

**West Dunbartonshire Council**  
**EU- Exit Assurance Action Plan – January 2020 Appendix 2**

Background: The themes of Issues/Risks identified below are based on the Scottish Planning assumptions. This document will remain live, and regularly updated throughout the response to any “No Deal” EU Exit, or delay of Article 50.

<b>Broad Risk</b>	<b>Action</b>	<b>Comments – Martin Keeley – Updated - Environmental Health Manager 23<sup>rd</sup> October 2019</b>
<p>Congestion at sea ports &amp; airports through delayed processes with potential impacts to:</p> <ul style="list-style-type: none"> <li>- Ports / Airports</li> <li>- Warehouse distribution centres</li> <li>- Motorway / Trunk Road network</li> <li>- Rail Network</li> </ul>	<p>Potential requirement / funding case to Scottish Government has been submitted for a minimum of 2 and a maximum of 4FTE officers in Environmental Health, this will depend on the need to engage in food import controls and / or enhanced export certification work to support the Scottish food sector.</p> <p>Requirement to directly deliver controls or the requirement to assist other food authorities in these matters (Regional / National Hubs for food export certification or port health controls for food import)</p> <p>Signposting of Scottish Government EU Exit website providing information on</p>	<p>WDC EH Manager is linked in through the Scottish Food Enforcement Liaison Committee to work with groups looking at EU Exit implications. While the position is being led nationally, by DEFRA, they are supportive of the work of the Scottish Food Enforcement Liaison Committee who has developed a deliverable risk based system (resource dependent). WDC EH Manager is linked to the various groups involved (including APHA, Scottish Government, Food Standards Scotland and Food Authorities (Local Authorities)</p> <p>Scottish Government is aware of potential bottlenecks in the delivery of the system, with Local Authorities potentially having to resource hubs for delivery of the system. £8M of funding has been identified for Scottish LAs to fund Export Health Certification (EHC) activities in a no deal scenario. LAs have been invited to bid for funds to resource Export Health Certification. WDC have bid for funds for Environmental Health resource (submitted on the 24<sup>th</sup> October)</p> <p>Through the funding request from CoSLA. WDC have proposed to re-establish EHO trainee positions. The funding, potentially ring-fenced would support this request</p> <p>The Scottish position of certification based on risk for Products of Animal Origin (POAO) has been accepted and adopted as the UK position. As of 23/10/2019, DEFRA issued the technical guidance for the risk based approach for EU exports (exports from the UK to the EU) in the event of a no deal scenario</p>

Broad Risk	Action	Comments – Martin Keeley – Updated - Environmental Health Manager 23 <sup>rd</sup> October 2019
	passports / personal travel <a href="https://www.gov.scot/brexit/">https://www.gov.scot/brexit/</a>	<p>Groups are working on the basis of a Reasonable Worst Case Scenario (RWCS). In such a scenario, the national demand for food export Health Certification is predicted to exceed capacity. Food shortages are likely to impact on all businesses. Within the Council work has been undertaken to minimise any potential disruption</p> <p>Capacity for import does not exist in Scotland and is limited UK wide. Discussions at a UK level and Scottish level are ongoing to determine the level of need and the development of capacity to meet such need.</p> <p>The likelihood of WDC becoming a port authority for food is unknown. The demand for an establishment of an export hub(s) in WDC also unknown.</p> <p>Information on DPEs and BIPs related to the EU are given here along with a Brexit reference.  <a href="https://ec.europa.eu/food/safety/official_controls/legislation/imports/animal_en">https://ec.europa.eu/food/safety/official_controls/legislation/imports/animal_en</a>  <a href="https://ec.europa.eu/food/safety/official_controls/legislation/imports/non-animal_en">https://ec.europa.eu/food/safety/official_controls/legislation/imports/non-animal_en</a>  <a href="https://ec.europa.eu/food/animals/vet-border-control/bip_en">https://ec.europa.eu/food/animals/vet-border-control/bip_en</a></p> <p>Network Rail have produced a Risk Management Document, along with other EU Exit materials; providing reassurance that measures will be taken to ensure network operation.</p>

**Disruption to Service**

<b>Broad Risk</b>	<b>WD Impact</b>	<b>Action</b>	<b>Comments Jen Watt Civil Contingencies Officer - Updated 24<sup>th</sup> October 2019</b>
Reduction, delay or stoppage in supply of medicines and medical supplies.			Please see bespoke HSCP Action Plan.
Reduction, delay or stoppage in movement, holding of animals and supply of veterinary medicines / supplies	-Concerns with regards to livestock welfare and disposal	Continued engagement with APHA and DEFRA	This has been deemed a risk. APHA and DEFRA look after the animal movements and it's under vet control for medicines etc. for farm animals
Reduction, delay or stoppage in supplies of other consumables	<ul style="list-style-type: none"> <li>- Impacts on capital or infrastructure projects, e.g. new school at Renton</li> <li>- Impacts on other services provided through other nations, e.g. software</li> <li>- Impact to Chemicals (Leisure Trust)</li> </ul>	<p>Services to consider supply and projects in line with significant assurance work carried out by Procurement. Supply, etc which is continually monitored.</p> <p>Continued engagement with Facilities Manager re school and care home provisions.  <b>Refer to Broad Risk:</b> Certain types of fresh food may decrease /prices of certain foods many increase</p> <p>Check on existing and future contracts in terms of where the risk lies. (service led)</p>	<p>Considerable work carried out by Scotland Excel to provide assurances. The Corporate Procurement Unit (CPU) sent out a supplier / provider questionnaire however of the suppliers / providers that did respond, those responses were generic. The CPU also sent out questionnaires to the Council's service areas to ascertain contingency plans should a supplier / provider not meet the specification / delivery due to Brexit</p> <p>REG and Legal to check on existing and future contracts in terms of where the risk lies.            Scottish Water / UK Water Suppliers have provided written assurance that their supply will be maintained</p>

**Disruption to Service**

Broad Risk	WD Impact	Action	Comments Jen Watt Civil Contingencies Officer - Updated 24 <sup>th</sup> October 2019
	<p>- Polyaluminium Chloride (PAC) – supplier: Brenntag UK</p> <p>-Calcium Hypochlorite (HTH) – supplier: Brenntag UK</p> <p>-Carbon Dioxide – supplier: Air Products UK</p>	<p>WD Leisure continuing to monitor</p> <p>WD Leisure continuing to monitor</p> <p>WD Leisure continuing to monitor</p>	<p>There is currently a maintenance outage at the Runcorn plant causing a shortage of hydrochloric acid. This is one of the main components of PAC. It has been advised that Scottish Water will be prioritised if shortages become critical. However, PAC and other components that make up the product are all produced in the UK; therefore EU-Exit will not be an issue</p> <p>HTH is imported from the USA and this could be affected by EU-Exit. WD Leisure has stocked up a 3 month supply. HTH will be transported in shipping containers with electronic paperwork send in advance to minimise delays</p> <p>This is being reported as ‘business as usual’. WD Leisure has supplies of sodium bisulphate as an alternative to CO2 for pH control</p>
<p>Impact upon low impact groups as a result of lack of supply of foods or price increase of fuel, food, etc.</p>	<ul style="list-style-type: none"> <li>- Potential welfare requirements (including Welfare Fund) enhanced</li> <li>- Potential impacts upon foodbanks etc.</li> </ul>	<p>Engagement with Working 4U/Communities Teams to gauge how foodbanks may be affected / can be linked in with</p> <p>Consideration on messaging with regards to the type of supplies foodbanks need</p> <p>Consider the level of social welfare funding available</p>	<p>Risk of additional costs due to welfare needs of the public. WDC has also agreed to provide funding to support two local foodbank charities, though not necessarily as a result of the potential impact of EU- Exit. The food banks have built strong a relationship with the Council. As such, this will enable regular monitoring of potential impacts caused by a No Deal Exit and allow concerns to be raised using appropriate and recognised channels</p> <p>Campaign to encourage donations to West Dunbartonshire Community Foodbanks is ongoing. Activity on the Intranet to encourage officers to donate &amp; highlighting thanks for those who have donated to keep the project relevant</p>

**Disruption to Service**

Broad Risk	WD Impact	Action	Comments Jen Watt Civil Contingencies Officer - Updated 24 <sup>th</sup> October 2019
		<p>against potential need (W4U - include consideration of fuel poverty)</p> <p>Continued engagement with local food banks</p>	<p>Foodbanks currently have <b>sufficient</b> stock supplies and money to purchase stock if it was to run low. They have highlighted that their social media campaigns have typically led to upsurge in donations, which continues to be the case. The group has contact with the Communities Team with regards community budgeting grants</p> <p>Working 4U liaise with local organisations (foodbanks and third sector organisations) providing access to low cost cafes and support for 'food on a budget' for people with limited resources. The aim is to work with key organisations to develop an action plan that will include action to:</p> <ul style="list-style-type: none"> <li>• Raise awareness of the need for services;</li> <li>• promote availability of food and services;</li> <li>• maintain/increase supplies of food and donations to the organisations (from individuals, local business, public and third sector organisations);</li> <li>• Support access to additional funds for the provision of food</li> </ul>
<p>Fuel Supply Disruption</p>	<ul style="list-style-type: none"> <li>- Potential requests for Council Resources</li> <li>- Potential impact on Council reserves</li> </ul>	<p>Roads / Transportation to consider ensuring Council reserves are at optimal levels and processes in the event of requests from partner agencies</p>	<p>Scottish Government planning assumptions suggests there will not be an impact on fuel levels, etc. Recent discussions with Energy Sector have provided reassurance in this area and confirmed that Scottish stocks are sufficient</p> <p>There will be <b>no provision</b> to stock pile fuel. WDC do not have the capacity to store any more fuel. Fuel delivery tankers bring in 8-10,000 litres per delivery as required</p> <p>WDC do not envisage any issue with fuel deliveries as supplies are sourced from creditable fuel suppliers</p> <p>As highlighted in the UK planning assumptions to date the only foreseen</p>

**Disruption to Service**

Broad Risk	WD Impact	Action	Comments Jen Watt Civil Contingencies Officer - Updated 24 <sup>th</sup> October 2019
			potential for disruption to fuel supplies is for London and South East England. This is being associated to traffic congestion & linked customer behaviours rather than supply shortages
Increased unemployment as a result of economic disruption	<ul style="list-style-type: none"> <li>- Greater number of people in receipt of benefits with additional knock-on demand for support services. Including welfare/debt advice, employability support and discretionary welfare payments</li> </ul>	<p>Working 4U will work with strategic partners to ensure information about access to services is widely available</p> <p>Continued review of services to ensure increasing areas of demand are addressed</p>	<p>Working 4U will coordinate efforts of service providers through joint working with strategic partners in:</p> <ul style="list-style-type: none"> <li>• The West Dunbartonshire Information and Advice Partnership</li> <li>• The local strategic employability group</li> </ul>
Certain types of fresh food may decrease /prices of certain foods many increase	<ul style="list-style-type: none"> <li>- Potential additional costs for services/that purchase/supply foods to increase by up to 20%</li> <li>- Impacts on food provision at schools, care homes, etc.</li> </ul>	<p><b>Short term:</b> Consider earmarking additional resource, or consider use of prudential reserve if required</p> <p><b>Long term:</b> Consider building in additional costs into the long term finance strategy based on evidence post- EU Exit</p>	<p>WDC 19-20 budget for supply of food to Education and HSCP is set. Risk of additional costs</p> <p>The risk of cost increases arising from EU-Exit has been advised to Council in the budget preparation reports since October 2018. The budget report advises that any price variations will be reported and that it is expected that the Council would manage such price variations should they arise through ongoing budgetary control and, if necessary, use of free reserves</p> <p>Facilities Services maintain a very limited stock of tinned and dried food that is maintained year round, in case of single premise emergencies – while this is not EU Exit specific, it could be utilised in the event of a localised issue being experienced</p>

**Disruption to Service**

Broad Risk	WD Impact	Action	Comments Jen Watt Civil Contingencies Officer - Updated 24 <sup>th</sup> October 2019
			<p>At this stage, and in line with Scottish Government and CoSLA advice, there is <b>no intention</b> to stock pile beyond this contingency as storage capacity as freezer space prohibits this. In addition, nursery and school meals are produced in line with national legislation which details nutrient requirements. Most meals are therefore produced using fresh fruit, vegetables and other produce which has an extremely limited shelf-life and is not suitable for stock-piling</p> <p>Additionally, there is a requirement by Scottish Government that in the event of a no deal EU-Exit authorities are required to continue to ensure compliance with national nutritional standards. This could require significant resource input and also sourcing of alternative products</p> <p>Without detailed knowledge on the nature of the final EU-Exit arrangements it is impossible to accurately identify the physical or financial impact other than to anticipate significant cost increases for food provisions and therefore increased expenditure in this area by the Council for the provision of nursery and school meals. This potential additional expenditure has been highlighted to CoSLA on our submission of their Brexit Cost template</p>

Broad Risk	WDC Impact(s)	Action	Comments Victoria Rogers, Strategic Lead People and Technology /Stella Kinloch, Section Head Transactional Services - Reviewed– 25 <sup>th</sup> October 2019
Disrupt in flow of personal data due to legal requirements affecting law enforcement / intelligence sharing between UK & EU	<ul style="list-style-type: none"> <li>- Delay in PVGs, significant impact on teaching &amp; care staff</li> <li>- SSSC registration requirements</li> </ul>	Seek information / assurance / guidance from Scottish Government	<p>Scottish Government Update in relation to PVGs is as follows:  “Disclosure Scotland currently uses arrangements under the Directive and Council Decision to request information from 12 Member States for nationals of those Member States to work in childcare positions in Scotland. If the UK should leave the EU without a deal then the arrangements will end</p> <p>In the short-term, recruiting organisations will have to make use of certificates of good conduct provided by the individual. Disclosure Scotland isn't involved in that process. PVG disclosure requests will rely on information held in UK records only, and will be handled in line with the 14-day service level target”</p> <p>The above remains current</p>

<b>Demonstrations &amp; Disorder</b>			
Broad Risk	WDC Impact(s)	Action	Comments
Increase in protests in relation to: <ul style="list-style-type: none"> <li>- EU Exit</li> <li>- Scottish Independence</li> <li>- Irish / Northern Irish tension</li> </ul>	<ul style="list-style-type: none"> <li>- Increased license requests</li> <li>- Lack of Police / Partner resourcing to events</li> </ul>	Ensure awareness with relevant Leads / Officers for this	Police intelligence is currently that there is no activity planned

<b>Workforce</b>
------------------




Broad Risk	WDC Impact(s)	Action	Comments Victoria Rogers, Head of People and Technology/Stella Kinloch Section Head, Transactional Services – Updated- 9 <sup>th</sup> January 2020
Loss of staff – both highly skilled and lower skilled / entry level	<ul style="list-style-type: none"> <li>- Impact on Care for People. Agency Staff</li> <li>- Significant concern in Education regarding supply teachers, learning assistants, probationer allocations and officers with language skills</li> <li>- Potential impact on school transportation</li> <li>-Potential risk if contracts are subcontracted companies employing EU-nationals</li> </ul>	<p>Signposting of key information / support in relation to EU Workers within the Council <a href="https://www.gov.scot/brexit/">https://www.gov.scot/brexit/</a></p> <p>Education is revising processes with regards recruitment to reflect guidance and in relation to engagement with universities on earlier allocation of probationers</p> <p>Education to liaise with SPT &amp; taxi contractors</p>	<p>EU Nationals have already been identified within the organisation, letters have been issued. Managers have access to a Right to Work report within HR21. A key element will be to offer continued engagement with all affected parties</p> <p>REG to consult with existing contractors to seek assurance of continued project plans or the contingencies they have in place</p> <p>Planning for Settled Status assistance clinics are available within HR Connect to access online government systems where staff groups require further assistance, particularly those with limited PC literacy</p> <p>WDC HR has identified 31 employees with contractual obligation whose origin is EU or EEA</p> <p>The current position for employees is to apply for settled or pre-settled status by 30 June 2021. However, if the UK leaves without a deal this date is brought forward to 31 Dec 2020. All employees and line managers have been advised of the requirement and process to apply</p> <p>A full review of all employee roles and impact on each service area has been undertaken and there is a <b>low risk</b> to service delivery as there are no unique or difficult to fill positions identified, nor one single service impacted significantly</p> <p>The ability to identify individuals and line managers is readily available to HR and full individual support can be offered in the event of deadlines changing. HR Connect Section Head continues to monitor for any change notifications.</p> <p>Plans to review and advise employees is set for early 2020 providing employees with a year to conclude the application process for the earlier of</p>

Workforce			
Broad Risk	WDC Impact(s)	Action	Comments
			<p><b>Victoria Rogers, Head of People and Technology/Stella Kinloch Section Head, Transactional Services – Updated- 9<sup>th</sup> January 2020</b></p> <p>the 2 dates, with continuous monitoring by HR through this period</p> <p><b>Education</b> – School taxis and SPT will be addressed by procurement as all contracts are arranged via the Procurement route.</p>

Other Considerations			
Broad Risk	WDC Impact(s)	Action	Comments <b>Stephen West – Updated Revenue Spend, December 2019</b>
<p>EU Funds / Grants</p> <p>Impact on the European Structural Fund</p>	<p>- Ongoing projects, planned projects or staffing that are reliant on EU funding, either directly or indirectly through the Scottish Government</p> <p>- Impact on outstanding allocations of structural funding committed by Managing Authorities under the 2014-2020 programmes</p>	<p>Scottish Government has provided written reassurance that ESF will be continued in current form until 2023</p> <p>The UK Govt has stated that under a 'NO-deal Brexit', HM Treasury will honour the outstanding allocation</p>	<p>Assurance has been provided by the Scottish Government and circulated to Resilience Group. ESF, ERDF &amp; ETC projects signed by end of 2020 are covered by a UK Guarantee - <a href="https://www.gov.uk/government/news/funding-from-eu-programmes-guaranteed-until-the-end-of-2020">https://www.gov.uk/government/news/funding-from-eu-programmes-guaranteed-until-the-end-of-2020</a></p> <p>2023 commitments remains in place and will be funded by the UK Govt. There is uncertainty whether this will cover all European spend</p> <p>Hilary Pearce Head of European Structural Funds and State Aid Division is fully engaging with other Managing Authority heads across the UK and in relevant UKG departments to ensure her and her team are kept up to date with developments</p> <p>Additionally – In the expectation of the UK's exit from the EU. The European Commission (EC) has issued two regulations that would allow the UK to remain part of the European Development Fund and European Social Fund Programmes. The first regulation allows the UK to stay within the existing programmes until Dec 2019; the second regulation – which is currently in draft-, would extend this offer to the end of Dec 2020. Both are dependent on</p>

Other Considerations			
Broad Risk	WDC Impact(s)	Action	Comments <b>Stephen West – Updated Revenue Spend, December 2019</b>
			the UK paying its share of the EU budget during 2019 and 2020 respectively
Other Financial Considerations	<p>-Impact of any fluctuations in the currency rate to expenditure.</p> <p>-Impact on future economic growth</p> <p>Impact on any regeneration projects and plans</p>	<p>Ensure council services purchasing though currency exchange remain within budget</p>	<p><u>Revenue spend</u> Our transactions are in UK Sterling Pounds (£) but there may be an increase in the cost due to market fluctuations. WDC are subjected annually to an approx. 3% increase for many systems. An expected increase is built into the budget each year, however due to exchange rate fluctuations there is a lack of certainty and this can lead to an overspend. This risk of exchange rate fluctuation is higher due to Brexit and would likely to be more volatile with a “no deal” Brexit. See comments above re reports to Council on the budget-setting process and approach to managing this financial risk.</p> <p><u>Capital spend (ICT)</u> Again WDC transactions are in £ and there may be an increase in the cost if the market does fluctuate. For capital projects, WDC approach is to adjust the volumes to remain within budget as device prices change every 6 months on the frameworks anyway. WDC have in the past asked for capital funding approval to be accelerated from future years where we have an urgent requirement and have no budget left. Costs will be monitored and any variations reported through normal budgetary control processes, which highlight reasons for cost increases</p>
Expenditure	<p>- Impact of increasing inflation – costs to the council (excluding food): e.g. Energy costs; care agency costs</p>	<p>Monitor increases in costs of those identified as high risk/ high volume</p> <p>Monitor overall position through budgetary control process</p> <p><b>SHORT TERM:</b> consider earmarking additional resources at the year-end for</p>	<p>Energy bought in advance – short term risk minimal; however could have a longer term impact</p> <p>The risk of cost increases arising from Brexit has been advised to Council in budget preparation reports since October 2018. The final budget report advises that any price variations will be reported and that it was expected that Council would manage such price variations should they arise through ongoing budgetary control and, if necessary, use of free reserves</p>

Other Considerations			
Broad Risk	WDC Impact(s)	Action	Comments Stephen West – Updated Revenue Spend, December 2019
		<p>the risk; or consider use of prudential reserve if required short term.</p> <p><b>LONGER TERM:</b> consider building-in additional costs into the long term finance strategy based on evidence post-Brexit</p>	
Funding Support	- Impact to Council of chancellor revisiting the budget and affecting local government funding settlements	Monitor ongoing Brexit discussions and potential impact on the councils finances & the wider implications of the Scottish economy	
Capital Receipts	- Capital Receipts do not materialise or are lower than anticipated	<p>Longer term vision on capital programme for both income and expenditure levels</p> <p>Regular Strategic Asset Management Group updates feeding through to the capital budgetary control report (to both Council and CMT)</p> <p>Capital Disposal Strategy with longer term vision to allow movement in the assets due sold and timing of those assets</p> <p>Capital programme being monitored by CMT, Council and Committees on a regular</p>	

Other Considerations			
Broad Risk	WDC Impact(s)	Action	Comments Stephen West – Updated Revenue Spend, December 2019
		<p>basis</p> <p>Early identification of possible issues to allow action to reduce spend or identify further surplus assets for possible disposal to minimise shortfall.</p>	
Broad Risk	WD Impact(s)	Action	Comments – Michael McGuinness, Economic Development Manager - Updated – 5 <sup>th</sup> September 2019
Provision of information to Local businesses	- A review of the potential impacts suggests they have either been covered off already, or that services will not be affected. For example, more or less use of the libraries will not have any significant risk to the service.	Communications and the web team need to be ready to respond proactively to any messages that the wider Council needs to issue following Brexit	<p>The web team have already uploaded information on the Council internet site sign posting local businesses to the guidance supplied by the Scottish Government</p> <p> PDF</p> <p>Prepare for Brexit core messages - upd:</p> <p>A recent document produced with a number of key public stakeholders provides useful information in regards to Business engagements from Public bodies</p>

Business Continuity			
Broad risk	WD Impact(s)	Action	Comments – Jen Watt, Civil Contingencies Officer - Updated 19 <sup>th</sup> September 2019
Assess impact of no deal EU- Exit on Business Continuity Plans	<p>Potential disruption to services</p> <ul style="list-style-type: none"> <li>- Food</li> <li>- Medicines</li> <li>- Staff</li> </ul>	WDC have recently undertaken a full review of all Business Continuity Arrangements	<p>Business Continuity planning remains an operational focus. Any changes pre/post EU-Exit will be reflected into the respective Business Continuity Plan</p> <p>The Multi-Agency Coordination Centre (MACC) will now only activated if there is any indication of unrest</p>

<b>Business Continuity</b>			
<b>Broad risk</b>	<b>WD Impact(s)</b>	<b>Action</b>	<b>Comments – Jen Watt, Civil Contingencies Officer - Updated 19<sup>th</sup> September 2019</b>
		Reporting into the Multi Agency Coordination Centre (MACC) (when active)  Reporting to CoSLA and Scottish Government  Dialling into teleconferences	CoSLA and Scottish Government continues to request information from WD with regards to funding concerns and preparedness. This information helps adequately inform CoSLA and Scottish Government of Council preparations ahead of a potential no deal EU-Exit  In addition to the above, the Civil Contingencies Officer/EU Exit Tactical Leads are dialling in every two weeks to CoSLA teleconferences to discuss any arising issues and requests from Scottish Government and CoSLA

Live Document