

## Brexit Working Group: Risk &amp; Action Plan

This document captures specific risk scenarios and actions identified by the Working group at a corporate level. Risk and Business Continuity Plans remain in place at a service level, and all Managers have responsibility for regularly reviewing these. Each Scenario has been given an impact score to highlight the potential severity of change the scenario could cause and a likelihood score to indicate how likely the scenario is to happen once Brexit occurs. Each score is out of 5, the higher the score the bigger the impact/the more likely the scenario is to happen. Outcomes marked green indicate where no further action is required and/or an action has been completed.

SCENARIO	IMPACT	IMPACT SCORE	LIKELIHOOD SCORE	TOTAL SCORE	ACTION	OWNER	TIMESCALE	UPDATE / COMMENTS	Outcome
<b>Finance, Commissioning and Procurement</b>									
Supply chain resilience / failure	Commissioned services not delivered  Failure to look after those in the care of the council  Damage to reputation of the council	4	3	12	Ask tier 1 (contracts worth over £1m per annum or of strategic significance) care providers for copies of their risk and contingency plans for managing Brexit	Commissioning & Procurement (Stephen Hopkins)	Communications went out before the original Spring deadline. Further communications are now planned to go out in September 2019 before October 31 <sup>st</sup> .	Croydon has been in contact with all its tier 1 providers relating to their preparations for Brexit to underline the potential risks. Where relevant the council has received Brexit contingency plans from suppliers and updates.  There is a danger of providers not taking the preparations seriously due to lack of certainty around Brexit.  Guidance has been provided to Contract Managers across the Council regarding Brexit impact and contingency plans.	Commissioning and Procurement will continue communication with key suppliers to ensure they are aware of key Brexit developments and preparations are in place.
					Include Brexit item in regular provider forum meetings to discuss emerging issues and the implications of all scenarios including No Deal	Commissioning & Procurement (Stephen Hopkins)	Ongoing	Brexit, including the prospect of a no deal, is now a standing item on the agenda for the provider forum meetings.	Issues to be escalated from the provider forum to the Brexit Board if required.  Letters and questionnaires to be issued to all suppliers before the end of September 19 requesting further updates and then regular emails
					Ask tier 1 providers if they are funding settled status applications for their staff (as this may impact cost to Council)	Commissioning & Procurement (Stephen Hopkins)	Raising awareness through Contract management activity in Q3 and Q4 2018/19.	It has been announced that the Government will not charge for settled status applications. This exercise is therefore more of an exercise to ensure providers are proactively making employees aware of the process of settled status applications.	<b>No further action. Monitoring continuing via tier 1 scorecards and communications</b>
					Review the impact on Community Equipment Services as Council supplies/has contracts for equipment to other Councils	Commissioning & Procurement (Stephen Hopkins)	Up until 31 <sup>st</sup> October	Currency fluctuation- Suppliers are being encouraged to purchase as much currency as possible in advance to reduce the impact of a devaluation of the pound.  Delay at customs- Suppliers asked to hold 6 to 12 weeks of stock and hold extra material if manufacturing in the UK	Communication with suppliers is ongoing to mitigate the impact on Community Equipment Services.

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					Ask Veolia (waste disposal supplier) for copies of their risk and contingency plans for managing Brexit	Environmental Health (Steve Iles)	Feb 2019	<p>We have received a copy of Veolia's Brexit Summary paper, summarising the impacts and mitigations regarding a no-deal Brexit.</p> <p>Veolia has in place a Brexit Steering Group that is monitoring the impact Brexit will have across businesses including Supply Chain issues, Human Resources and future costs and implications. The group meets on a monthly basis or as required and often includes input from subject matter experts outside of the organisation.</p> <p>Veolia are planning primarily for a no-deal scenario as this is considered not only likely but also the most damaging.</p> <p>We have also received information from Viridor who are responsible for Croydon and SLWP general waste disposal through the EFW at Beddington.</p> <p>Concern raised at London regional level re: implications of delays to these critical waste services.</p>	Copies of comprehensive plan received. No further action.
					Monitor and report on price variation requests	Commissioning & Procurement (Stephen Hopkins)	Q3 and Q4 2018/19 Q1 and Q2 2019/20	No visible price variation to report to date as a result of Brexit	Monitoring in place. No issues at this stage.
					Identify and capture costs incurred by Council associated with Brexit	Finance (Lisa Taylor)	2019/20	Government announced £36.6 million for local government planning. Croydon has so far been allocated a total of £315,000	Brexit cost centre established
Funding loss	The council has fewer resources to deliver key services	3	4	12	Identify any EU funded projects and continue to monitor central government announcements for Shared Prosperity Fund information	Finance (Lisa Taylor)	Q4 2019/20 Q1-3 2020/21	<p>Several EU funded projects have been identified upon review.</p> <p>No future actions at this stage as detail of Shared Prosperity fund not yet released. The Council will continue to monitor announcements regarding the Shared Prosperity Fund.</p>	Ongoing monitoring of shared prosperity fund news
<b>Workforce</b>									
EU citizens leave UK or do not come to the UK	Staff shortages leading to failure to deliver services or a drop in the quality of service delivery	3	3	9	Council to pay settled status application fee for staff earning less than £35,000, and their partners and children	HR (Sue Moorman)	Applications must be complete by June 2021 (December 2020 if no deal)	Government discussions continuing regarding EFTA citizens, but same process likely to apply.	No further action.
	Uncertainty about working rights				Identify staff that need to apply for settled status. EU, EFTA, Swiss.	HR (Sue Moorman)	Completed May 2019 with further action to be considered if appropriate	Communications have already come out aimed towards staff and indicating resources available. The Council does not have data to indicate all staff who need to apply for settled/pre-settled status although new starters coming are	Being reviewed at each project meeting

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	Skills shortages, e.g. in construction, retail, social care							starting to have data recorded regarding nationality.  A Staff campaign in May linked in with the launch of Myresources asked staff to submit their equality information.  If further work is still deemed to be required a staff census carried out by HR and/or further actions are to be considered by the Brexit Board.	
	Increase in labour costs, potentially impacting large investment and development projects				Consider developing career pathways for any areas facing skills shortages	Employment & Skills (Emma Lindsell)	Health & Care and Construction in delivery Feb 19  New pathways established when demand assessed – monthly review via Economic Growth Departmental Management Team	Pathways to employment in place for the care sector and construction. Croydon Works working in partnership with CALAT, care providers on vocational pathways into care sector.  Construction training pathways in place focusing on Construction Skills Certificate Scheme card training/entry level position – working in partnership with the Croydon College to develop vocational course such as plumbing/carpentry/scaffolding.  Other pathways/projects can be developed once risks to other sectors established e.g. warehouse/logistics and hospitality	Skills pathways in place
	Failure to look after those in care of the council that require settled status				Identify children in care and care leavers that require settled/pre-settled status application	Children's Services (Nick Pendry)	Deadline for applications is June 2021	Work is underway to identify those young people that are required to make a settled status application. This is planned to be completed by September 2019.  Young people will be supported by key/social worker to make application by the deadline, with help from Registrars as required.	The Council has identified LAC who are EU/EEA nationals – work is ongoing to ensure the council applies for the EUSS on behalf of these Looked After Children
	Uncertainty over rights of children in care and associated costs to the council				Engage with schools to provide guidance and capture issues/concerns	Education (Shelley Davies)	Termly	• BREXIT Guidance and information sent out in term Director of Education's Newsletter to schools.	No further action
<b>Communications</b>									
Residents uninformed about national Brexit strategy.	More people coming to the council for advice and guidance  Businesses and residents angry if	4	4	16	Develop and implement communications plan <ul style="list-style-type: none"> <li>Dedicated webpages</li> <li>Support for staff</li> </ul>	Communications (Helen Parrott)	Q4 2019/20 Q1 2020/21	<ul style="list-style-type: none"> <li>A dedicated Brexit mailbox has been set up for internal staff: <a href="mailto:brexitquestions@croydon.gov.uk">brexitquestions@croydon.gov.uk</a>. This has been promoted to the workforce via an intranet news article.</li> <li>Internal and external webpages established.</li> </ul>	The Brexit Inbox is monitored frequently. So far minimal enquiries are being received.

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	<p>there is not clear messaging</p> <p>Businesses and residents make decisions based on misinformation or fear</p> <p>Uncertainty means businesses hold off from spending and investment</p> <p>Uncertainty for Voluntary Community Sector (VCS) organisations around status of employees and volunteers</p> <p>Uncertainty for VCS organisations about funding</p> <p>Resources at key council access points become stretched due to high demand</p> <p>Civil unrest concentrated at council access points</p>				<ul style="list-style-type: none"> <li>External communications to general population (e.g. #CroydonisOpen, #LondonisOpen, Compassionate Neighbour)</li> <li>External communications to business (e.g. business toolkit, awareness of EU citizens' rights to residency and work)</li> <li>Councillors, including 2 way communications to capture issues</li> </ul>				The web pages ate to be updated following Gov.uk launching their Brexit preparations page (gov.uk/Brexit)
					Settlement scheme campaign materials to be distributed to key locations including libraries and Access Croydon.	Communications and Policy & Strategy (Anna Quigley / Gavin Handford)	ASAP	<ul style="list-style-type: none"> <li>London Councils have confirmed a portal is to be set up from which the council can order materials. The date for this portal is yet to be announced.</li> </ul>	Materials have been seen and will be ordered once the portal is up and running.
					Share information and guidance regarding Brexit / settlement scheme with VCS organisations	Communities Team (Gavin Handford)	January 2019	<p><a href="https://www.gov.uk/government/news/new-fund-to-support-vulnerable-eu-citizens-apply-for-settled-status">https://www.gov.uk/government/news/new-fund-to-support-vulnerable-eu-citizens-apply-for-settled-status</a></p> <p>Met with Croydon Voluntary Action and Black Minority Ethnic Forum to share Community Toolkit with their members through their regular communications channels. No issues raised.</p>	No further action at this stage
					Confirm support through Access Croydon / libraries for EU citizens (advice, guidance, application support)	Gateway Services	Completed April 2019	<p>Access Croydon have government toolkit in place for supporting EU citizens.</p> <p>Brexit is a standing item at Gateway team meetings to monitor levels of enquiries. No significant levels to date.</p> <p>provision available via <b>Access Croydon as of April 2019</b></p> <ul style="list-style-type: none"> <li>21 Terminals in Access Croydon for residents to access online information (in constant use at the moment)</li> </ul>	Support now confirmed. No further action planned.

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								<ul style="list-style-type: none"> <li>○ 2 members of staff (1 at lunchtime) - greeting and signposting</li> <li>○ Very limited capacity to support residents requiring support</li> </ul> <p>provision in <b>Croydon Libraries as of April 2019</b></p> <ul style="list-style-type: none"> <li>○ Libraries require members of the public to be members to access PCs</li> <li>○ Libraries staff have limited capacity to provide any support</li> </ul>	
					Explore option of establishing a European Union Settlement Scheme (EUSS) centre to support resident application for settled and pre-settled status.	Gateway Services ( Joseph Egan)	June 2019	<ul style="list-style-type: none"> <li>• Croydon Registrars have submitted a Expression Of Interest for the European Union Settlement Scheme (EUSS) service</li> <li>• If selected, registrars would provide a service that supports the upload and verification of identity documents.</li> <li>• The Brexit Board has elected to offer a free service for all.</li> <li>• The Service to be funded by portion of the allocated Brexit funding.</li> </ul>	<p>The service to support EU nationals with their documents as part of their application to the EU settlement scheme is now in place. The scheme will be kept under review.</p> <p>Home Office stats indicate over 11,000 EU nationals in Croydon have sent in applications via the EU Settlement Scheme (around 1 third of the total in the borough).</p>
					Clarify EU citizens right to vote / stand for election	Legal / Electoral services (Jaqueline Harris-Baker)	Feb 2019	Government confirmed policy allowing EU citizens to vote and stand for elections in 2019 (and serve full time if elected)	No change. No further action required.
					Slides for Executive Leadership Team (ELT) on Brexit prep	Henry Butt (Policy & Strategy team)	September 2019	Slides being drafted to be presented to ELT summarising Brexit prep to date and need for services to take responsibility to effectively identify and mitigate concerns in their area. Finalised slides to be cascaded further down the council.	Slides in process of being finalised and to be finished by end of presented by end of September 2019.
					Council to contact and work with South West London Law Centre's (SWLLC's) Immigration Department who currently run a Home Office-funded EU Settlement Scheme project to register	Viviane Nicoue (Gateway Services)	September 2019	<p>SWLLC can provide legal advice for EU nationals looking for support in their application to the EU Settlement Scheme so long as they meet their vulnerability criteria.</p> <p>The Council is in communication with SWLLC to ensure those applying for settled/pre-settled status</p>	Effective communications for staff and residents signposting to SWLLC is to be put in place September 2019.

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					vulnerable individuals for settled/pre-settled status.			who are vulnerable have awareness of and access to dedicated legal support.	
<b>Economy</b>									
Economic decline or recession	Reduction in employment and rise in demand for council services	4	4	16	Regularly assess impact on local economy	Economic Development (Carol Squires)	Q4 2019/20 Qs 1-3 2020/21	The impact of on the business community is assessed through the Croydon Business Network (CBN). The CBN work in partnership to share data and established relevant support and signposting as needed.	Ongoing
	Reduced confidence and slowdown in investment and spending, impacting large infrastructure and development projects				Develop support packages for businesses impacted by Brexit, including signposting to toolkits	Economic Development (Carol Squires)	Q4 2019/20 Qs 1-3 2020/21	Working with the CBN, we are signposting to relevant information as appropriate. Events to support exporters and importers are being scheduled through London Chamber and South London Export.	Ongoing
	Businesses in Croydon may be impacted by higher interest rates, inflation and banking delays, as well as higher tariffs on imports from the European Union				Develop programme to promote further investment in Croydon and encourage trade	Economic Development (Carol Squires)	Q4 2019/20 Qs 1-3 2020/21	Activity to promote Croydon with overseas business networks is underway. An event working with the European Indian Network is being worked on to promote an "open for business" message prior to the 31 <sup>st</sup> October. We continue to work across London with Chambers, London & Partners & the Department of Trade and Industry to establish international links.	Ongoing
	Increased costs for the council				Ensure Growth Zone, major developments, Brick by Brick projects remain on track	Place (Shifa Mustafa/Emma Lindsell)	Monthly project review with reporting to Place DLT monthly and to Growth Board bi-monthly	The risk to projects and programmes to be reviewed monthly via current dashboard reporting mechanisms and reported to Place DLT and Growth Board on a monthly / bi-monthly basis.	Ongoing
	Impact of decreased EU funding				Assess impact of EU funds and the potential of the funding not being replaced	Economic Growth (Emma Lindsell/Kate Apted)	September 2019	Review to identify EU funded programmes that Croydon/Council benefits from.	Ongoing
								There is uncertainty around the funding around the UK Shared Prosperity which is to replace EU funding. It is difficult therefore to know the impact that the absence of EU funding will make.	
								Croydon benefits significantly from EU funding through initiatives such as the Work and Health Programme and the Energiesprong Demonstrator Project.	

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					Clarify EU citizens' rights to benefits, homelessness help, social care and other services	Gateway Services	Feb 2019	<p><b>Non-Recourse for Public Funds (NRPF)</b></p> <ul style="list-style-type: none"> <li>• Provided additional guidance from NRPF Network.</li> <li>• Identifies residents in need of support - rough sleepers, people with disabilities, mental health problems, unpaid carers etc</li> </ul> <p>Government announcement confirmed no immediate change.</p>	No further action at this stage
					Strengthen links between Croydon Works and businesses	Employment & Skills (Emma Lindsell)	Part of Business As Usual – business engagement occurs weekly and will be reviewed bi-monthly at Economic Growth EDMT starting Feb 19	<p>Strengthening links with developers and care providers ongoing.</p> <p>(Gatwick and Gatwick businesses are supporting employees with settlement applications)</p>	Ongoing
<b>Community Safety</b>									
Civil unrest	<p>Risk of violence and loss of life</p> <p>Damage to shops, buildings and homes, representing significant financial and emotional cost</p> <p>Emergency services become stretched</p> <p>Residents may feel unsafe, particularly vulnerable groups</p> <p>Erosion of social cohesion</p> <p>Potential request to provide a visible presence due to police being redeployed</p> <p>“Expected” abstraction rates of Police officers (about 30%) in order</p>	5	3	15	Monitor community tensions through VCS network and community safety team	Communities Team (Gavin Handford) Community Safety Team (Sarah Hayward)	Q4 2019/20 Qs 1-3 2020/21	<p>Significant challenges in capturing joint view of community tensions.</p> <p>A Hate Crime Action Plan has been developed through the Community Engagement &amp; Confidence Board. Some of these actions will be completed in the run up to Brexit and some will be ongoing actions. (see section 9 of the Brexit Cab report for details)</p> <p>Community Tension Monitoring meetings being established.</p>	Work Ongoing
					Hate crime awareness and monitoring	Communities Team / Community Safety Team (Gavin Handford / Sarah Hayward)	Q4 2018/19 – Q4 2019/20	<p>Hate crime awareness activities continue.</p> <p>Visits places of worship/religious leaders within the borough in the pre-Brexit run up will be undertaken in October 2019.</p> <p>Monthly Community Tension Monitoring Group now in place with council and external representatives attending including the police.</p>	Hate Crime Action plan in place.
					Developing contingency plan for deploying NSO teams if requested. Review patrolling policy in light of police deployment and community tension	Community Safety Team (Sarah Hayward)	Q4 2019/20 Qs 1-3 2020/21	Overtime budget will be required to help offset the demand for additional patrols, or at least agree a prioritisation process for officers over that time period.	Ongoing

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	to secure the ports. This may lead to Neighbourhood Safety officers being asked by the police to provide a visible sustained presence in public places for a number of weeks. Any request from the police will likely come with a short notice period of 24-48 hours.  This may also affect our single officer patrolling policy and the enforcement of Public Spaces Protection Orders as officers may be called elsewhere and unable to support locally.				reports. Develop communication messages (including to all Cllrs) in event of NSO deployment.			This issue will be picked up in planning around monitoring community tension and Brexit Working Group.	
					Resilience planning for incidents, civil unrest and transport / supply disruptions	Croydon Resilience Forum (Kelly Jack)	Q4 2019/20 Qs 1-3 2020/21	Response plans are in place for a number of areas – these are standing plans, not Brexit-specific.  Disruption at ports expected to last for 6 months	Nothing further
<b>Regulatory services</b>									
Brexit results in changes to regulations but guidance/info is unclear, late and causes confusion	Increased demand on regulatory services  Confusion regarding existing and implemented regulations	4	4	16	Develop plan to manage increase in export health certificates	Environmental Health (Steve Iles)	Procedure in place by 01/04/2019	This applies to the export of Products of Animal Origin (POAO) – an export certificate will be required if we leave the EU without a deal and the UK is then deemed to be a ‘third country’.	A procedure for processing export licence applications, and a relevant fee structure, is required and is in the process of being readied.
					Monitor advice regarding food and consumer items risks	Trading Standards / Environmental Health (Steve Iles)	Website updated by 01/04/2019	No change in risk profile expected in short term. We will be using guidance issued by the Food Standards Agency and will include links to their website on our website. Long term – changes may be required but will be led by the Food Standards Agency.	Continued monitoring
					Review Department of Environment, Food and Rural Affairs guidance to ensure correct advice provided to businesses	Environmental Health (Steve Iles)		No change. Any questions on guidance: <a href="mailto:defra.helpline@defra.gsi.gov.uk">defra.helpline@defra.gsi.gov.uk</a>	Continued monitoring of central government communications for Defra guidance
<b>Business Continuity</b>									

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Supply chain challenges/delays	<p>Shortages of fuel. Council may need to decide on which individuals and groups should get priority for accessing fuel</p> <p>Issues of food and medicine shortages if supply chains are disrupted. This will impact hospitals and care homes.</p> <p>Vulnerable groups such as the elderly and children will be most at risk as unable to deliver statutory services.</p> <p>Workforce resilience impacted by supply chain failure</p>	5	4	20	Ensure business continuity plans are updated to consider Brexit implications, including supply chain shortages and provider failure	Resilience Team (Kelly Jack)	February 2019	Business Continuity plan templates will not be amended, however a questionnaire has been sent to Heads of Services to promote consideration of Brexit implications and a prompt to update plans generally.	Services have been reminded to incorporate Brexit implications into their service plans. Communications across the council to ensure all teams are aware of the impacts of Brexit and the need to prepare will continue.
					Attend London Brexit Contingency Planning Group	Resilience Team (Kelly Jack)	First meeting took place on the 30 <sup>th</sup> January 2019.	<p>Feedback from the London Resilience Group Brexit update for resilience forum chairs:</p> <ul style="list-style-type: none"> <li>- Limited new information provided. General risks, similar to those being discussed in Croydon were discussed.</li> <li>- National &amp; regional planning continues with limited information shared directly.</li> <li>- Energy/ water supply: low risk of disruption</li> <li>- Food supply: security should be fine, choice might be affected or some delays to deliveries.</li> <li>- Waste: concerns for regional export of waste.</li> </ul> <p>Regional reporting will remain in single agencies and not as a collective multi-agency report on behalf of the Croydon Resilience Forum.</p>	ongoing
					<p>Croydon Local Resilience Forum to develop response plans for:</p> <ul style="list-style-type: none"> <li>• Animal disease</li> <li>• Fuel Supply shortages</li> <li>• Civil disturbance</li> </ul> <p>Food supply issues</p>	Resilience Team (Kelly Jack)	Feb 2019	<p>Plans are in place for the response to these incidents:</p> <ul style="list-style-type: none"> <li>- Animal Disease</li> <li>- Fuel disruption (visits have been made with the MPS to Croydon's designated filling station, further traffic management mapping is being done to enhance arrangements).</li> <li>- Civil disturbance: existing response plans apply.</li> <li>- Food supply issues: specific plans will not be made for this until further information is known/ understood.</li> </ul> <p>MPS BCU South East have (regional) policing plans in place. Direction will be sought from them if any disorder issues arise.</p>	Plans are in place
					Maintain links with Croydon Clinical Commissioning Group	Gavin Handford	Ongoing	- This Action Plan was originally shared with key strategic partners including health services and the Police in April 2019. We have since shared this	The Council has received Brexit prep updates from the

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					(CCG), Croydon Health Services NHS Trust (CHS)/ and the Police regarding their Brexit planning.			action plan again in September 2019 to show updates and emerging concerns.  The Council received comprehensive Brexit action plans from Croydon CCG, CHS and the police in August 2019.	Police, CHS and Croydon CCG as of August 2019. Communications will continue with all of our key strategic partners to ensure we are working together to mitigate the impacts of Brexit.
<b>Adults</b>									
Supply chain/Workforce issues make it difficult for the Council to provide critical care services to vulnerable individuals	Shortage in medicines, food and staff will impact adult social care providers and their users.	4	4	16	Develop contingency plans to ensure adults services will continue to be del	Public Health/Adult Social Care (Rachel Flowers/Caroline Baxter)	Until 31 <sup>st</sup> October 2019	A service contingency plan has been put together and is being continually updated in respect of potential service/provider failure due to the implications of Brexit. Adults is factoring in potential for staff, medication, food and transport concerns to mitigate emerging challenges.  Conversations and meetings with providers have taken place. They have not as yet seen any impact but are aware of who they can contact in respect of issues if they develop.	Ongoing
					Continually monitor central government communication channels to identify emerging Brexit impacts/guidance.	Adult Social Care/ Gateway Services (Caroline Baxter/Jayne Raper)	Ongoing	Adults' staff are aware of the need to monitor central government communications concerning Brexit.  A script is being crafted for staff to provide signposting to the information available on the Council's Website and Gov.uk for example	Ongoing
					Identify clients who are EU nationals and offer support to enable their EU Settlement Scheme application.	Adult Social Care/ Gateway Services (Caroline Baxter/Jayne Raper)	Up until closer of EU Settlement Scheme (latest June 2021)	This work is being done by the Business Systems team (CDS) and we have cascaded information via the Adult Social Care Team Managers around identification and advice as to what is required to achieve Settled/pre-settled Status and how we as a service/council can support.	Signposting and advice/support offer to continue for foreseeable future
					Ensure guidance on Brexit is cascaded to Council staff who are EU nationals. Ensure they know where to access support in relation to the EU Settlement Scheme.	Adult Social Care/ Gateway Services (Caroline Baxter/Jayne Raper)	Up until closer of EU Settlement Scheme (latest June 2021)	Team managers have cascaded advice and the offer of assistance to staff who are EU nationals in respect of applying for Settled Status.  Senior staff will be monitoring this and from the 9 <sup>th</sup> September there will be a weekly information updates via the Monday Message (Departmental Staff Bulletin).	Action complete – though new starters will need to be informed and reminders will need to go out.