

Brexit preparedness: preparations for a ‘no deal’ EU exit

1. Background

On the 21 December, the Department of Health and Social Care shared a letter and guidance regarding Brexit preparations. Whilst ‘no deal’ exit is not the Government’s policy; the letter asks that organisations prepare for all scenarios. The guidance identified seven key areas of focus, which are:

- Supply of medicines and vaccines
- Supply of medical devices and clinical consumables
- Supply of non-clinical consumables, goods and services
- Workforce
- Reciprocal healthcare
- Clinical trials and clinical investigations
- Data sharing, processing and access.

NHS commissioning organisations were asked to assess and prepare their own plans, ensure information is cascaded effectively and our staff and stakeholders are aware of the preparations, as well as supporting the preparations of all providers. Across south east London we will seek to develop these plans collaboratively where possible as well as sharing information across our partners.

See Appendix 1 for presentation slides providing a summary of the guidance and the national approach to ‘no deal’ EU exit. The CCG continues to monitor and respond to further national guidance.

2. Structure

There is an NHS England oversight group at a London level and, at an organisational and STP level, there is Board level oversight and named leadership for this process.

The Brexit Oversight Group across the south east London Sustainability and Transformation Partnership (STP) is led jointly by Christina Windle (Director of Commissioning Operations for the South East London Alliance) and Fiona Connelly (Acting Strategic Director - Adults

and Health for Lambeth Council). They are joined by nominated executive leaders from each organisation within the STP.

Brexit oversight for Southwark CCG is led by Ross Graves as Managing Director of the CCG. Internally the CCG has established a Brexit Taskforce consisting of representatives from commissioning, medicines optimisation, continuing healthcare, assurance and governance to lead the CCG's response and actions. This group is responsible for overseeing any actions and communications carried out by the CCG or coordinated across the STP.

3. Risk assessment

The national 'no deal' EU exit guidance asked CCGs to undertake an assessment of the risks related to Brexit. CCGs were asked to consider each of the seven key areas of focus as well as a potential rise in demand and any local risks. The CCG has undertaken this exercise in coordination with other CCGs in south east London. In doing so the CCG has linked with Southwark Council to identify any risks local to the borough that are likely to impact on the CCG's work and vice versa.

The risk assessment has been reviewed by the CCG Senior Management Team and Integrated Governance and Performance Committee and has been shared with appropriate leads in Southwark Council and the STP.

The main risks identified are in the following areas:

- Preparations of provider organisations
- Potential rise in demand for healthcare
- Medicines and medical devices.

The CCG is working with health and social care organisations operating as part of the SEL STP to review lists of suppliers, and to carry out a coordinated communication to suppliers to seek assurance that there has been appropriate consideration of any impact of EU exit, and particularly the impact a 'no deal' exit might have on maintaining effective provision.

4. Business Continuity Planning

In response to the risks posed by a 'no deal' Brexit CCGs have been asked to review Business Continuity Plans (BCPs) against the identified risks and against scenarios developed by NHS England; to update their BCPs as required; and to exercise these BCPs.

Plans have also been exercised for the STP as a whole in a south east London event on 14 February 2019. This has resulted in the mobilisation of further working groups focusing on

mutual aid, assurance and workforce, with representation from providers and commissioners.

5. Next Steps

The CCG has a comprehensive and detailed action plan in preparation for a ‘no deal’ EU exit. The main next steps for the CCG are to:

- Mitigate against the risks identified in the risk assessment, where practicable
- Review the CCG’s Business Continuity Plan against the identified risks and against scenarios developed by NHS England, and update the BCP as required
- Seek assurance from our main providers of their preparations for a ‘no deal’ EU exit in conjunction with STP partners
- Continue to report progress and updates to the CCG Governing Body via the Integrated Governance and Performance Committee
- Monitor and follow further national updates and guidance
- Continue to work with partners in preparations both directly with organisational leads and through formal groups and committees.

Appendix 2: Brexit Preparations – National Guidance Summary for CCGs