

London Resilience Partnership Report: Brexit Contingency Planning

1. Introduction

- 1.1. This report details the findings to date of the London Resilience Partnership Brexit Contingency Planning Project. The findings are based on the outcomes of the London Resilience Partnership Strategic Summit on Brexit held on 17th September 2018 and subsequent research undertaken with Partnership organisations.
- 1.2. The Summit provided a good opportunity for the London Resilience Partnership to assess its understanding to date of the potential implications of a no-deal Brexit on the resilience of London. The findings highlighted in this report form the basis for packages of work that are now being taken forward to enable London to be resilient against the potential risks of Brexit.

2. High-level findings

Partnership engagement

- 2.1. Three key factors significantly influenced the ability of partners to effectively engage in the summit and need to be addressed to enable the Partnership to put in place effective contingency plans for Brexit.
 - 2.1.1. Some Partnership organisations and sectors have been undertaking contingency planning since the referendum result and are delivering mature programmes of work. In contrast, for many the resilience summit itself was a first step or very early phase in their contingency planning.
 - 2.1.2. There is a significant gap in information and planning assumptions necessary to inform detailed contingency planning. Partners will require further information from central government about the residual risks (i.e. risks once mitigations and contingencies planned by central government have been taken into account) and subsequent planning assumptions (e.g. the potential magnitude and length of disruption to the import of goods at the border) going forward. The [technical notices](#) and details of the [government's preparations](#) published by central government, while helpful for some sector specific issues, do not alone contain sufficient information to inform contingency planning.
 - 2.1.3. It was clear from informal discussions with some representatives of partner organisations and sectors, both in the run up to, and during the summit, that many felt unable to speak openly. In some cases this related to commercial sensitivities and/or non-disclosure agreements, and in others because the organisation has a national remit for their Brexit preparedness and local representatives were limited in how they could engage with the London Resilience Partnership.

- 2.2. The need to ensure absolute political impartiality in the work to develop contingency plans for Brexit, and to de-weaponise information was noted at the summit. This is believed to be reflective of a general concern that information prepared by professional bodies is often appropriated for political use in pro and anti Brexit campaigning.

Information availability

- 2.3. There is a significant gap in information required to inform contingency planning for Brexit. Some of this information will be produced as partners and the Partnership as a whole further develop their contingency planning. For example, comprehensive assessments of the implications for critical supply chains and personnel need to be conducted by Partnership organisations where they have not yet been fully considered. However, delegates overwhelmingly felt that further information will need to be provided by central government to inform their own local assessments going forward.
- 2.4. Central government has provided some limited information and has given a commitment to provide further information and support to local planning. Without further detailed information and its timely dissemination to all agencies with a requirement to plan for a no-deal scenario, it will not enable further focussed local planning.
- 2.5. Following approval of this report, it is proposed that a letter on behalf of the LRF will be sent to central government to formalise a request for further specific information and planning assumptions to inform London's preparedness for Brexit. Regular engagement with MHCLG is in place and will continue throughout the planning process.

Contingency planning and emergency response capability

- 2.6. Partners are generally confident in their ability to implement adequate contingency plans for Brexit, and in the Partnership's capability to respond to specific risks such as increased protest activity and the potential for civil unrest. These issues are considered to be within the Partnership's extant emergency response capabilities.
- 2.7. There is a gap in information about potential risks that may require the Partnership to respond to an emergency, including a need to develop detailed planning assumptions. E.g. Residual risk (following central government mitigation) of disruption to food supplies, energy supplies, fuel supplies, and borders (people and goods). The information received in the technical notices to date does not indicate significant concerns in the areas of energy and fuel supplies, but there remains uncertainty about the implications for food supplies and border disruption. The Partnership has standing capabilities for some of these risks (e.g. fuel and energy disruption), but without further information about the risks posed, will be hampered in its ability to undertake further contingency planning.

Impact of a no-deal Brexit on resilience

2.8. Sector based syndicate groups were asked to provide an initial assessment of the potential implications on the resilience of their sector of a worst case scenario no-deal Brexit (with no transition/implementation period from 29th March 2019) against a scale ranging from significant positive impact to significant negative impact. Sectors¹ responded as follows:

- Health sector: Significant negative impact on resilience
- Local authorities: Negative to significant negative impact on resilience
- Emergency services: Negative impact on resilience
- Business: Slight negative to negative impact on resilience
- Transport and utilities: Negative to significant negative impact on resilience
- Environment, voluntary, faith: Slight negative to negative impact on resilience

Priority areas for further contingency planning

2.9. Sectors and organisations should undertake comprehensive assessments of potential supply chain disruption on critical services in the event of significant disruption to freight transiting through ports of entry to the UK in Kent and elsewhere, where they have not already done so. As an indicative planning assumption, based on multiple sources, the London Resilience Group recommends at this point in time that the Partnership prepares on the basis that disruption at ports may occur for a number of weeks, possibly even months. Due to market forces and uncertainty about the arrangements that will be put in place on the European mainland we can give no certainty about the length of these disruptions.

2.10. The London Resilience Partnership should undertake further assessment of the potential consequences of disruption to people and goods at borders within London including Heathrow and City airports, St. Pancras International Station and the Port of London.

2.11. The London Resilience Partnership should further consider the implications for communities and community tension and develop plans for a joint approach to supporting community cohesion.

2.12. The London Resilience Partnership should review extant capabilities for dealing with protests and civil unrest against an evolving assessment of this risk.

2.13. The London Resilience Partnership should share information about the approach being taken to provide guidance and support to workforces.

2.14. The London Resilience Partnership should work with critical sectors including health, utilities, transport, fuel and food to improve understanding of the potential implications of a short-notice no-deal Brexit and identify any requirements for the partnership to develop contingency plans.

¹ Delegates were seated in syndicate groups. The sectors identified in these results are indicative and the syndicate group may have included other organisations.

Policy issues outside the scope of contingency planning for a no-deal Brexit

- 2.15. A range of issues were discussed at the summit which are considered to be longer-term policy issues rather than within the purview of contingency planning for a short-notice no-deal Brexit. Nonetheless they were noted as significant concerns which may impact on the resilience of London, organisations and sectors over time.
- 2.15.1. Potential for economic decline and/or a rise in costs, and the implications for individuals, communities and public services (potential increase in demand for services versus a reduction in resources).
- 2.15.2. Impact on capital programmes as a result of changes to the economic landscape such as a down-turn in revenue, access to EU grant funding, downgrading of credit ratings increasing the cost of borrowing.
- 2.15.3. Workforce availability and implications for critical sectors with a current dependence on non-British EU nationals.

3. Recommendations and next steps

- 3.1. The London Resilience Forum should determine further contingency planning requirements for Brexit. The London Resilience Group proposes the following actions based on the findings of this report.
- 3.1.1. **October 2018** Maintain a bespoke Partnership project board for Brexit preparedness. The London Resilience Programme Board agreed (19th September 2018) to a regular programme of Partnership meetings to oversee multi-agency preparedness for Brexit. Monthly meetings will be held from October 2018. This will provide a mechanism for information sharing on Brexit risks, issues and preparedness.
- 3.1.2. **October 2018** Undertake further research to clarify planning assumptions, to be sourced from within the Partnership and through engagement with central government and other national and regional representative bodies as required.
- 3.1.3. **November 2018** Develop a London risk assessment for Brexit. This is expected to evolve over time from November 2018 to March 2019 as further clarity emerges from the planning process.
- 3.1.4. **November 2018 to March 2019** Develop bespoke contingency plans, if required, to address identified risks for which extant capabilities do not exist or need to be adjusted for the context of Brexit.

- 3.1.5. **October / November 2018** Develop and maintain a mechanism to provide assurance of Partnership preparedness for Brexit to include:
- 3.1.5.1. Business continuity - ability to maintain essential services (with support from partner organisations if required).
 - 3.1.5.2. Emergency response capability - ability to deploy Partnership capabilities to respond to incidents or emergencies should they arise (e.g. protest, civil unrest, fuel, energy (for all of which there are extant capabilities), food supply or border disruption (no extant Partnership capabilities²).
- 3.1.6. **December 2018 / January 2019** Confirm strategic coordination arrangements (based on London's [Strategic Coordination Protocol](#)) for the period preceding and following 29th March 2019 if deemed to be required. As an indicative planning assumption, based on multiple sources, the London Resilience Group recommends at this point in time that the Partnership prepares on the basis that strategic coordination arrangements may be required for a number of weeks and possibly months to oversee the response to the potential disruptive impacts of a worst case scenario short-notice no-deal Brexit.
- 3.2. London Resilience Forum Chair and the London Resilience Group to maintain regular engagement with central government throughout the planning process.

Annexes

Annex A: Background

Annex B: Approach and alignment with London Resilience Partnership Strategy

London Resilience Group, October 2018

² Single sector and local capabilities do exist but there are no documented London Resilience Partnership capabilities.

Annex A: Background

1. In July 2018 the Mayor of London asked the London Resilience Forum (LRF) to:
 - 1.1. Establish the impact of a no-deal Brexit on critical areas such as access to medicines, energy and food, as well as the ability to maintain emergency care, law and order.
 - 1.2. Assesses London's resilience needs in the instance of a no-deal and deal scenario.
 - 1.3. Determine what planning and preparation is taking place.
 - 1.4. Make recommendations on any planned or additional measures.
2. In parallel MHCLG is leading on engagement with LRFs on Brexit, working with other government departments, and the government has encouraged LRFs to undertake work on planning for the resilience impacts of Brexit. Guidance included:
 - 2.1. The work was intended to be reassuring while prompting people to take action.
 - 2.2. LRFs need to scope the risks and plan accordingly.
 - 2.3. Technical notices, when published, should be used to inform LRF planning.
 - 2.4. Planning should consider disruptive challenges and preparations for deal or no-deal scenarios.
3. Central government wrote to Local Resilience Forum (LRF) chairs in August 2018 to encourage LRFs to consider how the positions outlined in the Government's technical notices could impact on local plans. The specific technical notices set out what business and citizens would need to do in a 'no deal' scenario so they can prepare accordingly.
4. In response to the request by the Mayor of London and guidance from central government, the London Resilience Group convened a Brexit Contingency Planning Project Group comprised of members or appointees of the London Resilience Programme Board (LRPB). The Group met on 23rd August 2018 to confirm the project scope and to commence planning for a London Resilience Partnership Strategic Summit on Brexit Contingency Planning.
5. A London Resilience Partnership Strategic Summit was held on 17th September 2018. The aim of the event was to bring together strategic representatives of all sectors of the Partnership to consider the implications of Brexit for the resilience of London.

ANNEX B: Approach and alignment with London Resilience Partnership Strategy

1. The approach taken to the Brexit Contingency Planning Project has been to follow the same approach to consideration of other resilience risks and issues addressed by the London Resilience Partnership. This follows the Integrated Emergency Management cycle – a holistic approach to preventing and managing emergencies:

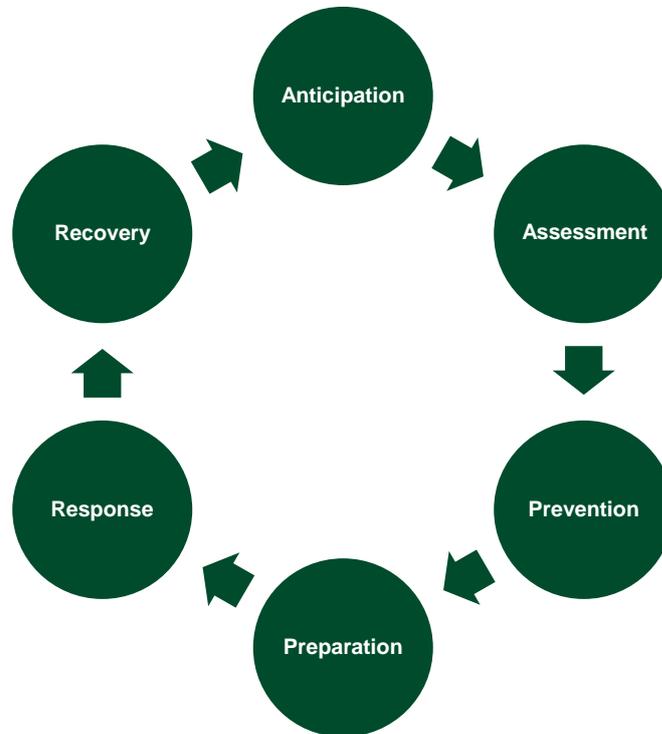


Figure: Integrated Emergency Management Cycle

2. The Brexit Summit and work undertaken to date has mainly focussed on the anticipation and assessment phase of the cycle. While further assessment and analysis is required, the report to the LRF on 18th October marked a milestone in transition towards prevention and preparation. The approach taken also aligns with the [London Resilience Partnership Strategy](#) represented in the following diagram.

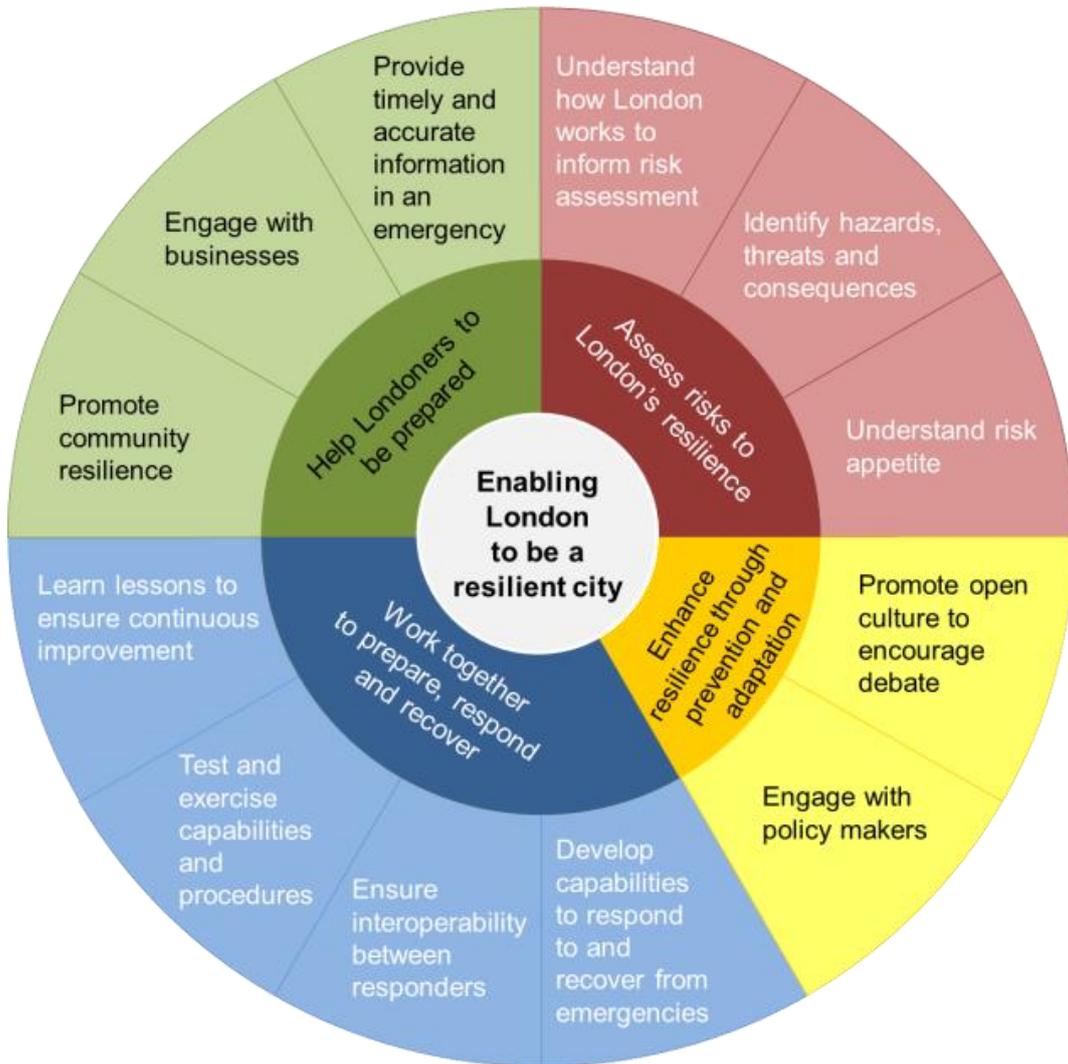


Figure: London Resilience Partnership Strategy