

**SCC End of Transition Impact Assessment for OSMC 17.12.2020**

**WIDER SHEFFIELD IMPACTS**

	<b>Areas of Exposure / Risks / Threats</b>	<b>Potential Impact</b>	<b>Mitigations in Place</b>	<b>Additional Actions</b>
<b>Procurement &amp; Supply Chain</b>				
	Supply chain slowing	People may struggle to get the goods or services at the speed or price they are used to.	Central Government responsibility	
	Risk of business supply chains being delayed.	LRF estimate puts the paperwork at three times the amount after being in the EU. We have already seen delays in UK ports, specifically Felixstowe Port which is thought to be a combination of delays from PPE and end of EU transition stockpiling.	Central Government responsibility;  Local business support to help businesses prepare.	
<b>Impact on individuals</b>				

	<p>- Foodbanks</p>	<p>Foodbanks are currently looking at higher demands due to COVID-19. End of transition period will likely mean less stock for those foodbanks as supply becomes more difficult and higher demand with unemployment expected to rise.</p>	<p>Covid means there is improved coordination within the city in relation to foodbanks. Foodbanks work in different areas of the city and some of the larger foodbanks were storing food for the smaller ones who do not have the space. Have built up relationship with a supplier during Covid.</p>	<p>SCC can prepare with a supplier in case of supply difficulties for food supply to be brought into the city for foodbanks and to coordinate as during Covid.</p>
	<p>- Food</p>	<p>Impact on school meals, lunch clubs, those who are struggling to afford food currently are likely to suffer if prices rise.</p>	<p>See City Council tab, row 34 for mitigations for school meals. Local Community Response Teams are equipped to be able to supply food for those who are vulnerable if required.</p> <p>Broader food supply chain issues are a Government responsibility</p>	

	- Behaviours eg. Stockpiling	Hoarding/panic buying, stockpiling could lead to interim shortages in products and specifically those which are imported from Europe. Covid highlighted that panic buying can strain supermarkets when they are not prepared for higher demand. Hoarding medicines and impact on health resources to deal with the panic. Rise in cost of medicines and associated products.	<p>We have received assurance on medicine supply chains via NHS England (see also city council tab, row 37 for more detail).</p> <p>Local Community Response Teams will be able to supply food and other essentials to those who are vulnerable if needed.</p>	
	- Fuel disruption	As above, higher transport prices, effect on community transport provision rationing. Increases in utility bills could lead to health and well-being issues.	LRF Fuel Plan in place	
<b>Economic Regeneration</b>				

	<p>- Access to future EU Funding Mechanisms</p>	<p>All funding guarantees end at the end of 2020 except those who directly applied for EU project funding. This could impact on voluntary organisations and the universities.</p>	<p>The guarantee ensures that UK organisations, such as charities, businesses and universities, will continue to receive funding over a project's lifetime if they successfully bid into EU-funded programmes before the end of 2020. For awards where UK organisations successfully bid directly to the European Commission on a competitive basis, the UK government will work with the Commission to ensure that UK organisations will be able to continue to participate. The guarantee covers funding committed to UK organisations. It does not cover funding committed to partner and participants in other Member States and other participating countries. This means that where a UK organisation is the lead member of a partnership, any funding it distributes to non-UK associated beneficiaries is not covered by the guarantee.</p>	
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	<p>- Business Impact</p>	<p>Range of potential implications for local businesses and some specific sectors, in particular:</p> <ul style="list-style-type: none"> <li>- Tariffs (see also customs procedures): no progress made on the UK tariff regime which will impact on the goods. Free movement of goods would disappear so require tariffs, standards and checks. Significant implications for supply chains.</li> <li>- Food/meat/plant supply chains: exporters will need approval to export any product to the EU</li> <li>- Logistics and hauliers: If no new arrangements are in place by end of year, it will be permit based with a limit on the number of permits issued.</li> <li>- Data sharing (also applicable to Information Sharing): EU Commission has to rule on UK data</li> </ul>	<p>Business Support measures in place via Business Sheffield and Sheffield Chamber</p>	
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		protection regime being adequate to allow to send personal data to UK. Work on this can't start until UK has left. Implications for BPFs, CDI sector and SMEs.		
<b>Banking, Insurance &amp; Financial Services</b>				

	Costs associated with Brexit for Businesses	Extra impact of costs where businesses are already suffering from the impacts of Covid, two national lockdowns and tiers system.	There is little local mitigation that can be put in place. We are encouraging all eligible businesses to apply for one of the Covid business grant schemes.	
	- Currency Volatility (address the risks posed by currency volatility (budget risk, supplier risk, operational risk)?	Currency volatility will impact on those who import/export from the EU. Also some businesses will be impacted by cost rises from raw materials imported.	There is little local mitigation that can be put in place. We are encouraging all eligible businesses to apply for one of the Covid business grant schemes.	
	- Investment portfolio, pensions, loans and borrowing (interest rates)	There is a sense that the Government want to maintain the UK as an attractive place to do business and invest (FDI).	It is anticipated that any borrowing rates will be kept low to encourage investment and borrowing both in terms of FDI and local authority borrowing (PWLb). This interpretation was before Covid which brings more uncertainty due to the economic disruption. The cost of borrowing will be more uncertain and the rates subject to higher volatility.	
<b>Trading</b>				

	- Customs procedures	Not a direct impact on Sheffield as not a port, however, may impact on the items which need to go through customs to reach Sheffield.	No Sheffield mitigation possible.	
<b>Legal Considerations</b>				
	- Regulations & Standards	UK standards and regulations may begin to diverge from those which are currently common with Europe - longer term concern for trade.	No Sheffield mitigation possible.	
	- Customer safety, food safety and regulations and enforcement		Environmental Health will continue to ensure compliance with all current standards, which will continue in line with existing EU law in the immediate future. Divergence from EU standards may take place at a later point.	

	<p>- EU Legislation – UK translation</p>	<p>This risk is in relation to the exit from the European Union however the mitigation ensures that at the end of the transition period will not result in any abrupt loss of legal rights.</p>	<p>European Law (Withdrawal) Act 2018 became law on 26th June 2018. The Act ends the supremacy of EU law in the UK, converts EU law as it stood at the moment of exit into UK domestic law, and preserves laws made in the UK to implement EU obligations. The Act also enables domestic law to reflect the content of the Withdrawal Agreement under Article 50 of the Treaty on EU once the UK leaves the EU, subject to prior enactment of a statute by Parliament approving the final terms of withdrawal. The principal purpose of the Act is to provide a functioning statute book on the day the UK leaves the EU. The power to correct problems arising from withdrawal is capable of being used to transfer to public authorities in the UK, functions that are currently exercised by EU authorities. The same rules and laws will apply on the day after exit, as on the day before. The Act does not aim to make major changes to policy or establish new legal frameworks in</p>	
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			the UK beyond those which are appropriate /necessary to ensure the law continues to function properly from exit day.	
<b>Workforce &amp; Staffing (HR related)</b>				

	<p>- Workplace Rights</p>	<p>See Legal section and specific comments relating to the translation of EU Law in UK Law as per the terms of the European Law (Withdrawal) Act 2018. Under this provision, all workplace rights will be adopted and maintained under UK law.</p>	<p>From the Government Technical Note - The EU (Withdrawal) Act 2018 brings across the powers from EU Directives. This means that workers in the UK will continue to be entitled to the rights they have under UK law, covering those aspects which come from EU law (including those listed above except where caveated below). Domestic legislation already exceeds EU-required levels of employment protections in a number of ways. The government will make small amendments to the language of workplace legislation to ensure the existing regulations reflect the UK is no longer an EU country. These amendments will not change existing policy. This will provide legal certainty, allowing for a smooth transition from the day of EU exit, and will ensure that employment rights remain unchanged, including the employment rights of those working in the UK on a temporary basis, except where set out below.</p> <ul style="list-style-type: none"> <li>•Employer Insolvency: Currently,</li> </ul>	
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			<p>UK and EU employees working in the UK are protected under the Employment Rights Acts 1996 and Pension Schemes Act 1993 (or the relevant legislation in Northern Ireland on employment rights and pension schemes) implementing the Insolvency Directive, with procedures in place for making claims in the case of employer insolvency. Similarly, UK employees working in an EU country are protected by the laws of that country that implement the directive.</p> <ul style="list-style-type: none"><li>•European Works Councils: Currently EU law allows for workers to request, in certain circumstances, that their employer establishes a European Works Council to provide information and consult with employees on issues affecting employees across two or more European Economic Area states. These rules are set out in the European Works Council Directive (2009/38/EC). The statutory framework that applies to European Works Councils would</li></ul>	
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			require a reciprocal agreement from the EU for them to continue to function in their present form within the UK.	
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	<p>- Retain/attract EU nationals</p>	<p>From an employment perspective, it is not anticipated that the impact will be significant. What is not certain during these uncertain times, is how many EU nationals have decided not to stay or not to come to the UK in the first place because of the UK leaving the EU. Increasingly unemployment is look to rise so this could cause community issues.</p>	<p>Business Support measures in place via Business Sheffield and Sheffield Chamber.</p>	
	<p>Settled Status of EU nationals/workforce</p>	<p>There is a risk that COVID has distracted from the need to apply for this. EU Settlement Status applications, important to apply for EU Citizens across Sheffield. Risk that not all employers will emphasise the importance and the vulnerable may miss out.</p>	<p>The resource available on the Gov.uk website guides EU citizens through the process of applying to remain in the UK. As per the Withdrawl Agreement, existing EU citizens will retain their residency and employment rights (subject to Settled Status application). SCC secured £90k funding from the Home Office to support all EU nationals to apply for 'settled status', especially the most vulnerable.</p>	

<b>Community Cohesion</b>				
	<ul style="list-style-type: none"> <li>- Risks of rising community tensions</li> </ul>	<p>Risk of end of the transition period becoming a focal point for community tension.</p>	<p>We will work with the Police to identify any potential risks or known issues.</p> <p>Structures in place re reporting, cohesion overview and serious incident handling including hate crime reporting centres.</p> <p>Community cohesion already pressured by COVID and disparities in the communities.</p>	
<b>Environmental Regulation; Trading Standards &amp; Environmental Health</b>				

	Safety of Goods and standards	No longer bound by EU regs post 29th March - majority of UK legislation currently has its origins/relies upon EC Directives. Examples of potential impact on the city include health and safety standards, food safety standards, animal health and point of origin, fair trading and consumer protection - Further question regarding standards being compromised if border officials have to 'wave goods through' due to lack of capacity	No Sheffield mitigation possible, although Regulatory Services team will work to ensure the safety of goods and compliance with relevant standards. At present Sheffield has few direct food exporters to the EU. We do have some with mainly non EU export where we already issue certification.	
<b>Schools &amp; Young People</b>				
	- Continued provision of school meals and access to schools for children.	Anticipated that there will be limited initial impact on children at schools or applying for them. However, COVID has led to difficulties in relationships	See City Council tab, row 34 for mitigations for school meals.  Broader food supply chain issues are a Government responsibility	

		and greater need for food support for some families - monitor.		
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	<p>- Schools places and teachers qualifications</p>	<p>No change to those who can apply for English schools. Applications for a school place can be made from overseas by those with a right of residence in the UK, but admission authorities and local authorities may require an applicant to provide proof of residence in the UK so that schools can apply their admission arrangements.</p>	<p>EU, EEA, EFTA and Swiss professionals whose qualifications have been recognised before 29th March 2019, or who have applied for a recognition decision before that time, will retain this right in a no deal exit.</p> <p>The Government has stated that after the UK leaves the EU, professionals with EU, EEA, EFTA or Swiss qualifications, including teachers, will still have a means to seek recognition of their professional qualifications through a new system. Further information on this new system will be published on GOV.UK</p> <p>- In a no deal scenario, the requirement for EEA professional regulating authorities to share details of any sanction or restriction imposed on teachers will no longer apply. This means the Teaching Regulation Agency will no longer maintain details of those teachers who have been sanctioned in EEA member states. Keeping Children Safe in Education statutory safeguarding guidance will be</p>	
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			updated shortly to advise schools and colleges about how an EEA's regulator's assessment of a teacher's professional competence can be check in future.	
<b>Medicines</b>				

	Medicines and medical products	Availability is key as many medicines cannot simply be altered or gone without without a significant impact on those who use it.	NHS England are responsible for this and have provided assurance on the continuity of the medicines supply chain	
<b>Information Sharing</b>				

	<p>- Risk to access to information and systems</p>	<p>This may be an issue for businesses and other organisations that process data in the EU.</p>	<p>In the context of Information Sharing (GDPR)</p> <p>The Data Protection Act 2018 came into force in the UK at the same time as the GDPR took effect. It covers four data protection regimes:</p> <p>1.Part 2, Chapter 2: General processing – the GDPR – this chapter supplements the GDPR so that it operates in a UK context.</p> <p>2.Part 2, Chapter 3: Other general processing – this chapter applies a UK version of the GDPR (the “applied GDPR”) to those areas outside the scope of EU law, such as defence.</p> <p>3.Part 3: Law enforcement processing – this chapter brings into UK law the EU Data Protection Directive 2016/680 (the Law Enforcement Directive).</p> <p>- The ICO has produced a 6 step check list for UK businesses and organisations to follow in the event of a 'no deal' Brexit:</p> <p>1) Continue to comply and apply GDPR standards and follow current</p>	
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			<p>ICO guidance</p> <p>2) Data transfers to the UK - review of data flows and where (if) SCC receives data from the EEA and safeguards that can be put in place to ensure that data can continue to flow once UK leaves the EU</p> <p>3) Data transfers from the UK - review data flows and identify where an organisation transfer data from the UK to any country outside of the UK, as these will fail under new UK transfer and documentation provisions.</p> <p>4) If an organisation operates across Europe, review the structure, processing operations and data flows to assess how the UK's exit from the EU will affect the data protection regimes that apply.</p> <p>5) Review privacy information and internal documentation to identify any details that will need updating when the UK leaves the EU</p> <p>6) Organisational awareness - key people aware of the issues and that these are factored in to 'no deal' Brexit planning</p>	
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			For mitigation in terms of SCC data processing, see City Council tab.	
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	<ul style="list-style-type: none"><li>- Risk to alignment of data and integrated systems</li></ul>	<ul style="list-style-type: none"><li>- Data sharing (also applicable to Information sharing): EU Commission has to rule on UK Data protection regime being adequate to allow to send personal Data to UK. Work on this cannot start until UK has left. Implications for BPFS, CDI sector and SMEs (alternatives will be very expensive).</li></ul>		
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**SCC End of Transition Impact Assessment for OSMC 17.12.2020**

<b>CITY COUNCIL</b>				
	<b>Areas of Exposure / Risks / Threats</b>	<b>Impact</b>	<b>Mitigations in Place</b>	<b>Additional Actions</b>
<b>Procurement &amp; Supply Chain</b>				
	Limited access to Goods	As a council we predominantly contract with UK companies, however contractors may well obtain goods from EU countries. Potentially Brexit contingency stock may have been used to deal with the Covid situation.	Ongoing discussions with current suppliers to establish how prepared they are for a 'No deal' Brexit to identify any areas of concern.	Regular contact with suppliers to discuss potential impact which is then built into the activity we undertake.
	Increased costs	The majority of our contracts are on a fixed price basis, meaning that we may be able to defer any impact on cost until a re-tender. Need to consider the timing of tendering to ensure high	Reviewing forward plan of procurement activity with Directors of Business Strategy to agree prioritisation.	

		costs aren't baked in longer term.		
	Supplier unable to supply unless a cost increase is agreed	Suppliers may experience goods or labour shortages or cost increases due tariffs and currency fluctuations and use this as a Force Majeure or reason to not supply goods and/or services without passing on price increases, particularly where the only remedy for the council would be litigation for breach or re-negotiation. This would need to be managed on a case by case basis.	Undertake negotiation with suppliers when presented with requests for increase as per BAU practice, however our only course of action would be to re-tender the activity which would bring forward the impact of the above	
	Economic recession	Increase inflation that impacts on all businesses would then have an impact on increased costs to SCC. Market shrinkage due to business failure either as a result of Brexit and/or Covid.	Limited opportunity to mitigate the impact of this. All procurement activity to fully review what is bought, how is it specified and providing commercial challenge to all activity	

<b>Contingency planning around supporting critical activities</b>				
	Disruption to fuel supply for key services	Some services may be disrupted without access to fuel.	We are in the process of reviewing the LRF Fuel plan: we have been in contact with Transport services and have information as to who is drawing fuel i.e. the list that is in the plan is “normal Business as usual , in a Covid context, and reviewing their criticality. We are also in the process of reviewing the “processes” that are in the plan to ensure they can be delivered in a Covid safe way.	
<b>Customer Behaviours</b>				
	- Food – potential less choice	Increased risk of poor health	Strong communications and planning. Work with VCF and communities	Need to have Public Health involved ; Needs Brexit adding to Health and Wellbeing Board Agenda
	- Generic Customer Behaviours (i.e. stockpiling)	Community Tensions	Healthy eating and cooking. Long term grow your own, good comms and community messages from health professionals	Need Public Health involved; need to link in Community Safety - further Street Wardens are being employed

	- Fuel disruption	Risk of panic buying of fuel. Potential disruption to the supply chain. Border delays could affect local fuel disruption. There will not be wider national-level oil shortage.	Customer behaviour viewed as more likely reason for problems. Communications and messaging. LRF have a Fuel Plan – which also covers the supply of fuel to critical sub contractors. National fuel preparedness arrangements in place by BEIS.	
<b>Banking, Insurance &amp; Financial Services</b>				

	Financial costs of Brexit		<p>Brexit funding settlement details announced 28.01.19: HMT announced in December that MHCLG would receive £35 million to prepare for Brexit. MHCLG has now added an extra £21.5 million funding using finance from its 2018/19 budget.</p> <p>Local authorities across England will receive a share of this £56.5 million to help support preparations for Brexit</p> <p>Councils receive £20 million 2018/19 financial year and £20 million in 2019/20 to spend on planning and strengthening resources</p> <p>A further £10 million will be available in the 20/21 financial year. This funding is intended to help LA's with specific costs which may arise following Brexit.</p> <p>A further £5 million will be split by teams in the Ministry of Housing, Communities and Local Government, local authorities and LRF's for specific purposes such as strengthening preparations and supporting communities. This</p>	
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			<p>works out at £210k for SCC (£105k in both 2018/19 and 2019/20) - for CA's this is £91k per year. Funding is held in reserve with allocation approved by EMT.</p>	
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	<ul style="list-style-type: none"><li>- Investment portfolio, pensions, loans and borrowing (interest rates)</li></ul>		<ul style="list-style-type: none"><li>- There is a sense that the Government want to maintain the UK as an attractive place to do business and invest (FDI). It is anticipated that any borrowing rates will be kept low to encourage investment and borrowing both in terms of FDI and local authority borrowing (PWLB).</li><li>- The cost of borrowing will be more uncertain and the rates subject to higher volatility.</li></ul>	
<b>Legal Considerations</b>				

	Future acts and parliamentary legislation		<p>Even though many of our current laws had their basis in European regulations, this does not mean that there will be huge gaps in the laws under which the country operates as most of the provisions were enacted under our own system of laws. Depending on the terms of any eventual agreement the country may be able to depart from those rules in future if it chooses to do so, and the government currently plans to end those arrangements which rely on reciprocity (e.g. provisions for co-ordinated cross border action on consumer protection) but most will continue to apply for now. For now the government has been publishing updated statutory instruments and guidance across a wide range of areas in relation to which rules may apply from 1/1/21. Legal Services to monitor any new provisions.</p>	
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	Service of care proceedings abroad		Any and all mitigations would need to follow the correct international protocols following the end of transition. The UK is a party to the Hague Service Convention in its own right, and this would apply in the event of no deal. There would be little effective change as the convention is similar to the EU Service Regulation, although it is not as modern and is therefore likely to be less efficient.	Legal Services to monitor any changes to the process for liaising between countries and Court jurisdictions.
	Risk of child abduction		All mitigations would need to follow the correct international protocols following the end of transition. The UK is a party to the Hague Service Convention in its own right, and this would apply in the event of no deal.	
<b>Workforce &amp; Staffing (HR related)</b>		-		
	- EU Citizens (percentage of workforce)	Employees have until 30th June 2021 to obtain EU settled scheme status. However over the longer term we may have difficulty	SCC secured £90k funding from the Home Office to support all EU nationals (across Sheffield not solely SCC staff) to apply for	We have a 98% completion rate of nationality information for SCC employees and have identified 67 employees who will need to obtain

		in recruiting ex-EU nationals into critical roles.	'settled status', especially the most vulnerable.	EU settled scheme status. 41 employees have already done this.
	- Employment of EU nationals	-	From an employment perspective, on day 1 of Brexit, it is anticipated that the impact will not be that significant. The resource available on the .Gov website guides EU citizens through the process of applying to remain in the UK and we can promote this information and if necessary provide support to individuals to help them with this. As per the Withdrawal Agreement, existing EU citizens will retain their residency and employment rights (subject to Settled Status application). What is not certain during these uncertain times, is how many have decided not to stay or not to come in the first place. As unemployment figures are the lowest since 1975 (at the time of writing), SCC are already experiencing problems filling	SCC considering whether to become a registered employer for EU nationals (decision needed by June 2021).

			certains vacancies, in particular in the social work arena.	
	Impact on service delivery partners that are reliant on EU nationals to deliver commission services on behalf of SCC	-	<ul style="list-style-type: none"><li>- Work is currently underway to understand the extent of EU nationals involved in SCC service provision e.g. care workers/assistants.</li><li>- Potential implications for delivery of contractual commitments and cost of contracts, the impact/scale of this is currently being assessed.</li><li>- A request has been made to all contracted/commissioned service</li></ul>	

			providers to provide details of the number of EU nationals contracted to deliver SCC services.	
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	- Workplace Rights	-	<p>From the Government Technical Note - The EU (Withdrawal) Act 2018 brings across the powers from EU Directives. This means that workers in the UK will continue to be entitled to the rights they have under UK law, covering those aspects which come from EU law (including those listed above except where caveated below). Domestic legislation already exceeds EU-required levels of employment protections in a number of ways. The government will make small amendments to the language of workplace legislation to ensure the existing regulations reflect the UK is no longer an EU country. These amendments will not change existing policy. This will provide legal certainty, allowing for a smooth transition from the day of EU exit, and will ensure that employment rights remain unchanged, including the employment rights of those working in the UK on a temporary basis, except where set out below.</p> <p>Employer Insolvency: Currently, UK</p>	
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			<p>and EU employees working in the UK are protected under the Employment Rights Acts 1996 and Pension Schemes Act 1993 (or the relevant legislation in Northern Ireland on employment rights and pension schemes) implementing the Insolvency Directive, with procedures in place for making claims in the case of employer insolvency. Similarly, UK employees working in an EU country are protected by the laws of that country that implement the directive.</p> <p>European Works Councils: Currently EU law allows for workers to request, in certain circumstances, that their employer establishes a European Works Council to provide information and consult with employees on issues affecting employees across 2 or more European Economic Area states. These rules are set out in the European Works Council Directive (2009/38/EC). The statutory framework that applies to European Works Councils would</p>	
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			require a reciprocal agreement from the EU for them to continue to function in their present form within the UK.	
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	Settled Status of EU nationals/workforce		<p>The UK government will continue to work with the devolved administrations to ensure workers' rights continue to operate across the UK.</p> <p>SCC has continued to support EU nationals in its workforce to apply for settled status and will encourage all to do so before the deadline of June 2021</p>	
<b>Community Cohesion</b>				

	-Community tensions	<p>- Long standing, complex issues and relationships that span neighbourhoods and groups that need to be taken account of and includes rise in the number of hate crimes committed as seen in other cities following the referendum</p> <p>- Evidence that Brexit has had an impact on standards of what is deemed as acceptable to say to people from different backgrounds/communities (tone of Brexit debate nationally/in Parliament, immigration debate, rise of populism)</p> <p>Community cohesion seems to have been heightened as a risk by COVID with disparities increasing and impacts unequal.</p>	<p>We will work with the Police to identify any potential risks or known issues.</p> <p>Structures in place re reporting, cohesion overview and serious incident handling including hate crime reporting centres.</p> <p>Community cohesion already pressured by COVID and disparities in the communities.</p>	<p>Strong comms with VCF and a visible presence in affected areas, joint messaging being developed around hate crime</p>
	Community safety		Structures in place re reporting, cohesion overview and serious	

			incident handling including hate crime reporting centres	
<b>Environmental Regulation; Trading Standards &amp; Environmental Health</b>				

	<p>- Regulations for enforcement</p>		<p>Most if not all EU regulations affecting the UK while we were members was translated into UK legislation which remains in effect notwithstanding the departure from the EU and the end of the transition period, and will remain in effect until the UK legislature decides otherwise and decides on a different regulatory approach. It will then need to change the law in the usual ways. The scope for and speed of the change of regulation is likely to be affected by whether or not there is a Brexit deal, but there will not be an immediate difference in regulatory frameworks from 1.1.21 (with the exception of matters involving borders – the crossing of them by goods, people and data). Enforcement officers and prosecutors will need to be aware of such changes as they come along but in terms of cases already underway it should be remembered that you prosecute for conduct at a fixed point in time in the past which breached the law as it stood then, not in relation to</p>	<p>Legal Services to monitor legislation trackers and status of negotiations to predict likely future changes. Any changes to legal requirements will need to be reflected by review and incorporation of those changes in our Environmental Regulation and specifically TS enforcement and advice; documents, policies, procedures, guidance etc. Any changes will require updates and training. Such training is required before accurate business advice can be provided or enforcement carried out. Training difficult without certainty as to what, if any, legal changes are made to each specific piece of legislation eg CE mark replacement (safety), e-mark replacement (average quantity).</p>
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			<p>the state of the law on the day you are in Court. A change in the law might affect a decision about whether continuing to prosecute a past offence is in the public interest, but it would not mean that you would have to stop all cases before the Court.</p>	
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		<p>UK Trading Standards will lose access to Alert intelligence information regarding unsafe products shared by EU enforcement bodies currently. The recent PPE crisis, where unsafe PPE was being sold and identified by other EU countries such that Trading Standards ports &amp; borders teams could intercept goods, illustrates the consequences of losing this capability. This places increased burden on LA's to spot and deal with non-compliant product.</p>	<p>New arrangements in place to share information on unsafe construction and consumer products amongst UK trading Standards enforcement bodies, have replaced (RAPEX) EU system.</p>	<p>Procurement due diligence checks agreed to ensure only safe products are purchased.</p>
<p><b>Schools &amp; Young People</b></p>				

	<p>- Continued provision of school meals on the basis of unknown custom arrangements for food produce entering the UK</p>	<p>Post-2020 contract will clearly need to reflect any significant changes to the supply chain.</p>	<p>- Number of ingredients meeting industry standards (e.g. Red Tractor) are sourced in the UK – meat, eggs, milk and seasonal vegetables can/are sourced within the UK however demand for fresh and perishables will outstrip supply if border delays are experienced. Retailers and food wholesalers are warning of food shortages of fresh and perishable imports All other supplies are sourced by Taylor Shaw's (company holding schools meals contract) parent company, Ellior. Multi-national company that is working with suppliers on contingency planning. Confident that they will be able to source suppliers given the volume of business they handle for the education and care sectors across Europe. One of the requirements of the contract is that there is a comprehensive contingency plan for loss of essential services. In the short term this would mean trimming down menus, altering them to suit available supplies.</p>	
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			<p>Brexit scenario will become one of the Risk and Issues that is monitored at monthly Service Board, starting in September for forthcoming academic year. Consultation and procurement plan for school now being prepared so that there is a new contract arrangement in place from 1st August 2020. All contracts procured using the OJEU process and this will need to be taken into account.</p>	
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	<p>- Schools places and teachers qualifications</p>		<p>- Any child living in the UK can apply for and access a school place in England irrespective of migration status. This will continue after the UK's exit from the EU. In England schools do not take into account either immigration status or nationality and so must not deny a child a place on the basis of their nationality or migration status. In a no deal scenario, EU, EEA, EFTA and Swiss nationals living in the UK by 29th March 2019 can remain in the country and access benefits and public services, including education, on broadly the same terms as now. Receipt of certain benefits might also qualify families for free school meals. The right of Irish nationals to access education in England/UK will be protected under the Common Travel Area. Applications for a school place can be made from overseas by those with a right of residence in the UK, but admission authorities and local authorities may require an applicant to provide proof of residence in the UK so that schools</p>	
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			<p>can apply their admission arrangements.</p> <ul style="list-style-type: none"><li>- UK nationals returning from the EU should be considered for admission to a school on the same basis as people living in the UK.</li><li>- Currently EU, EEA, EFTA and Swiss nationals have the right to have their professional status and qualifications considered before for the award of Qualified Teacher Status in England.</li><li>- EU, EEA, EFTA and Swiss professionals whose qualifications have been recognised before 29th March 2019, or who have applied for a recognition decision before that time, will retain this right in a no deal exit.</li><li>- The Government has stated that after the UK leaves the EU, professionals with EU, EEA, EFTA or Swiss qualifications, including teachers, will still have a means to seek recognition of their professional qualifications through a new system. Further information on this new system will be published on GOV.UK</li></ul>	
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			<p>- In a no deal scenario, the requirement for EEA professional regulating authorities to share details of any sanction or restriction imposed on teachers will no longer apply. This means the Teaching Regulation Agency will no longer maintain details of those teachers who been sanctioned in EEA member states. Keeping Children Safe in Education statutory safeguarding guidance will be updated shortly to advise schools and colleges about how an EEA's regulator's assessment of a teacher's professional competence can be check in future.</p>	
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	Schools	In addition to the risks regarding SCC suppliers there are also risks which lie with the schools.	Much of the data protection issues can be advised upon by SCC but specifics have to be looked at within the individual schools themselves. Mitigate through education communications and utilising the expertise of relevant SCC departments where appropriate.	
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	<p>- Children's social care</p>		<ul style="list-style-type: none"> <li>- Consideration given in response to DfE questions sent out to LA's last year (2018). Overall impact would seem to be limited and SCC have to date, not received any specified concerns e.g. no concerns raised by LAC children's parents or no concerns raised by people seeking to foster or adopt EU children.</li> <li>- Question posed by DfE re how LA's handles cross border child protection cases (both EU and non-EU)</li> <li>- Usual course of action is to use the International Child Abduction &amp; Contact Unit (ICACU) - Non-EU cases is mostly about information sharing/questions of jurisdiction.</li> <li>- Use Hague convention and usually triggered by ICACU.</li> </ul> <p>We are not having any issues with this currently. We have applied for all our looked after children who require settled status. Some have it and some we are still waiting for.</p> <p>In relation to the other issues</p>	<p>As in paragraph 16D above Legal Services to monitor any changes to the process for liaising between countries and Court jurisdictions.</p>
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			raised we have not had any where we have not received the information that we need.	
Medicine				

	<p>Drug and alcohol treatment services</p>	<p>Investigations suggest drug treatment meds tend to be produced in uk which means at least for that area might be a bit less risk (though we don't know obvs about overall supply chain/raw materials etc).</p> <ul style="list-style-type: none"> <li>- Medical supply chains are incredibly complex to map</li> <li>- Pharmacies are worried, but not panicking and we are working with NHS colleagues to look further at supply chains to get better assessment of risk.</li> <li>• Basic message from DHSC about moving people to alternatives not as easy for some treatments - won't just apply to drug treatment though.</li> <li>• Main worry methadone treatment – not easy to switch people to alternatives, with risk of relapse leading to overdose, poor health, crime etc.</li> <li>• As well as risk assessing the</li> </ul>	<p>SHSC Chief Pharmacist is working in partnership with other Chief Pharmacists in Sheffield and have a Memorandum of understanding (MOU) in place to support each other in the event of medicine supply issues.</p> <p>NHS England and NHS Improvement have issued a directive that NHS providers are not to stockpile medicines and have undertaken to do this centrally on our behalf.</p> <p>Monitoring is in place across Sheffield of medicine supply issues.</p> <p>SCC Drug/Alcohol Service Commissioning Lead sits on CCG led Pharmacy Transformation Group where relevant issues are discussed.</p>	
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		<p>impact of a shortage of medication, which would mean increased risks of disengagement in treatment, increase in demand on the illicit drug market in Sheffield and its associated risks, diversion of prescribed medication, overdoses and in the worst cases fatalities – all of these would place demand on blue light services as well as the obvious impacts on individuals and their families and our services ability to function.</p> <ul style="list-style-type: none"><li>• The majority of our opioid treatment population are on methadone, but we have significant minority on Buprenorphine which we have already experienced supply issues with, and which then drove up the cost of the non-generic brands that we don't usually use, but had to in the absence of generic brands – so price rather than supply could be another</li></ul>		
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		<p>potential risk. Potential concern in relation to supply of high dose injectable diamorphine.</p> <ul style="list-style-type: none"><li>• This isn't a council specific issue– not something we on our own can do something about – issues for whole of NHS, public health, Pharmacies etc so as SCC need to be linked to any wider planning locally and regionally and ensure we clearly seen as a stakeholder in this.</li><li>• Primary concern/risk comes for the Opiate service where the majority of the population are receiving pharmacological interventions and not having access to medication leaves a high risk of OD and relapse with opioids. Non-Opiates it's not an issue at the moment as we don't prescribe, and alcohol it's far from ideal (meds prescribed including community detox,</li></ul>		
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		<p>relapse prevention and nutritional prescribing) but more manageable. The risk to life if no medication is all in the Opiate service. Also bear in mind we have 5 beds on Burbage ward for inpatient detoxes, and they would be impacted too by lack of access to these and other meds.</p> <p>- The majority of our opioid treatment population are on methadone, but we have significant minority on Buprenorphine which we have already experienced supply issues with, and which then drove up the cost of the non-generic brands that we don't usually use, but had to in the absence of generic brands – so price rather than supply could be another potential risk</p> <p>- Legal basis for medical testing/authorisation disappears which will impact on pharmaceutical supply</p>		
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		<p>chains. Trade and tariffs on drugs and tech is likely to have major implications for NHS budget. Stockpiling is happening too (pharmaceutical companies have been asked to keep 6 weeks worth).</p>		
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<p><b>Adults (including residential and social care)</b></p>				
	<p>- Social care providers</p>		<p>Government (DHSC) have written to providers but it is unclear who they've actually written to - we're assuming that it must only be CQC registered providers as they are unlikely to know some of the smaller organisations. The letter has accompanying guidance and we haven't had any providers contact SCC on the back of the letter.</p> <p>- Worth noting all care providers are required by CQC to have a contingency plan in case of local resilience issues/challenges. Hard to see how Brexit implications on day 1/week 1, would not be covered by existing plans. The issues are likely to be further down the line (supplies, workforce etc.)</p> <p>- We have recently undertaken the fees consultation with providers and Brexit was flagged as a potential risk and cost driver (price</p>	

			of supplies, services etc.) by a number of those that responded.	
	EU nationals involved in service provision e.g. care workers/assistants.		Currently gathering information about our engagement with providers and feedback we have received / market intelligence we are acting on. Need to specifically understand whether providers are engaging with getting EU Nationals on the EU Settlement Scheme and ensure we are helping with that. Development of Workforce profile	

			for Sheffield that sets out how exposed we are to EU nationals.	
<b>Advice and Guidance</b>				
	Access to support services		Grant aid and other funding reviews re priorities	
	Risk of increased need for advice and support for residents regarding Brexit related issues		Strong communications and work with VCF and communities	
<b>Communications</b>				
	- Integrated with LRF and other stakeholders		SCC internal group structuring response/risk assessment of potential issues/concerns in line with LRF guidance and approach and focussing on internal readiness, local residents and businesses,	

			uniting your community and building resilience	
	- Messages to key stakeholders		<p>LGA held a "Communicating Brexit locally" workshop that identified 4 areas of concern for communications - internal readiness, local residents and businesses, uniting your community and building resilience.</p> <ul style="list-style-type: none"> <li>- 4 headings to be used within SCC comms activity to ensure co-ordinated approach across the council</li> <li>- Government stock answer appears to be to direct people, local authorities, businesses etc. to Gov.UK site and the content on here.</li> <li>- Point made at the workshop that surveys show 45% of people in the UK think that Brexit will affect them, but this means awareness raising is required as 'it will affect everyone'. Government relaying the message to be prepared but</li> </ul>	

			<p>difficult to prepare when we don't as yet know the final outcome i.e. PM's deal or no deal. Plan/Strategy</p>	
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			<p>SCC EU Exit Comms Plan aims to enable Sheffield City Council to communicate effectively in order to help protect the public/staff, or help them to protect themselves, and to reduce any disruption to their lives before, during or after a major or critical incident by:</p> <ul style="list-style-type: none"><li>• To be a trusted voice on the local impact of the EU exit</li><li>• Ensuring that mechanisms are in place to warn and inform the public/staff before, during and after a major or critical incident, and ensure the public feel well informed</li><li>• Avoiding alarming the public/staff unnecessarily and providing information so that people can decide for themselves how to deal with situations</li><li>• Ensure people in Sheffield receive relevant, timely, accurate, non-political information on the local impact of the EU exit</li><li>• To instill confidence in the strong and established partnership between key agencies</li></ul>	
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			<ul style="list-style-type: none"><li>• Achieving positive coverage of the work of staff supporting the emergency work</li><li>• Developing public confidence in the handling of the recovery from the incident</li><li>• Building goodwill among the media for help with publicity, or for restraint</li></ul>	
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<b>Information Sharing</b>				
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	<p>- Risk to access to information and systems</p>		<p>In the context of Information Sharing (GDPR)</p> <p>The Data Protection Act 2018 came into force in the UK at the same time as the GDPR took effect. It covers four data protection regimes:</p> <p>1.Part 2, Chapter 2: General processing – the GDPR – this chapter supplements the GDPR so that it operates in a UK context.</p> <p>2.Part 2, Chapter 3: Other general processing – this chapter applies a UK version of the GDPR (the “applied GDPR”) to those areas outside the scope of EU law, such as defence.</p> <p>3.Part 3: Law enforcement processing – this chapter brings into UK law the EU Data Protection Directive 2016/680 (the Law Enforcement Directive).</p> <p>- The ICO has produced a 6 step check list for UK businesses and organisations to follow in the event of a 'no deal' Brexit:</p> <p>1) Continue to comply and apply GDPR standards and follow current</p>	<ul style="list-style-type: none"> <li>• Ascertain data flows from EU to UK, most of which will be occurring via Sheffield City Council data processors</li> <li>• Ascertain data flows from UK to US in light of Schrems judgment and incorporate this into the work</li> <li>• Prioritise those according to level of risk</li> <li>• Seek assurance from relevant suppliers</li> </ul>
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			<p>ICO guidance</p> <p>2) Data transfers to the UK - review of data flows and where (if) SCC receives data from the EEA and safeguards that can be put in place to ensure that data can continue to flow once UK leaves the EU</p> <p>3) Data transfers from the UK - review data flows and identify where an organisation transfer data from the UK to any country outside of the UK, as these will fail under new UK transfer and documentation provisions.</p> <p>4) If an organisation operates across Europe, review the structure, processing operations and data flows to assess how the UK's exit from the EU will affect the data protection regimes that apply.</p> <p>5) Review privacy information and internal documentation to identify any details that will need updating when the UK leaves the EU</p> <p>6) Organisational awareness - key people aware of the issues and that these are factored in to 'no deal' Brexit planning</p>	
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Business and Employment Support				
	Job losses - supporting people	Covid is already seeing us expect job losses - mitigations against this and helping people will coincide with any potential impact on the job market from businesses seeing changes to how they operate.	Sheffield City Council, Citizens Advice Sheffield, Shelter, DWP and other partners are currently working together within our current resources to: Provide a set of self-help resources, housed on SCC website, for people experiencing redundancies including information Join up existing service provision by agreeing call handlers on both SCC helpline and Citizens Advice helpline use similar scripts and checklists for support Provide information about accessing employment and skills support and other support such as DWP's flexible support fund	
	Support for Business	Businesses not having the time to prepare in light of Covid. Preparations not considering the areas of impact for them and the changes which end of transition period could bring.	Staff are working to ensure the Covid recovery response interlinks with preparing for the end of transition perio. Talking to businesses about preparing and Business Sheffield are working closely with the SCR who are	

			coordinating their work through the Chambers of Commerce.	
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