

Cardiff Council's Preparedness for a No-Deal Brexit

Introduction

This report provides an overview of the identified issues in relation to a no-deal Brexit, alongside the actions which have taken place to mitigate their potential impact(s).

The issues contained within this report have been drawn from a variety of sources, including:

- A self-assessment which Cardiff Council completed in October 2018 related to Brexit preparedness
- WLGA, Welsh Government and UK Government issued guidance and support
- Welsh Government 'no-deal action plan'
- The Assessment of the Brexit Preparedness Toolkit prepared by Grant Thornton on behalf of the WLGA
- Cardiff Council's Corporate & Directorate Risk Registers
- Assurance statements provided by Cardiff Council Directorates
- Issues raised at the Cardiff Public Services Board (PSB) Brexit Response Group, a multi-agency response to Brexit
- Issues raised at the South Wales Local Resilience Forum (LRF)

Note: This report identifies and responds only to recognised sources and does not seek to respond to media speculation or leaked reports.

Citizens and Community Cohesion

Issue	Source	Mitigation	Responsibility	Is this recorded in the Corporate/ Directorate Risk Register?
EU Settlement Scheme (EUSS)				
<ul style="list-style-type: none"> • The predominant risk is in relation to the visibility and awareness of the scheme. • 4,000 applications were made to the EUSS by EU nationals living in Cardiff by 30 June 2019. • This is a relatively low application rate when considering the estimated number of EU nationals living in Cardiff (by Country of Birth): 20,000 – 25,000. A take-up rate of 16-20% is suggested. • If the UK leaves the EU with a deal, the deadline to apply will be 30 June 2021. Individuals will need to be living in the UK by 31 December 2020 to apply. If the UK leaves the EU without a deal, the deadline for applying will be 31 December 2020 and individuals will need to be living in the UK before it leaves the EU to apply. 	<p><i>The Home Office published the EUSS Statement of Intent in June 2018, alongside EUSS guidance for EU citizens¹. The Home Office provides monthly statistics on applications made to the EUSS². The Government announced their immigration plans for a no-deal Brexit in a statement on 4 September 2019³ and it is included within a 'No-deal immigration arrangements for EU citizens arriving after Brexit' policy paper⁴. The</i></p>	<ul style="list-style-type: none"> • The Council's website⁶ contains a section on the EU Settlement Scheme, providing guidance to EU/ EEA/ Swiss citizens and their families who live in Cardiff. A list of support services is given, for further advice and information, including digital application support. • In order to support EU citizens to complete the ID checking part of the EUSS process, Cardiff's Registrar Office is working to offer a 'chip and check' ID scanning service at City Hall. The service will be useful for anyone who is unable to upload their ID documents/ requires support to do so. Offering this service will come at a cost to the Council in terms of staff time and 	Cohesion and Community Engagement	Recorded in: <ul style="list-style-type: none"> • Corporate Risk Register

¹ Apply to the EU Settlement Scheme (settled and pre-settled status) <https://www.gov.uk/settled-status-eu-citizens-families>

² EU Settlement Scheme Statistics, June 2019 <https://www.gov.uk/government/statistics/eu-settlement-scheme-statistics-june-2019>

³ Government announces immigration plans for no-deal Brexit (September 2019) <https://www.gov.uk/government/news/government-announces-immigration-plans-for-no-deal-brexit>

⁴ No-deal immigration arrangements for EU citizens arriving after Brexit (September 2019) <https://www.gov.uk/government/publications/no-deal-immigration-arrangements-for-eu-citizens-moving-to-the-uk-after-brexit/no-deal-immigration-arrangements-for-eu-citizens-arriving-after-brexit>

⁶ Cardiff Council Website: EU Settlement Scheme <https://www.cardiff.gov.uk/ENG/resident/EU-settlement-scheme/Pages/default.aspx>

<ul style="list-style-type: none"> The question remains as to what happens to those who haven't applied to the scheme by the deadline. This raises issues in terms of eligibility for public services/ no recourse to public funds. 	<p><i>issue was raised within the Welsh Government's assessment of the impact of a no-deal Brexit⁵.</i></p>	<p>equipment. Representations are being made to the WG through the WLGA in relation to funding to cover these costs.</p> <ul style="list-style-type: none"> The Council has developed a Cardiff Community Engagement Action Plan (2019-2020) to support co-ordination of the EUSS locally, which reflects the recommended actions contained within UK Government guidance. The Council has also completed a self-assessment of local preparedness in terms of the EUSS and tension-monitoring processes in line with UK Government guidance. The Council has printed materials in order to increase the visibility of the scheme. These are being distributed in strategic venues across Cardiff. The EUSS and local support is also being promoted through social media channels with a high percentage of Cardiff-based EU national followers. The Council is hosting three engagement events to promote the EUSS and available support to EU nationals living in Cardiff, with targeted engagement for vulnerable groups. One event is being held each 		
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⁵ Welsh Government: Preparing for a No Deal Brexit https://gov.wales/sites/default/files/publications/2019-09/preparing-for-a-no-deal-brexite_0.pdf

		<p>month, from August to October 2019, in different Hubs across the city.</p> <ul style="list-style-type: none"> • In September 2019, the Council ran a review session (with various external support services) to look at targeted activity for a variety of groups at risk of not applying. Newport Mind, for example, will be leading on outreach for older people in Cardiff. • The EUSS will be promoted further during employer/ business 'Brexit' focused events in September/ October 2019. • Furthermore, the Council is in the initial stages of developing EUSS engagement events with schools in Cardiff. 		
Impact on Local Communities				
<p><i>Racism and Race-Related Hate Crime</i></p> <ul style="list-style-type: none"> • Concern remains among local authorities, public service providers and third sector organisations regarding the impact of Brexit on local communities (such as the potential for increases of tension/ hate crime), particularly amidst the additional uncertainty of no-deal Brexit • Racism and race-related hate crime has increased since the 2016 Brexit referendum, with three of the four Welsh 	<p><i>Racism and race-related hate crime is monitored by the UK Government. The Home Office publish statistics on hate crimes recorded by the police and information on hate crime from the Crime Survey for England and Wales⁷, which highlights that racism and race-</i></p>	<ul style="list-style-type: none"> • No significant Brexit-related tensions have been identified in Cardiff to date and there are no observable changes to levels of hate crime in the city, which remain consistent. • Daily monitoring continues via the Council's community safety / community cohesion/ counter-extremism/ Prevent networks, alongside through the use of open source data and local media. 	<p>Cohesion and Community Engagement/ South Wales Police</p>	<p>Recorded in:</p> <ul style="list-style-type: none"> • Corporate Risk Register

⁷ Hate crime, England and Wales, 2017 to 2018 <https://www.gov.uk/government/statistics/hate-crime-england-and-wales-2017-to-2018>

<p>police forces reporting rises in the last five years.</p> <ul style="list-style-type: none"> • Following a Freedom of Information request, South Wales Police said there were 879 incidents in 2013-14, rising to 1,102 in 2014-15, 1,232 in 2015-16 and 1,244 in 2017-18. 	<p><i>related hate crime has increased since the 2016 Brexit referendum. The issue was raised within the Welsh Government’s assessment of the impact of a no-deal Brexit⁵.</i></p>	<ul style="list-style-type: none"> • The Council continues to provide intelligence regarding community tensions to the Police via the weekly tension monitoring protocol, through which updates are submitted to the South Wales Police Community Safety Inspector via email every Monday. • As noted above, the Council has completed a self-assessment of local preparedness in terms of the EU Settlement Scheme which is in line with UK Government guidance and considers the tension-monitoring process. • Cardiff Council has been successful in requesting communications support from distinguished international advertising agency M&C Saatchi, to develop a regional communication campaign drawing upon Welsh identity and the region’s shared migration and industrial history. The Welsh Government will be involved in the design of the campaign and are in positive dialogue with the Council regarding financing the visibility of the campaign in the region with the EU Transition Funds ring-fenced for hate crime related communications. 		
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Council Service Delivery

Issue	Source	Mitigation	Responsibility	Is this recorded in the Corporate/ Directorate Risk Register?
Social Services				
<p><i>Workforce</i></p> <ul style="list-style-type: none"> • A number of uncertainties resulting from Brexit may impact on the Social Care sector's ability to meet its primary responsibilities. • There is a risk that Brexit will create a less favourable environment for EU nationals (alongside workers from non-EU countries), with a potential for shortfalls and increased turnover in the Social Care workforce, exacerbating recruitment and retention difficulties. • This is within the context of rising demand and the need to expand the social care workforce in the future. • The exact numbers of EU nationals employed in the Cardiff social care workforce is unknown. However, national statistics indicate it is around 4% in the domiciliary care sector, 8% in the residential nursing sector, 4% in residential child care and 4.5% in child minding, with 	<p><i>The Welsh Government commissioned a survey of registered social care and childcare providers to understand the potential impact of Brexit⁸. The issue was raised within the Welsh Government's assessment of the impact of a no-deal Brexit⁵.</i></p>	<ul style="list-style-type: none"> • Work has been undertaken within Social Services to engage with internal teams and sector providers to ensure clear lines of communication exist. • Providers and internal Social Services staff continue to be signposted to relevant support websites. • The Council continues to engage with Social Care Wales' National recruitment campaign. • The regional "Be a Care Worker" recruitment campaign has been relaunched. • Data collection arrangements have been strengthened in order to inform workforce planning, including undertaking work to determine the skill mix within the internal workforce. 	Social Services	<p>Recorded in:</p> <ul style="list-style-type: none"> • Social Services Directorate Risk Register • Social Services Brexit Assurance Statement

⁸ Welsh Government: Implications of Brexit on social care and childcare workforce <https://gov.wales/sites/default/files/statistics-and-research/2019-03/implications-brexit-social-care-and-childcare-workforce.pdf>

<p>around 6.4% for the whole social care workforce.</p>		<ul style="list-style-type: none"> • Links have been created with HR in order to determine the number of EU nationals that are employed in the service area. This will increase understanding of the impact of Brexit on the internal workforce (and appropriate action can therefore be taken). 		
<p><i>EU Settlement Scheme</i></p> <ul style="list-style-type: none"> • Local Authorities have a duty to ensure that applications are made on behalf of all looked after children (for whom they have parental responsibility and who are EU citizens). • There is also a wider concern that those who are eligible for the EUSS may miss the opportunity to achieve ‘settlement’ status. • Historically, data around nationality has not been collected/ been made a mandatory field on the Council’s case management system. It is therefore difficult to estimate the quantum of work that will be needed to support eligible individuals who have care and support needs through the EUSS, until this data is captured. 	<p><i>The Home Office published the EUSS Statement of Intent in June 2018, alongside EUSS guidance for EU citizens⁹. The Home Office provides monthly statistics on applications made to the EUSS¹⁰.</i></p>	<ul style="list-style-type: none"> • As Local Authorities have a duty to ensure that applications are made on behalf of all looked after children (for whom they have parental responsibility and who are EU citizens), records will be kept of each application made in order to ensure individuals are tracked through the scheme. Eligible individuals, their legal status and where they are in the process of accessing the scheme is recorded. This is in line with Home Office/ Welsh Government guidance and is supported by administrative staff. • The same exercise is to be undertaken for relevant adults within care. 	<p>Social Services</p>	<p>Recorded in:</p> <ul style="list-style-type: none"> • Social Services Directorate Risk Register • Social Services Brexit Assurance Statement

⁹ Home Office: Apply to the EU Settlement Scheme (settled and pre-settled status) <https://www.gov.uk/settled-status-eu-citizens-families>

¹⁰ Home Office: EU Settlement Scheme Statistics, June 2019 <https://www.gov.uk/government/statistics/eu-settlement-scheme-statistics-june-2019>

<ul style="list-style-type: none"> • Care Home providers continue to be concerned about their responsibilities regarding support to vulnerable self-funders in their care who are eligible to go through the EUSS. Social Services are not currently aware of any specific advice or clarity that has been issued by the Home Office in relation to liability regarding these responsibilities, should providers fail to identify an eligible individual who required support to be taken through the scheme. Advice/ clarity has been requested by Care Forum Wales. • Commissioned Social Care providers are unlikely to be prioritising supporting staff (and vulnerable self-funders in care homes) through the EUSS at this time, given the pressures they are currently facing regarding RISCA registration. 		<ul style="list-style-type: none"> • Providers and internal staff are being signposted to support available – both online and in Cardiff’s Hubs. • The EUSS has become a standing agenda item at Provider Forums. • Nationality has been made a mandatory field on CareFirst. The only gaps that remain are therefore historical and are being systematically addressed in both Adults and Children’s Services with the oversight of appropriate Operational Managers. • Social Services are working to identify those individuals who receive care and who are eligible for the scheme, to ensure that they receive the appropriate support (via their social workers/ support workers) to access the scheme. 		
<p><i>Increased Demand on Services</i></p> <ul style="list-style-type: none"> • Whilst demand for social care is likely to rise as the population ages and people live for longer (with a range of health conditions and disabilities), poverty also has a direct impact on family life. Child 	<p><i>Social Care Wales’ Chief Executive produced an article on their website, ‘Brexit – what might it mean for social care in Wales?’ in January 2019¹¹ which outlined the issue.</i></p>	<ul style="list-style-type: none"> • Social Services are continuing to monitor Welsh Government issued guidance and support, alongside updates from Central Government. 	<p>Social Services</p>	<p>Risk to be recorded in Social Services Directorate Risk Register Update</p>

¹¹ Social Care Wales: Brexit – what might it mean for social care in Wales? (January 2019) <https://socialcare.wales/news-stories/brexit-what-might-it-mean-for-social-care-in-wales>

<p>protection referrals, for example, tend to increase when families are under increased economic pressure; something which may result from a no-deal Brexit.</p> <ul style="list-style-type: none"> • Furthermore, whilst it is difficult to determine how many UK nationals live in the EU (and if they will return), there is a potential for an increase in demand for social care as a result of UK citizens returning from the EU. A 'worst-case' assessment is currently being reviewed by Welsh Government. 	<p><i>The concern regarding UK returners from the EU was raised in a Welsh Government letter to the WLGA. The issue was raised within the Welsh Government's assessment of the impact of a no-deal Brexit⁵.</i></p>	<ul style="list-style-type: none"> • Calls will be undertaken by Welsh Government with Social Care leads prior to Brexit, which will create accurate and timely situation awareness. If there is a spike in demand for Social Care, the Council has been asked to get in touch with Welsh Government in terms of seeking support. 		
<p><i>Economic Sustainability of Providers</i></p> <ul style="list-style-type: none"> • The majority of Cardiff's Social Care providers are small to medium-sized enterprises (SMEs). The risk of potential economic shocks (such as a recession) as a result of Brexit could reduce the opportunities of these businesses to borrow, alongside the value of their investments (for example, care homes), affecting their financial sustainability. • The Social Care market is already fragile due to declining financial viability of providers. A potential increase in inflation following EU exit would significantly impact Social Care providers due to increasing staff and supply costs, and may lead to a provider failure. 	<p><i>The issue was outlined within the UK Government's 'Operation Yellowhammer: HMG Reasonable Worst Case Planning Assumptions' document¹². The issue was raised within the Welsh Government's assessment of the impact of a no-deal Brexit⁵.</i></p>	<ul style="list-style-type: none"> • Social Services are keeping fee level payments under review and are working to have a robust fee setting strategy in place, which reflects the usual cost of care in the Local Authority. • In terms of provider failure, business continuity plans are already in place that seek to address provider failure. Social Services work to ensure that these are kept updated and that the local market is able to respond in such situations, in order to certify that people in need of care and support can continue to receive it. • Considering the role that in-house services play (and rebalancing the 	Social Services	Risk to be recorded in Social Services Directorate Risk Register Update

¹² Operation Yellowhammer: HMG Reasonable Worst Case Planning Assumptions (August 2019)

https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/831199/20190802_Latest_Yellowhammer_Planning_assumptions_CDL.pdf

		proportion of in-house and external provision) may also help the Council to remain in control, should provider failure be experienced.		
<p><i>Shortage/ Loss of Key Supplies</i></p> <ul style="list-style-type: none"> One potential consequence of the potential disruption to imports, as a result of a no-deal Brexit, is the continuity of supplies to the delivery of health and social care in Wales. Medical devices and clinical consumables (MDCCs) may be impacted by potential changes to trading relations with the EU, alongside food supplies (affecting, for example, care homes and elderly who rely on ‘meals on wheels.’) This is amidst warehousing and stockpiling capacity being limited in the pre-Christmas period. 	<p><i>If the UK leaves the EU without a Withdrawal Agreement, the EU will treat the UK as a third country for trade in goods and services. The UK Government has considered the consequences of this and how supplies might be influenced/ disrupted¹³. The issue was outlined within the UK Government’s ‘Operation Yellowhammer: HMG Reasonable Worst Case Planning Assumptions’ document¹². The issue was raised within the Welsh Government’s assessment of the impact of a no-deal Brexit⁵.</i></p>	<ul style="list-style-type: none"> Prior to the UK’s initial departure date from the EU (29 March 2019), an audit took place of the stock held in the Cardiff & Vale NHS Trust Joint Equipment Store. A Local Authority survey was also completed in relation to MDCC spend. Distribution providers (of MDCCs) utilised by Cardiff’s Social Care Services were identified and contact made with suppliers to confirm the measures being taken to mitigate disruption risks. Engagement furthermore took place with commissioned providers of Social Care Services and feedback was obtained regarding their stocks held and distribution suppliers utilised. Communication was sent out to providers to reinforce Central Government’s position in respect 	Social Services	<p>Recorded in:</p> <ul style="list-style-type: none"> Social Services Directorate Risk Register Social Services Brexit Assurance Statement

¹³ Implications for Business and Trade of a No-Deal Exit on 29 March 2019 (February 2019)

https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/781768/Implications_for_Business_and_Trade_of_a_No_Deal_Exit_on_29_March_2019.pdf

		<p>of not stockpiling but retaining 'business as usual' stock levels, alongside ensuring that providers and internal services consider Brexit-related risks as part of their Business Continuity Plans.</p> <ul style="list-style-type: none"> • This led to the Social Services Directorate providing an assurance statement regarding readiness for a Brexit 'no-deal' scenario, of which Emergency Management were satisfied all reasonable planning assumptions were covered. • This work has been refreshed in light of the new (31 October 2019) exit date. • During a Domiciliary Care Provider Forum held in July 2019, providers assured officers that their business as usual stocks of MDCCs are high but they are not stockpiling. • The Council has worked with Welsh Government to confirm arrangements for the coordination and storage of emergency MDCCs, should the Council need to access these from the national distribution centre if local stocks fall below a safe level. 		
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		Cardiff-based temporary storage arrangements have been agreed in accordance with the Joint Equipment Store, alongside plans for coordination and distribution of emergency supplies, should this be needed.		
Education				
<p><i>Workforce</i></p> <ul style="list-style-type: none"> The scale of EU nationals in the school workforce is currently unknown, although can be estimated as being 5-9%. There is a risk that Brexit will create a less favourable environment for EU nationals, with a potential for shortfalls/ increased turnover in the school workforce. 	<p><i>The issue was raised within the Welsh Government's assessment of the impact of a no-deal Brexit⁵.</i></p>	<ul style="list-style-type: none"> Education are currently considering mitigative actions in accordance with HR. 	Education	No risks recorded
<p><i>Increased Demand for Services</i></p> <ul style="list-style-type: none"> Whilst it is difficult to determine how many UK nationals live in the EU (and if they will return), there is a potential for an increase in demand for education as a result of UK citizens returning from the EU. 	<p><i>The concern regarding UK returners from the EU was raised in a Welsh Government letter to the WLGA. The issue was raised within the Welsh Government's assessment of the impact of a no-deal Brexit⁵.</i></p>	<ul style="list-style-type: none"> Education are currently considering potential mitigative actions. 	Education	No risks recorded
<p><i>Shortage/ Loss of Key Supplies</i></p> <ul style="list-style-type: none"> The predominant risk is in relation to the continuity of fresh food for pupils' meals, alongside the potential increase in food prices. 	<p><i>If the UK leaves the EU without a Withdrawal Agreement, the EU will treat the UK as a third country for trade in goods and services. The UK</i></p>	<ul style="list-style-type: none"> In February 2019, in line with the initial (29 March 2019) exit date, the Education Directorate considered supply chain disruption within their normal 	Education	Recorded in: <ul style="list-style-type: none"> Education Brexit Assurance Statement

<ul style="list-style-type: none"> • There is also a potential for disruption to medical supplies for children in school. 	<p><i>Government has considered the consequences of this and how supplies might be influenced/ disrupted¹³. The issue was outlined within the UK Government's 'Operation Yellowhammer: HMG Reasonable Worst Case Planning Assumptions' document¹². The issue was raised within the Welsh Government's assessment of the impact of a no-deal Brexit⁵.</i></p>	<p>business continuity planning and procedures.</p> <ul style="list-style-type: none"> • This led to the Directorate providing an assurance statement regarding readiness for a Brexit 'no-deal' scenario – for example, that supplies will be maintained via frozen products where fresh may become scarce. The situation is monitored weekly by the Council's main supplier, who has increased stock to a level that they feel will allow continued supply in the event of supply issues. • Emergency Management were satisfied the Directorate has engaged with key suppliers and prepared adequately for no-deal Brexit based on reasonable planning assumptions. • This work has been refreshed in light of the new (31 October 2019) exit date. • Additionally, prior to the initial, March 2019 exit date, the Council completed a detailed survey in which was sent to all local authority catering managers by Welsh Government, to establish a comprehensive picture of local 		
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		authority and school readiness in the case of a no deal Brexit. The survey has been updated in order to align with the October 2019 exit date.		
<p><i>Erasmus+ and European Solidarity Corps (ESC) Funding</i></p> <ul style="list-style-type: none"> The UK Government has a guarantee which covers funding for successful Erasmus+ (the European Union programme for education, training, youth and sport) and ESC bids, if the UK leaves the EU without a deal. However, Leaving the EU without a Withdrawal Agreement being in place, and without the UK Government reaching an alternative Third Country agreement or other arrangement, will result in universities, colleges and schools across the UK being ineligible to <i>submit</i> applications to participate in the final year of the current Erasmus+ programme in 2020. The preferred position is for the UK Government to secure continued participate in Erasmus+. However, the UK's participation post-exist is uncertain and negotiations cannot start until after the UK leaves the EU. 	<p><i>Concerns have been outlined in an August 2019 letter from Kirsty Williams AC/AM (Minister for Education) and Richard Lochhead MSP (Minister for Further Education, Higher Education and Science) to Gavin Williamson CBE MP (Secretary of State for Education)¹⁴. The Erasmus+ website continues to publish updates¹⁵. The issue was raised within the Welsh Government's assessment of the impact of a no-deal Brexit⁵.</i></p>	<ul style="list-style-type: none"> It is currently unclear as to whether the UK Government will secure continued participation in Erasmus+. Furthermore, the UK's financial contribution to the Erasmus programme is held by the UK Government. It is therefore UK Government responsibility for delivery of alternative domestic arrangements to replace provision post-Brexit. The UK Government has not yet announced alternative domestic UK arrangements. Cardiff Council's Education Directorate continues to monitor the situation. 	Education	<p>Recorded in:</p> <ul style="list-style-type: none"> Education Brexit Assurance Statement

¹⁴ Joint Letter to Secretary of State for Education from Kirsty Williams and Richard Lochhead (August 2019) <https://cdn.prgloo.com/media/download/8c8a1f2d63c94fbd80d97b5bf75c1d49>

¹⁵ Erasmus+ Brexit Updates <https://www.erasmusplus.org.uk/brexit-update>

<ul style="list-style-type: none"> Furthermore, the UK Government guarantee is only for Erasmus+ partners in the UK. Cardiff Council coordinates multiple projects with multiple partners, whose funding is not guaranteed. Cardiff Council has been awarded €1,269,000 for 2019 KA2 partnership projects. The first 40% will likely be received before the end of October 2019 but without a deal, and without the EU agreeing to pick up the rest of the funding, it is unlikely these projects will complete. 				
Planning, Transport and Environment				
<p><i>Shortage/ Loss of Key Supplies</i></p> <ul style="list-style-type: none"> The predominant risk is in relation to disruption to service contracts, alongside an inability or delay in getting supplies, parts and equipment, which may be equally met with increased supplier/ import costs. 	<p><i>If the UK leaves the EU without a Withdrawal Agreement, the EU will treat the UK as a third country for trade in goods and services. The UK Government has considered the consequences of this and how supplies might be influenced/ disrupted¹³. The issue was outlined within the UK Government's 'Operation Yellowhammer: HMG Reasonable Worst Case Planning Assumptions' document¹². The issue was raised within the</i></p>	<ul style="list-style-type: none"> In February 2019, in line with the initial (29 March 2019) exit date, the Planning, Transport and Environment Directorate considered supply chain disruption within their normal business continuity planning and procedures. Assurance was sought from identified suppliers/ service providers where there was any potential risk and mitigation actioned where necessary (by sourcing alternative suppliers/ stockpiling; for example, waste bags). 	<p>Planning, Transport and Environment</p>	<p>Recorded in:</p> <ul style="list-style-type: none"> Planning, Transport and Environment Directorate Risk Register Planning, Transport and Environment Brexit Assurance Statement

	<p><i>Welsh Government's assessment of the impact of a no-deal Brexit⁵.</i></p>	<ul style="list-style-type: none"> • This led to the Directorate providing an assurance statement regarding readiness for a Brexit 'no-deal' scenario. • Emergency Management were satisfied the Directorate has engaged with key suppliers and prepared adequately for no-deal Brexit based on reasonable planning assumptions. • This work has been refreshed in light of the new (31 October 2019) exit date. 		
Economic Development				
<p><i>Shortage/ Loss of Key Supplies</i></p> <ul style="list-style-type: none"> • The predominant risk is in relation to disruption to supplies which are required for building support, including the operation of service contracts. 	<p><i>If the UK leaves the EU without a Withdrawal Agreement, the EU will treat the UK as a third country for trade in goods and services. The UK Government has considered the consequences of this and how supplies might be influenced/ disrupted¹³. The issue was outlined within the UK Government's 'Operation Yellowhammer: HMG Reasonable Worst Case</i></p>	<ul style="list-style-type: none"> • In February 2019, in line with the initial (29 March 2019) exit date, the Economic Development Directorate considered supply chain disruption within their normal business continuity planning and procedures. • Assurance was sought from identified suppliers/ service providers where there was any potential risk and mitigation actioned where necessary (by utilising alternative suppliers/service provider and/or increasing stock levels). 	Economic Development	<p>Risks recorded in:</p> <ul style="list-style-type: none"> • Economic Development Brexit Assurance Statement

	<i>Planning Assumptions' document¹².</i>	<ul style="list-style-type: none"> This led to the Directorate providing an assurance statement regarding readiness for a Brexit 'no-deal' scenario. Emergency Management were satisfied the Directorate has engaged with key suppliers and prepared adequately for no-deal Brexit based on reasonable planning assumptions. This work has been refreshed in light of the new (31 October 2019) exit date. 		
Housing and Communities				
<p><i>Homelessness</i></p> <ul style="list-style-type: none"> The key concern is the potential for an increase in homelessness (due to rent arrears given the predicted economic downturn post-Brexit) and an inability to increase capacity in the Council's services. Individuals may not seek help until it is too late and this can result in an increase in rough sleeping, particularly among single men and those with complex needs. In addition to this, it is possible that many people may return from the EU. Although EU countries have put emergency measures in place to ensure that the UK 	<p><i>The issue was raised in a Welsh Government letter to the WLGA. The UK Government has produced a policy paper on citizens' rights in the event of a no-deal Brexit¹⁶</i></p> <p><i>The issue, in terms of increasing demand, was raised within the Welsh Government's assessment of the impact of a no-deal Brexit⁵.</i></p>	<ul style="list-style-type: none"> The Housing and Communities Directorate are monitoring the potential impact, alongside issued guidance and support. Cardiff Council, working through the WLGA, led on the awarding of a £250,000 bid to the Welsh Government for funding from the EU Transition Fund to establish a Migration Impact and Response Challenge Fund for Wales. The funding will be focused specifically on migrant homelessness, in order to manage recent and future 	Housing and Communities	<p>Recorded in:</p> <ul style="list-style-type: none"> Housing and Communities Brexit Assurance Statement

¹⁶ Citizens' Rights – EU citizens in the UK and UK nationals in the EU

https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/790570/Policy_Paper_on_citizens_rights_in_the_event_of_a_no_deal_Brexit.pdf

<p>nationals and their non-EU family members can remain legally resident in the immediate period after a no-deal withdrawal, people may start to return to the UK ahead of this. In order to claim local authority housing and welfare benefits, most applicants must pass a habitual residence test.</p> <ul style="list-style-type: none"> Any increase in homelessness may put pressure on services (for example: homeless assessment, prevention, supported accommodation, Temporary Accommodation and Hostels). Even with additional funding, it would be challenging for services to meet such an increase in demand. The Council will support vulnerable tenants, although increased rent arrears could put additional financial pressures on the Housing Revenue Account. 		<p>changes brought about in local areas in migration. The funding is being distributed among four local authorities and two charities in Wales, with Cardiff Council receiving £100,000 over a 6 month period (October 2019 – March 2020). The funding will aid the promotion of the EUSS among homeless migrants, which includes providing advice and support or referral to sources of support as appropriate.</p> <ul style="list-style-type: none"> Further mitigative actions are currently being reviewed/ considered by the Housing and Communities Directorate. 		
<p><i>Current Pressures and Risks Associated to New Builds</i></p> <ul style="list-style-type: none"> There is a risk in terms of the implications of Brexit on the Council's ability to achieve its housing delivery targets, and to manage/ maintain council stock. This is due to the potential slow-down in the housing market, increased build costs due to inflation, labour shortage in the 	<p><i>The impact of a no-deal Brexit scenario on the Housing Market was considered within the Office for Budget Responsibility's (OBR) July 2019 Fiscal Risks Report¹⁷.</i></p>	<ul style="list-style-type: none"> The current pressures and risks associated to new builds are continuing to be monitored by the Housing and Communities Directorate. 	Housing and Communities	<p>Recorded in:</p> <ul style="list-style-type: none"> Housing and Communities Brexit Assurance Statement

¹⁷ OBR: Fiscal risks report (July 2019) <https://www.bankofengland.co.uk/-/media/boe/files/report/2018/eu-withdrawal-scenarios-and-monetary-and-financial-stability.pdf?la=en&hash=B5F6EDCDF90DCC10286FC0BC599D94CAB8735DFB>

<p>construction industry and a negative impact on the Housing Revenue Account.</p> <ul style="list-style-type: none"> • Capacity within the building sector, particularly in Cardiff, is already stretched. • Given the nature of the Social Housing Sector, contractors (to some extent) are able to be selective on the projects that they bid for. • There is uncertainty and risks associated with Brexit and, as such, there has already been an increase in the price for some materials, affecting not only new builds but repairs, voids and disabled facilities grants. • Most contractors are planning for Brexit. However, due to unknown factors, new contract clauses are being proposed by some developers removing the risk from themselves for delays or increased costs associated with Brexit (especially with currency fluctuations). 				
<p><i>Provision of Advice</i></p> <ul style="list-style-type: none"> • The predominant risk is in relation to an increase in demand for advice services – namely in terms of the EU Settlement Scheme. The Council’s Hubs and Outreach Services are currently providing support/ advice to individuals applying for EU Settled Status. 	<p><i>The Home Office published the EUSS Statement of Intent in June 2018, alongside EUSS guidance for EU citizens¹⁸. The issue, in terms of increasing demand, was raised within the Welsh Government’s assessment</i></p>	<ul style="list-style-type: none"> • The wider demands on the service could be increased quickly if additional funding is made available due to the robust infrastructure of the Hubs and Outreach Services. 	<p>Housing and Communities</p>	<p>Recorded in:</p> <ul style="list-style-type: none"> • Housing and Communities Brexit Assurance Statement

¹⁸ Home Office: Apply to the EU Settlement Scheme (settled and pre-settled status) <https://www.gov.uk/settled-status-eu-citizens-families>

	<i>of the impact of a no-deal Brexit⁵.</i>			
<p><i>Shortage/ Loss of Key Supplies</i></p> <ul style="list-style-type: none"> The predominant risk is in relation to disruption to supplies/ shipments from the EU into the Joint Equipment Service. 	<p><i>If the UK leaves the EU without a Withdrawal Agreement, the EU will treat the UK as a third country for trade in goods and services. The UK Government has considered the consequences of this and how supplies might be influenced/ disrupted¹³. The issue was outlined within the UK Government's 'Operation Yellowhammer: HMG Reasonable Worst Case Planning Assumptions' document¹².</i></p>	<ul style="list-style-type: none"> In February 2019, in line with the initial (29 March 2019) exit date, the Housing and Communities Directorate considered supply chain disruption within their normal business continuity planning and procedures. Assurance was sought from identified suppliers where there was any potential risk and mitigation actioned where necessary (for example, ensuring that stocks of essential products are at a high level/ creating links to access backup national stockpiles if required). This led to the Directorate providing an assurance statement regarding readiness for a Brexit 'no-deal' scenario. Emergency Management were satisfied the Directorate has engaged with key suppliers and prepared adequately for no-deal Brexit based on reasonable planning assumptions. This work has been refreshed in light of the new (31 October 2019) exit date. 	Housing and Communities	<p>Recorded in:</p> <ul style="list-style-type: none"> Housing and Communities Brexit Assurance Statement

<p><i>Food Poverty:</i></p> <ul style="list-style-type: none"> Tackling food poverty in a no deal Brexit has been identified by Welsh Government as a key risk and priority area. The First Minister has agreed and announced funding of £2m from the EU Transition fund to help tackle food poverty and address food insecurity in a 'no deal' or 'deal' scenario. 	<p><i>The issue was raised within the Welsh Government's assessment of the impact of a no-deal Brexit⁵.</i></p>	<ul style="list-style-type: none"> A Cardiff Council proposal has been developed and submitted to the WLGA that seeks to both strengthen existing provision in relation to food poverty and fill identified gaps in provision. 		
Corporate Issues (Resources)				
<p><i>Finance</i></p> <ul style="list-style-type: none"> A no-deal Brexit could result in a reduction of public finances and a continuation of public service austerity A no-deal Brexit could result in a reduction in Council income (from fees and charges), reduction in grant funding and increase in costs (e.g. due to market changes/ import taxes). These impacts also extend to Council providers/ partners. 	<p><i>This issue is noted in Cardiff Council's Budget Strategy Report 2019/ 20 and Medium Term Plan¹⁹. It is also noted within an August 2019 Officer Decision Report regarding long-term borrowing. The issue was raised within the Welsh Government's assessment of the impact of a no-deal Brexit⁵.</i></p>	<ul style="list-style-type: none"> Work has been undertaken within Planning, Transport and Environment to consider potential reduction in income, alongside prospective increases in costs. Central finance are working with Planning, Transport and Environment to forecast, manage and mitigate any shortfall in income or increased costs, with monitoring ongoing. Financial uncertainty is resulting in a 'dip' in the cost of borrowing. The Council is therefore monitoring the cost of borrowing and taking advantage of any significant reduction in interest rates as a result of current Brexit uncertainty (and geo political 	Corporate Issue	<p>Recorded in:</p> <ul style="list-style-type: none"> Planning, Transport and Environment Directorate Risk Register Finance Brexit Assurance Statement

¹⁹ Cardiff Council's Budget Strategy Report 2019/20 and Medium Term Plan <http://cardiff.moderngov.co.uk/documents/s23060/Cabinet%2012%20July%202018%20Budget%20Strategy.pdf>

		<p>events). £10 million has been acquired and the position will continue to be monitored for further opportunities.</p> <ul style="list-style-type: none"> • Medium Term Planning has been strengthened. The uncertainty of Brexit has meant the need for additional sensitivity models to be run. Given the lack of certainty as to whether UK Government will (or won't) assist, financial resilience scenarios are of paramount importance. • The potential impact of any inflationary increases in food prices on budgets is being monitored by Welsh Government. 		
<p><i>Cardiff Council's Capital Projects</i></p> <ul style="list-style-type: none"> • An increase in the cost of imported goods due to a change to the tariff regime has the potential to impose inflationary pressure on Council capital projects. • Any restrictions on the free movement of labour could also potentially create inflationary wage pressures because of tightening labour market, competing wages up. 	<p><i>This is an issue raised by the Resources Directorate and is considered in 'The Potential Implications of a "No-Deal" Brexit for Cardiff Council' Cabinet Report (October 2018)²⁰</i></p>	<ul style="list-style-type: none"> • The Council has two procurement frameworks in relation to construction: SEWSCAP3 (school and public buildings procurement) and SWEH (civil engineering and highways construction procurement). The frameworks ensure protection from the introduction of potential 'Brexit clauses' by contractors (i.e. clauses which remove the risk from contractors in terms of 	<p>Finance</p>	<p>No risks recorded</p>

²⁰ The Potential Implications of a "No-Deal" Brexit for Cardiff Council <http://cardiff.moderngov.co.uk/documents/s24633/Cabinet%2011%20October%202018%20Brexit%20No%20Deal%20App%20A.pdf>

<ul style="list-style-type: none"> • The viability of certain projects may be impacted because of a deteriorating economic outlook, particularly if any of the projects are reliant on inward investment (as this may lead to a short-term reduction in investor confidence or market conditions). • There is also a potential impact on raw material and other input costs for capital schemes, as well as the known labour market pressures within some sectors. • Furthermore, due to unknown factors, new contract clauses are being proposed, removing the risk from contractors for delays or increased costs associated with Brexit (especially with currency fluctuations). 		<p>delays or increased costs associated with Brexit). The way in which the frameworks operate means that staffing costs/overheads can be monitored for change.</p> <ul style="list-style-type: none"> • The Council continues to monitor potential impacts. 		
<p><i>Insurance</i></p> <ul style="list-style-type: none"> • The predominant issue arises as a result of registrations. Not all individual insurance companies are registered with the Financial Conduct Authority (FCA). • Where these businesses are not registered with the FCA, there may be an issue with payment of claims/ liabilities after Brexit. 	<p><i>The issue was highlighted at a 2019 CIPFA hosted event. The issue was raised within the Welsh Government's assessment of the impact of a no-deal Brexit⁵.</i></p>	<ul style="list-style-type: none"> • As part of due diligence, the Council has undertaken an analysis of current claims over its excess to establish where these companies are registered and to identify their position for the 31 October 2019 exit date. • The analysis has resulted in an understanding that most companies are working towards FCA registration. However, the dates for these are not known. • The Council has also undertaken an analysis of all current insurers and this, at an early stage, has 	Finance	<p>Recorded in:</p> <ul style="list-style-type: none"> • Finance Brexit Assurance Statement

		<p>flagged up some issues. In order to continue businesses, some companies have identified that they are moving to Dublin. It is unsure whether registrations in Dublin will fall in line with the FCA.</p> <ul style="list-style-type: none"> • Discussion are ongoing about a ‘passporting arrangement’ which will provide temporary permission to continue business relationship between insurers and UK organisations. However, this currently contains the caveat “if they (the insurers) wish to continue.” • The analyses are also being considered from a legal viewpoint. 		
<p><i>Cardiff Council Staff</i></p> <ul style="list-style-type: none"> • There is no data immediately available on the number of non-UK EU workers within the Council, or working in areas directly commissioned by the Council. • There is a potential risk that Council employees from the EU will not be compliant with right to work checks in coming years. 	<p><i>The Home Office has published guidance on the EUSS for employers²¹ and employees/ EU citizens²². Additionally, guidance has been published regarding employing EU, EEA and Swiss citizens and their family members after Brexit²³.</i></p>	<ul style="list-style-type: none"> • Two emails have been sent to staff (one in March 2019 and subsequently one in September 2019), regarding the EU Settled Scheme and signposting to the Council’s Information Hub⁶. • HR will be undertaking an exercise (subject to the Brexit outcome) to ensure that all staff have the right to work in the UK going forward. 	<p>HR</p>	<p>Recorded in:</p> <ul style="list-style-type: none"> • HR Brexit Assurance Statement

²¹ Home Office: EU Settlement Scheme: Employer Toolkit <https://www.gov.uk/government/publications/eu-settlement-scheme-employer-toolkit>

²² Home Office: Apply to the EU Settlement Scheme (settled and pre-settled status) <https://www.gov.uk/settled-status-eu-citizens-families>

²³ Home Office: Employing EU, EEA and Swiss citizens and their family members after Brexit <https://www.gov.uk/guidance/employing-eu-eea-and-swiss-citizens-and-their-family-members-after-brexit>

		<ul style="list-style-type: none"> • It is likely, although to be confirmed, that the data which will need to be collected falls into the following 5 categories: British citizen, Irish citizen, EU settled status, part EU settled status, and citizen from outside the UK and EU (where visa requirements will be needed). • HR will also collect data regarding the nationality of staff. It is not currently known if this is definitely required, however, it may become obligatory in a no-deal scenario. • Collecting nationality has been examined with Information Governance and would not be classed as 'over-processing' of data. 		
<p><i>DBS Checks</i></p> <ul style="list-style-type: none"> • As an EU Member State, the UK has access to a range of EU security toolkits, including ECRIS, which was established to improve the exchange of information on criminal records throughout the EU. • If the UK leaves the EU without a deal, criminal record checks of EU national candidates applying for jobs in the UK might take much longer than they do now. 	<p><i>If the UK leaves the EU without an agreement in place, the UK reverts fully to 'third country' status. Law enforcement data and information sharing between UK and EU will be disrupted, as outlined within the 'Operation Yellowhammer: HMG Reasonable Worse Case Planning Assumptions'</i></p>	<ul style="list-style-type: none"> • Mitigation is already in place for DBS delays which allows managers, following a risk assessment, to employ individuals subject to the DBS being completed. • HR plan to notify managers of this as part of the recruitment process (once issues are more certain/ defined). 	<p>HR</p>	<p>No risks recorded</p>

<ul style="list-style-type: none"> At the moment it takes 6 days on average to receive but the average time outside the EU is 66 days. 	<p><i>document¹². The issue was raised within the Welsh Government's assessment of the impact of a no-deal Brexit²⁴.</i></p>			
<p><i>Data Flows post-Brexit</i></p> <ul style="list-style-type: none"> In a 'no-deal' scenario, transfers of personal data from the EEA to the UK will be affected Although it is the ambition of the UK and EU to eventually establish an adequacy agreement (a term given to countries outside the EU that have data protection measures deemed essentially equivalent to European standards), this will not be achieved until after Brexit and is outside the control of local government Until an adequacy decision is in place, organisations will need to consider how to make and receive transfers lawfully after exit data (such as by entering into standard contractual clauses between the sender and receiver of personal data). Additionally, whilst it was good practice to implement 'Privacy by Design' prior to the Data Protection Action 2018, it was not mandated. As a result, legacy systems/ contracts/ processing activities have not necessarily been reviewed. 	<p><i>The Information Commissioner's Office provides up-to-date guidance and resources in relation to data protection post-Brexit²⁵. The issue was outlined within the UK Government's 'Operation Yellowhammer: HMG Reasonable Worst Case Planning Assumptions' document¹². The issue was raised within the Welsh Government's assessment of the impact of a no-deal Brexit⁵.</i></p>	<ul style="list-style-type: none"> The Information Commissioner continues to update guidance on GDPR and a no-deal Brexit relating to international data transfers, the latest of which was published w/c 12 August 2019. The Council's Statutory Data Protection Officer has been tasked with reviewing the information currently being collated through the Council's preparation of the Record Processing Activity. Cardiff Council is working to understand and map its data flows – particularly to understand if any transfers are or will become restricted transfers under UK or EU data protection law on exit date. The Statutory Data Protection Officer will advise if there are any transfers that are of concern in line with the latest ICO guidance and will identify potential controls. 	Information Governance	<p>Recorded in:</p> <ul style="list-style-type: none"> Finance Brexit Assurance Statement

²⁴ Welsh Government: Preparing for a No Deal Brexit https://gov.wales/sites/default/files/publications/2019-09/preparing-for-a-no-deal-brexit_0.pdf

²⁵ Information Commissioner's Office: Data Protection and Brexit <https://ico.org.uk/for-organisations/data-protection-and-brexit/>

		<ul style="list-style-type: none"> • As a Data Controller, the Council is already required to have in place standard contracts with organisations and businesses that process data on our behalf; Data Processing Agreements are key in ensuring that there are adequate controls in place. • Cardiff Council took the view that every supplier of goods and services would receive a variation to the exiting contractual agreement. This would mitigate the risk of any potential two way data follows with (predominantly sub) contractors based in countries that will remain in the EU post the UK's exit. • The Council has sent out over 8,500 revised Data Processing Agreements that set out organisational and technical controls related to roles and responsibilities, liabilities etc., including, for example, to contractors who process electoral data. • Information and guidance is also to be distributed to Cardiff's schools. 		
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<p><i>Potential General Election and/or Referendum</i></p> <ul style="list-style-type: none"> • There are potential risks associated with leaving/ not leaving the European Union and the following being called: <ul style="list-style-type: none"> • General Election • Referendum • The predominant risk is in relation to arranging and managing elections and/ or referendums at short notice. 	<p><i>This is a known issue given the parliamentary uncertainty surrounding Brexit.</i></p>	<ul style="list-style-type: none"> • Desk-based project planning is being undertaken to assist in preparing for unscheduled polls. • The key issues remains the actual date of the election and formal confirmation that the poll will proceed. • Once this information has been confirmed, practical actions and resources can be authorised to book polling stations, hire count venues, recruit and train staff and print/ purchase significant volumes of election stationary (i.e. ballot papers, postal votes, polling station sundries). 	<p>Governance and Legal</p>	<p>Recorded in:</p> <ul style="list-style-type: none"> • Governance and Legal Directorate Risk Register
<p><i>Changing Legislation</i></p> <ul style="list-style-type: none"> • Preparing to leave the EU has required a substantial programme of legislation. • While EU-derived laws are due to be copied on to the UK statute book at the point of exit by the EU (Withdrawal) Act, a significant amount of secondary legislation has been required to amend this body of law to ensure it continues to operate effectively once the UK has left the EU. • Whilst responsibility for this lies with the UK/ Welsh Government, changing legislation will have an impact on the delivery of the Council's service areas. 	<p><i>This is a known issue as the UK prepares to leave the EU. The issue was raised within the Welsh Government's assessment of the impact of a no-deal Brexit⁵.</i></p>	<ul style="list-style-type: none"> • The Council continues to monitor changes in legislation, linking with relevant forums and regional/ national bodies. • The Council continues to engage with specific service discussions at a local, regional and national level. 	<p>Corporate Issue</p>	<p>No risks recorded</p>

Shared Regulatory Service (SRS)				
<ul style="list-style-type: none"> • Whilst existing legislation will continue to apply immediately post-Brexit, there are concerns that in time the rules regarding Environmental Health and Trading Standards will become uncertain. • Changing legislation may lead to increased demand from businesses (for example, from those who need Export Health Certificates (EHCs) and/ or advice in relation to distance selling and e-commerce and product safety etc.) • There is a risk that this may in turn lead to a breakdown in regulatory control, leading to consumer uncertainty and potential shortages of products and foods. • There are potential public health implications linked to this, as well as economic loss due to business uncertainty (alongside the lack of ability to import and export products to and from the EU if a no-deal situation exists). 	<p><i>The UK Government has published numerous pieces of guidance which consider regulations and standards after Brexit²⁶.</i></p>	<ul style="list-style-type: none"> • A risks assessment has been completed by the Shared Regulatory Service, including local and corporate actions/ planning, which is continuing to be monitored and updated. • Officer authorisations have been amended to take into account the changes to legislation that are taking place as a result of the EU Withdrawal Act 2018, and to ensure that officers will continue to regulate businesses post-Brexit. • In some specific areas, such as food safety, the Shared Regulatory Service has been following the Welsh Government lead in reviewing capability to provide Export Health Certificates (EHCs) to businesses (where required) following Brexit. • Officers are attending briefing and training sessions across the range of Trading Standards and Health disciplines to ensure that they are kept informed of the latest Regulatory Brexit implications. 	<p>Shared Regulatory Service</p>	<p>Recorded in:</p> <ul style="list-style-type: none"> • Shared Regulatory Services Risk Register – this is separate to the Council’s Directorate Risk Registers

²⁶ UK Government: Regulations and standards after Brexit <https://www.gov.uk/guidance/regulations-and-standards-after-brexit>

Returners from the EU				
<ul style="list-style-type: none"> • There is a risk that UK emigrants will return to the UK, requiring local government support/ services. • There is little local level emigration data to deduce an estimate of expected UK returnees from the EU. Using the migration data available we can estimate that, since 2012, 4,094 individuals have emigrated from Cardiff to the EU. 	<p><i>The issue was raised in a Welsh Government letter to the WLGA. The UK Government has produced two policy papers on citizens' rights in the event of a no-deal Brexit^{27 28} and the European Commission has published an overview table and Q&A regarding the rights of UK nationals residing in the EU²⁹. The issue was raised within the Welsh Government's assessment of the impact of a no-deal Brexit⁵.</i></p>	<ul style="list-style-type: none"> • It is not possible to estimate what percentage of UK emigrants to the EU will return to the UK within any given timescale. • In a no-deal scenario, arrangements will be made to ensure continuity of payments for those who return and are already in receipt of UK state pension or other UK benefits while living in the EU. UK nationals considering returning to the UK and planning to make new applications for benefits and services have been advised to check eligibility requirements on gov.uk. The usual entitlement conditions, which exist for both resident and returning UK nationals, will apply and the UK Government expect most returning UK nationals will be able to satisfy the necessary eligibility requirements. • In the case of a no-deal scenario, UK nationals returning to live in the UK who meet the ordinary residence test will be able to use NHS and Education Services. 	Corporate Issue	<p>Recorded within:</p> <ul style="list-style-type: none"> • Housing and Communities Brexit Assurance Statement

²⁷ Citizens' Rights – EU citizens in the UK and UK nationals in the EU

https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/790570/Policy_Paper_on_citizens_rights_in_the_event_of_a_no_deal_Brexit.pdf

²⁸ Citizens' Rights – UK nationals in the EU

²⁹ European Commission: Citizens' rights https://ec.europa.eu/info/brexit/brexit-preparedness/citizens-rights_en

		<ul style="list-style-type: none">• In relation to UK nationals with EU or non-EU national family members, bringing close family members back to the UK depends on when the relationship started. For relationships that began before Brexit, UK nationals will be able to be joined by their spouse or partner and other existing close family members (and they can apply to the EU Settlement Scheme) until 29 March 2022. For relationships that began after Brexit, the deadline is until 31 December 2020. After these dates, UK Family Immigration Rules will apply.		
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Economy

Issue	Source	Mitigation	Responsibility	Is this recorded in the Corporate/ Directorate Risk Register?
Cardiff-wide Economic Impacts				
<ul style="list-style-type: none"> The long-term impact³⁰ on Wales of a no-deal Brexit is estimated to be broadly similar to the UK as a whole; a negative impact on the economy of 8.1%. Many Cardiff-based firms are reliant on access to EU markets: 46% of Cardiff's exports go to the EU. In the short-term³⁰, a no-deal Brexit could result in a recession, rises in inflation (such as an increase in food/ fuel prices) and unemployment, placing pressure on real incomes and real consumer spending. Brexit could also lead to a decline of investment trends. 	<p><i>Welsh Government economic analysis was provided in the September 2019 paper 'A Brighter Future for Wales: Why we should remain in the EU'³¹.</i></p>	<ul style="list-style-type: none"> Economic Development are producing an assessment of the local economic implications of a no-deal Brexit, including a position as to what the Council can and cannot do to address local economic shocks (such as a recession). 	Corporate Issue	No risks recorded
Local Businesses				
<p><i>Support for Businesses and the Labour Market</i></p> <ul style="list-style-type: none"> The current uncertainty about the form of Brexit is extremely challenging for 	<p><i>The UK Government publishes up-to-date guidance for businesses regarding Brexit³². The</i></p>	<ul style="list-style-type: none"> Given the unprecedented nature of the sort of economy-wide adjustment that would be required 	Economic Development	No risks recorded

³⁰ The Long-term impact can be interpreted as around 15 years after the UK's new relationship with the EU comes into effect, whereas the short-term can be interpreted as the five years following the UK's withdrawal from the EU.

³¹ A Brighter Future for Wales: Why we should Remain in the EU https://llyw.cymru/dyfodol-mwy-disglair-i-gymru-y-rhesymau-dros-aros-yn-yr-ue?_ga=2.174845541.636311140.1569429473-1413181683.1557838270

³² UK Government: Find Brexit guidance for your business <https://www.gov.uk/find-eu-exit-guidance-business>

<p>businesses across the UK. Information available is typically generic, making it exceedingly difficult for businesses to plan.</p> <ul style="list-style-type: none"> • The Confederation of British Industry (CBI) published a report in July 2019 which concluded that no one is ready for a no-deal Brexit. • Some sectors are particularly exposed in terms of having a high number of staff who are EU nationals (these are estimated as being: wholesale and retail trade; human health and social work activities; and education). There is therefore a need to ensure that workers are aware of and engaged in the EU Settlement Scheme (EUSS). • Recruitment/ retention difficulties may therefore be exacerbated in some sectors due to immigration restrictions for EEA nationals or EEA nationals choosing to leave the UK. • Furthermore, there are sectors (with large and medium sized firms) which could be vulnerable to the EU transition process in a broad sense. For instance, in relation to the effect of tariffs on firm inputs, effects linked to loss/ reduced access to EU 	<p><i>Welsh Government’s Business Wales Portal is also a ‘starting point’ for all businesses in Wales as they prepare for Brexit³³. In July 2019 the Confederation of British Industry (CBI) published a report which put forward 200 recommendations to help with no-deal preparations for UK, EU and companies³⁴. The Welsh Government commissioned Cardiff Business School to produce the report ‘EU Transition and Economic Prospects for Large and Medium Sized Firms in Wales’ in August 2017³⁵. The issue was raised within the Welsh Government’s assessment of the impact of a no-deal Brexit⁵.</i></p>	<p>in a no-deal scenario, it is impossible to accurately predict the ability of businesses to adapt.</p> <ul style="list-style-type: none"> • In order to encourage dialogue with businesses to ensure that they are aware of the issues in terms of Brexit, alongside the support and processes that are being put in place (including the EUSS), Cardiff Council is planning to host an employer/ business engagement event. • The event is scheduled to take place in October 2019, being generic, covering all sectors. • The Council is also planning to host a Brexit Round Table Event, which will see a selection of core businesses/ business leaders in Cardiff discuss key matters surrounding Brexit. The date of the event is to be confirmed. • The Council is also working separately to engage specifically with sectors in Cardiff who have a high EU national workforce. 		
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³³ Business Wales Brexit Portal https://businesswales.gov.wales/brexit/home?_ga=2.106936323.1058582051.1566300912-1549168702.1563185233

³⁴ What comes next? The business analysis of a no-deal <https://cbicdnend.azureedge.net/media/3093/what-comes-next.pdf?v=20190808.1>

³⁵ EU Transition and Economic Prospects for Large and Medium Sized Firms in Wales (August 2017) https://gov.wales/sites/default/files/publications/2019-05/eu-transition-and-economic-prospects-for-large-and-medium-sized-firms-in-wales_0.pdf

<p>networks and institutions etc. The sectors considered most at risk include: Aerospace systems and services; automotive, transportation and related; and electrical engineering components, semiconductors. However, it must be noted that often the particular circumstances facing individual business and the characteristics of the sector to which they belong. Outcomes will also be influenced by supply chain effects, impacts on imported inputs and by the potentially large macroeconomic consequences.</p>		<ul style="list-style-type: none"> • The Council is continuing to push a signposting service for support for businesses – such as Business Wales and Central Government support/ guidance • The Council is also seeking the views of businesses on the impact of a no-deal Brexit. Part of this will include sending out a survey, with questions regarding the impact on employees and turnover, alongside specific support businesses require to plan for a no-deal Brexit. 		
<p><i>Trade and Regulations</i></p> <ul style="list-style-type: none"> • In a no-deal scenario, both the UK and the EU would need to apply customs and excise rules and VAT to goods moving between the UK and EU, as they are currently applied to goods traded in the rest of the world. Many businesses (who currently only trade with the EU) would need to interact with customs processes for the first time. 	<p><i>If the UK leaves the EU without a Withdrawal Agreement, the EU will treat the UK as a third country for trade in goods and services. All rights and reciprocal arrangements with the EU end. The UK Government continues to issue guidance in this area^{36 37 38 39}. The issue was raised within the</i></p>	<ul style="list-style-type: none"> • The Council is continuing to push a signposting service for support for businesses – such as Business Wales and Central Government support/ guidance. • It is important that businesses in Cardiff are supported to develop greater international trade and investment opportunities, particularly from emerging markets. 	<p>Economic Development</p>	<p>No risks recorded</p>

³⁶ Regulations and standards after Brexit <https://www.gov.uk/guidance/regulations-and-standards-after-brexit>

³⁷ Check temporary rates of customs duty (tariffs) on imports after a no-deal Brexit <https://www.gov.uk/guidance/check-temporary-rates-of-customs-duty-on-imports-after-eu-exit>

³⁸ Exporting after Brexit if there's no deal – country by country <https://www.gov.uk/government/collections/exporting-after-eu-exit-country-by-country>

³⁹ Selling services to the EU, Switzerland, Norway, Iceland and Liechtenstein after Brexit <https://www.gov.uk/guidance/providing-services-to-any-country-in-the-eu-iceland-liechtenstein-norway-or-switzerland-after-eu-exit>

<ul style="list-style-type: none"> • There are therefore unquantifiable risks related to complex supply chains and regulatory issues. • Although the Government has made progress in ensuring that additional controls at the UK border would not cause disruption, including phasing Entry Summary Declarations and Transitional Simplified Procedures, those imposed by Member States could be disruptive. • Industries will also need to respond to the application of EU tariffs (these would vary by sector). While for some sectors the effect of any tariffs would be minor, other sectors would be more affected (for example, the EU would introduce tariffs of around 70% on beef and 45% on lamb exports from the UK, and 10% on finished automotive vehicles). 	<p><i>Welsh Government's assessment of the impact of a no-deal Brexit⁵.</i></p>			
<p>Cardiff's Port</p>				
<p><i>Potential for Disruption</i></p> <ul style="list-style-type: none"> • There is a potential for disruption to imports and exports, along with issues in terms of the potential customs regime and what checks could be required post-Brexit. • There are no Border Inspection Points (BIPS) in Wales and, as such, food of animal origin or high risk foods not of animal origin cannot be imported through a Welsh port. 	<p><i>If the UK leaves the EU without a Withdrawal Agreement, the EU will treat the UK as a third country for trade in goods and services. All rights and reciprocal arrangements with the EU end. The UK Government has</i></p>	<ul style="list-style-type: none"> • Whilst the potential for disruption to imports and exports is a matter for customs and not the Shared Regulatory Service, the Service will liaise with customs and refer matters should the need arise. • The Shared Regulatory Service are monitoring vessel movements in and out of the port. 	<p>Shared Regulatory Services</p>	<p>Recorded in:</p> <ul style="list-style-type: none"> • Shared Regulatory Services Risk Register – this is separate to the Council's Directorate Risk Registers

<ul style="list-style-type: none"> There is a risk in that attempts will be made to import such products in a no-deal Brexit. 	<p><i>considered the consequences of this and how supplies might be influenced/ disrupted¹³. The issue was raised within the Welsh Government's assessment of the impact of a no-deal Brexit⁵.</i></p>	<ul style="list-style-type: none"> There has not been any food arriving into the Cardiff port over the past 12 months and the Service is not aware of any food exports through the port. Monitoring is planned to increase to determine whether no-deal Brexit influences this in any way (but there is currently no indication of this). 		
EU Funding post-Brexit				
<p><i>The Future of Regional Funding</i></p> <ul style="list-style-type: none"> In financial terms, Wales is a net beneficiary of EU membership, currently receiving about £680 million in EU funding per annum. In the event that the UK leaves the EU in October 2019 without a deal, the UK Treasury has provided a full lifetime expenditure guarantee for projects approved before the end of December 2020. The Council currently has two live projects supported by approximately £1.2 million in funding through the European Social Fund (ESF): Inspire2Achieve and Communities4Work. 	<p><i>The UK Government has published information regarding the background and issues for consideration concerning the proposed Shared Prosperity Fund⁴⁰. Furthermore, in December 2017, the Welsh Government published a policy paper regarding Regional Investment in Wales after Brexit⁴¹. The issue was raised within the Welsh Government's assessment of the impact of a no-deal Brexit⁵.</i></p>	<ul style="list-style-type: none"> Discussions are planned to take place, where relevant, as to whether the Council can continue as a project partner on certain EU programmes (such as URBACT). Alternative options/ arrangements will be considered if issues arise. There is currently no clarity on what the UKSPF will look like, including how the funding will be allocated between the countries and regions of the UK. The Welsh Government is working to develop a future investment framework in Wales so that there is no gap in investment to 	Economic Development	No risks recorded

⁴⁰ The UK Shared Prosperity Fund <https://researchbriefings.parliament.uk/ResearchBriefing/Summary/CBP-8527>

⁴¹ Regional Investment in Wales after Brexit <https://gov.wales/sites/default/files/publications/2018-10/regional-investment-in-wales-after-brexit.pdf>

<ul style="list-style-type: none"> • Whilst an expenditure guarantee has been provided, for projects where the UK will be outside the programme structure (for example, URBACT), discussions will be required as to whether the Council can continue as a project partner. • Even if a deal were to be reached, EU structural funds will come to an end after withdrawal. The replacement for the EU funds is entirely a domestic UK matter. • It is unclear how much funding the Council will receive through the United Kingdom Shared Prosperity Fund (the UK Government proposed alternative funding system). 		<p>businesses, people and communities. The work is, however, contingent on full funding and autonomy being met by UK Government.</p> <ul style="list-style-type: none"> • It is therefore difficult to prepare until clarity is given on what the UKSPF will look like or how it will be allocated across the UK. • Economic Development continue to monitor UK and Welsh Government updates. 		
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Major Disruption

A number of reports have speculated that there may be major disruptions arising as a result of Brexit, particularly a No-Deal Brexit. The Council has reviewed its Business Continuity Planning arrangements which take account of major incidents.

Issue	Source	Mitigation	Responsibility	Is this recorded in the Corporate/ Directorate Risk Register?
Protests				
<ul style="list-style-type: none"> The potential for social unrest following any withdrawal from the EU, as neither Leave nor Remain voters feel their concerns are being met. 	<p><i>The issue was outlined within the UK Government's 'Operation Yellowhammer: HMG Reasonable Worst Case Planning Assumptions' document¹².</i></p>	<ul style="list-style-type: none"> The Council has well-established Business Continuity Arrangements and Emergency Management structures which will account for some of the potentially major disruptions associated with Brexit. This includes partnership working (such as with the South Wales Police). 	Corporate Issue	Recorded in: <ul style="list-style-type: none"> Corporate Risk Register
Food Shortages				
<ul style="list-style-type: none"> Within a report which analyses the implications for business and trade of a no-deal exit¹¹, the UK government states that there is the potential for disruption to the food supply chain with border delays likely. 30% of the UK's food supply comes from the EU and therefore, although our food supply is diverse, resilient and sourced from a wide variety of countries, the potential for disruption to trade across the Short Channel Crossings would lead to 	<p><i>The issue was outlined within the UK Government's 'Operation Yellowhammer: HMG Reasonable Worst Case Planning Assumptions' document¹². The issue was raised within the Welsh Government's assessment of the impact of a no-deal Brexit⁵.</i></p>	<ul style="list-style-type: none"> The Council has well-established Business Continuity Arrangements and Emergency Management structures which will account for some of the potentially major disruptions associated with Brexit. This includes partnership working (such as with the Food Standard Agency (FSA)). 	Corporate Issue	Recorded in: <ul style="list-style-type: none"> Corporate Risk Register

<p>reduced availability and choice of products.</p> <ul style="list-style-type: none"> This would not lead to an overall shortage of food in the UK, and less than 1 in 10 food items would be directly affected by any delays across the Short Channel Crossings. However, in the absence of other action from Government, some food prices are likely to increase, and there is a risk that consume behaviour could exacerbate, or create, shortages in this scenario. 				
<p>Disruption to Water Supply (Infrastructure)</p>				
<ul style="list-style-type: none"> The most significant water-specific risk that has been identified is the possibility that congestion at ports or on roads could delay the import of chemicals used in water and wastewater treatment processes. Companies are trying to ensure that they carefully manage the supplies of key water treatment chemicals but for those chemicals with a short shelf-life, problems could arise if there were delays in delivery over a sustained period of time. Any shortage of water treatment chemicals could also impact on those private water supplies regulated by local authorities using chemical treatment to ensure safe drinking water. 	<p><i>The issue was outlined within the UK Government’s ‘Operation Yellowhammer: HMG Reasonable Worst Case Planning Assumptions’ document¹². The issue was raised within the Welsh Government’s assessment of the impact of a no-deal Brexit⁵.</i></p>	<ul style="list-style-type: none"> The Council has well-established Business Continuity Arrangements and Emergency Management structures which will account for some of the potentially major disruptions associated with Brexit. This includes partnership working / joint action planning (with Public Health Wales and Dwr Cymru). 	<p>Corporate Issue</p>	<p>Recorded in:</p> <ul style="list-style-type: none"> Shared Regulatory Services Risk Register – this is separate to the Council’s Directorate Risk Registers

Fuel Shortages/ Disruptions to Transport				
<ul style="list-style-type: none"> • Border delays could lead to severe traffic disruption, which could affect the distribution of fuel. • This in turn could lead to disruptions to transport. • Furthermore, UK citizens travelling to and from the EU may be subject to increased checks at border posts. It is likely delays will occur for UK arrivals and departures at EU airports and ports, which could also cause some disruption on transport services. 	<p><i>The issue was outlined within the UK Government's 'Operation Yellowhammer: HMG Reasonable Worst Case Planning Assumptions' document¹². The issue was raised within the Welsh Government's assessment of the impact of a no-deal Brexit⁵.</i></p>	<ul style="list-style-type: none"> • The UK Government Guidance Note on Oil and Gas suggest that the UK has existing provisions to maintain emergency oil stocks that can be released in response to disruptions to the oil market. This can, however, be compounded by consumer behaviour. • The Council has well-established Business Continuity Arrangements and Emergency Management structures which will account for some of the potentially major disruptions associated with Brexit. • As we enter October 2019, the Council will be consciously increasing tank levels despite price fluctuations to ensure that volume and high levels of stock take priority. 	Corporate Issue	Recorded in: <ul style="list-style-type: none"> • Corporate Risk Register
Outbreak of Disease				
<ul style="list-style-type: none"> • Any disruption that reduces, delays or stops the supply of medicines for UK veterinary use would reduce our ability to prevent and control disease outbreaks, with potential harm to animal health and welfare, the environment and wider food safety and availability, as well as, in the case of zoonotic diseases, posing a risk to human health. 	<p><i>The issue was outlined within the UK Government's 'Operation Yellowhammer: HMG Reasonable Worst Case Planning Assumptions' document¹². The issue was raised within the Welsh Government's</i></p>	<ul style="list-style-type: none"> • The Council has well-established Business Continuity Arrangements and Emergency Management structures which will account for some of the potentially major disruptions associated with Brexit. This includes partnership working / joint action planning (with Public Health Wales and Dwr Cymru). 	Corporate Issue	Recorded in: <ul style="list-style-type: none"> • Corporate Risk Register

	<i>assessment of the impact of a no-deal Brexit⁵.</i>			
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