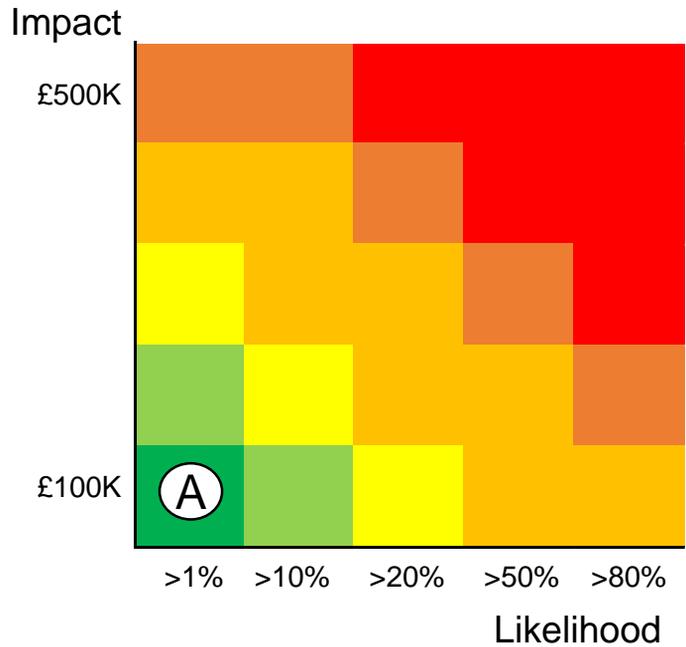
Large companies may relocate, taking their jobs with them. Some employees may move with them. Others may get new jobs or be unemployed. Depending on the impact on the economy other businesses may fold. If the economic base of the Borough contracts there would be a loss of business rate income to the 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

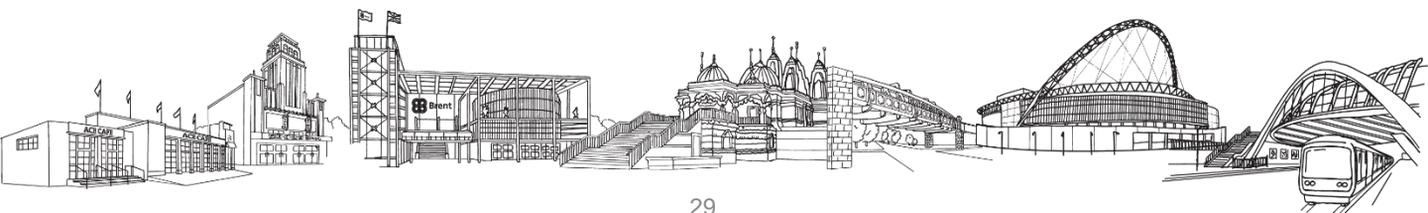
### Key threats:

- 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

Now the UK has left the EU arrangements for data protection remain the same. There is no change in the UK's own data protection standards because the Data Protection Act 2018 remains 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

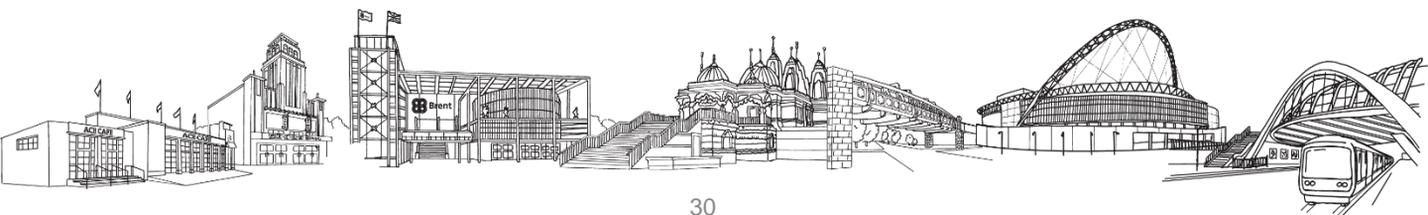
The European Commission will not make an adequacy decision regarding the UK at the point of exit. It has stated that the UK needs to become a "third" country before any adequacy decisions can be made. If we have personal data either processed by, or stored with organisations established in the EU (including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

All our data are stored and processed in the UK apart from one small area, and work has been done to ensure that we will still have access to these after the transition period has ended.

Earlier this month (November 2020), the government published its new National Data Strategy. It wants to "unlock the power of data for the UK" and sets out five "priority areas of action":

- Unlocking the value of data across the economy
- Securing a pro-growth and trusted data regime
- Transforming Government's use of data to drive efficiency and improve local services
- Ensuring the security and resilience of the infrastructure on which data relies
- Championing the international flow of data

We are still waiting for adequacy from the EU. The EU may not accept the UK's current stance on having enough protections for sharing data with the UK – this is mainly because the UK may enter into agreements with other countries such as the US, which are not deemed adequate by the EU.



## 10. EU settlement Scheme

There are 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. So far (up until 30 September 2020) 91,900 Brent residents have applied to 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](mailto: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.

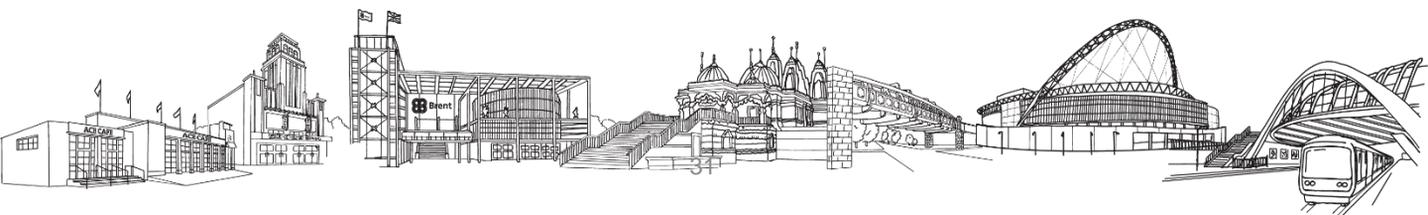
We provide information sessions for staff, for in frontline service team meetings, and for all staff in lunch and learn sessions. At these tailored information sessions, staff find out about the EU settlement scheme and how it relates to their service area.

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 2019, providing free advice and guidance to our EU Londoners.

On Monday 07 October 2019 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.



## In detail continued

We have developed a community champions scheme; one of their objectives is to spread word about the EU settlement scheme to their communities. As well as getting the message out there, these community champions have advised us on our materials, including a leaflet which was sent to all households in Brent in January 2020 and an infographic which will be released soon.

In March and April of 2020 we had a number of outreach events planned, including a joint one with Harrow. These events unfortunately had to be cancelled due to Covid. During lockdown, on 30 June 2020, we ran an online event in conjunction with Settled. We plan to run two more online events over the next few months.

We are also putting together a video which will be translated into different languages and published along with the infographic. As the transition period draws to a close, we will up our messaging urging EU nationals to apply to the scheme.

The [Migration Observatory](#) has put together a list of groups of people who may not be aware the scheme exists. Over the next few months, we will look at each of these groups and see what else we can do to support them. They are:

- Very long term residents
- People with permanent residence
- Children of EU citizens
- People who have been rejected for permanent residency in the past
- People with past criminal convictions
- People without good social networks
- EU citizens born outside the EU
- People who are expecting to return home
- Victims of domestic abuse
- Victims of modern slavery
- People living in poverty
- Homeless people and rough sleepers
- Migrant Roma communities

