

## **EU Exit Operational Readiness Guidance – Feb 2019 Update**

## **Actions for providers - Local EU Exit readiness preparations**

Action	Progres	ss/contingency	Status
Risk assessment and business continuity planning		Lead: Mark Stone	
Undertake an assessment of risks associated with EU Exit by the end of January 2019, covering, but not limited to:	This doc	ument aims to provide a full assessment of all ed risks.	At present no areas have been identified as high risk.
The seven key areas identified nationally and detailed below.	All areas	within DoH guidance have been assessed.	
<ul> <li>Potential increases in demand associated with wider impacts of a 'no deal' exit.</li> </ul>			No further updates
Locally specific risks resulting from EU Exit.			
Continue business continuity planning in line with your legal requirements under the Health and Social Care Act 2012, taking into account this guidance and working with wider system partners to ensure plans across the health and care	on direct	ument aims to develop a robust BC plan based input into all areas highlighted within this from the responsible Trust lead.	To be completed by week ending 25th January 2019.
system are robust. These organisational and system-wide plans should be completed at the latest by the end of January 2019.		outlining our planning arrangements will be d to Risk Committee and Trust Board at the end ry.	Updates provided by this report
Test existing business continuity and incident management plans against EU Exit risk assessment scenarios by the end of February to ensure these are fit for purpose.	_	ional multi-agency exercise is planned on 24th in Nottingham.	Arranged for 24th January.
			Multi-agency exercise

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		completed on Jan 24 <sup>th</sup> , attended by EPO and Deputy C.O.O. No significant risk areas identified for SFH.
		Resilience and Assurance Committee conducted table-top exercise on 14 <sup>th</sup> February, no significant issues or concerns raised, although there was no Procurement presence
Communications and escalation	Lead: Mark Stone	
Ensure your board is sighted on EU Exit preparation and take steps to raise awareness amongst staff.	This report will be issued to the Risk Committee and Board of Directors at the end of January 2019.  Communications strategy to be developed as required.	Reports under development, Comms strategy will be developed as required.
		Progressing as information and guidance is received.
Ensure Local Health Resilience Partnerships, Local Resilience Forums and Local A&E Delivery Boards are	Prior to the regional exercise on 24 <sup>th</sup> January there is a meeting of all health agencies to ensure we have a	Regional health economy to engage

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sighted on EU Exit preparation in your local health economy.	common approach and understanding of any risks.	with each other 24 <sup>th</sup> January.
		NHSE and CCG's taking lead in this area. SFH has been fully engaged with process and is sharing information as received.
Review capacity and activity plans, as well as annual leave, on call and command and control arrangements around the 29 March 2019, but at this point there is no ask to reduce capacity or activity around this time.	Will undertake review at end of February.	Under development.  No further updates
Be ready for further operational guidance from NHS England and Improvement as contingency planning work progresses.	Trust is aware and receptive to further guidance.	On-going.  No further updates
Confirm escalation routes for different types of issues potentially arising from or affected by EU Exit into the regional NHS EU Exit teams listed in this document.	This will be done via the Trust RAC and the Risk Committee.	On-going.  No further updates
Note your nominated regional NHS lead for EU Exit and their contact details.	Complete.	Complete.
their contact details.		Complete
Escalate any issues you have identified as having a potentially widespread impact immediately to your regional	Completed submissions – nothing identified.	Complete.
EU Exit team.		Complete
Confirm your organisation's Senior Responsible Officer for EU Exit preparation and identify them to your regional EU	Richard Mitchell – CE has been identified. Denise Smith, Deputy C.O.O and Chair of the Resilience Assurance	Under review.
Exit team as soon as possible. This role should be held by a board level member and will entail providing information	Committee to lead on identifying key staff to work as oversight team.	This may require

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returns to NHS England and Improvement, reporting emerging EU Exit-related problems, and ensuring your organisation has updated its business continuity plan to factor in all potential 'no deal' exit impacts. Organisations should also identify named staff to work in a team with the Senior Responsible Officer to support EU Exit preparation, implementation and incident response.			further executive input in order that a formal oversight group can start meeting regularly from early in March until such time as it is felt un-necessary. This could be several months
Reporting, assurance and information		Lead: Mark Stone	
Be aware that if additional reporting is required, NHS England and Improvement will provide further guidance on requirements. However, existing reporting from NHS organisations will be used to develop a baseline assessment of the EU Exit impact on the health and care system.	Noted.		Awaiting further guidance/instructions.  It is expected that further guidance will be received by the end of this week (22 <sup>nd</sup> Feb)
Note that regional NHS EU Exit teams will be in contact shortly to confirm your progress on these actions.	Noted.		Awaiting further guidance/instructions.  Expected by the end of Feb
For queries relating to specific topic areas in this guidance, please contact the relevant departmental mailboxes. Any immediate risks or concerns about provision of NHS service continuity should be escalated to the relevant regional NHS EU Exit mailbox.	Noted.		In hand.  Nothing at this stage to escalate
Supply of medicines and vaccines	1	Lead: Steve May	

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Follow the Secretary of State's message not to stockpile additional medicines beyond their business as usual stock levels. No clinician should write longer prescriptions for patients. The Department's UK-wide contingency plan for the continued supply of medicines and vaccines from the moment we leave the EU is being developed alongside pharmaceutical companies and other government departments.	We are totally in-line with this requirement and are not stockpiling medicines and continue to supply the standard quantities on prescriptions.	No issues.  Trust is compliant
Note that there is no need to contact suppliers of medicines directly.	Noted.	No issues.  Trust is compliant
Direct staff to promote messages of continuity and reassurance to people who use health and care services, including that they should not store additional medicines at home.	This will be directed from primary care.	No issues.  Trust is compliant
Note that Chief and Responsible Pharmacists are responsible for ensuring their organisation does not stockpile medicines unnecessarily. Any incidences involving the over-ordering of medicines will be investigated and followed up with the relevant Chief or Responsible Pharmacist directly.	Noted and not stockpiling.	No issues.  Trust is compliant
Note that the Department and NHS England and Improvement are developing arrangements to allow local and regional monitoring of stock levels of medicines.	Noted.	No issues.  No further updates
Be aware that UK-wide contingency plans for medicines supply are kept under review, and the Department will communicate further guidance as and when necessary.	Noted.	No issues.  No further updates
Continue to report current shortage issues and escalate queries for medicine supply issues unrelated to current shortages through existing regional communication	Noted and current channels will be used.	No issues.  No further updates

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channels.		
Regional pharmacists and emergency planning staff to: Meet at a local level to discuss and agree local contingency and collaboration arrangements. The Chief Pharmaceutical Officer will hold a meeting with the chairs of regional hospital and CCG Chief Pharmacist networks (and representatives of private hospital Chief Pharmacists) in January 2019 to help inform local plans.	As Chair of East Midlands Chief Pharmacists networ Steve May will meet at Department of Health on 29 <sup>th</sup> January. Any new guidance will be disseminated ac East Midlands.	actions will be
Supply of medical devices and clinical consumable	es Lead: Bob Truswell	
Note that there is no need for health and adult social care providers to stockpile additional medical devices and clinical consumables beyond business as usual stock levels. Officials in the Department will continually monitor the situation and if the situation changes, will provide further guidance by the end of January 2019.	Currently reviewing top up levels of critical stock line This is normal winter procedure. SFH have no intent of stockpiling. We have been assured that additional capacity building will happen at the centre.  Monitoring the situation jointly with NHS Supply Cha and awaiting further instructions.	Trust is compliant
Send queries about medical devices and clinical consumables provided by NHS Supply Chain to your usual contact. If you receive medical devices and clinical consumables from other suppliers, you should contact them directly with any queries as you would normally do.	Noted. Currently holding fortnightly meetings with NF Supply Chain representative, Ollie Booth, to stay up date on current issues	
Be aware that the contingency plan is kept under review, and the Department will communicate further guidance as and when necessary.	Noted - awaiting further guidance.	No issues.  Trusts asked to have more flexible goods receipting arrangements and

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			to plan for delays of 72 hours in normal supply routes. Procurement liaising with R & D colleagues
Send queries regarding medical devices and clinical consumables to mdcc-contingencyplanning@dhsc.gov.uk.	Noted.		No issues.
Supply of non-clinical consumables, goods and se	ervices	Lead: Bob Truswell	
Be aware that NHS Trust and Foundation Trust procurement leads have been asked to undertake internal reviews of purchased goods and services to understand any risks to operations if there is disruption in supply. This excludes goods and services that are being reviewed centrally, such as food, on which the Department has written to procurement leads previously.	November a further the list th	self-assessment completed and submitted on 30 er 2018. Feedback received states that roughly one hundred suppliers have now been added to at will be managed centrally. The risk to SFH remaining suppliers that will be managed locally	No issues.  No further updates
Continue commercial preparation for EU Exit as part of your usual resilience planning, addressing any risks and issues identified through your own risk assessments that need to be managed locally.	January.	I resilience table top exercise conducted on 4 Regional scenario planning / testing event d for 24 January. Procurement Team feeding via SFH Emergency Planning Officer.	No issues.  No further updates
Continue to update local business continuity plans to ensure continuity of supply in a 'no deal' scenario. Where appropriate, these plans should be developed in conjunction with your Local Health Resilience Partnership. All health organisations should be engaged in their relevant Local Health Resilience Partnership, which should inform Local Resilience Forum(s) of local EU Exit plans for health and care.	Action to take place following the scenario planning / testing event on 24 January.		In progress.  Procurement lead liaising daily with EPO who is engaged directly with LHRP
Be aware that the Department is conducting supply chain reviews across the health and care system, and work is in progress to identify risk areas specific to primary care.	Aware ar	nd noted.	No issues.

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			No further updates
Await further advice from the Department on what actions should be taken locally.	Noted.		No issues.
			Trusts asked to have more flexible goods receipting arrangements and to plan for delays of 72 hours in normal supply routes. Procurement liaising with R & D colleagues
Submit the results of their self-assessment on non-clinical consumables, goods and services to <a href="mailto:contractreview@dhsc.gov.uk">contractreview@dhsc.gov.uk</a> , if not done so already.	Completed on 30 November 2018.		Completed and feedback received.
			Complete
Act upon further guidance to be issued by the Department in January 2019. This will be based on analysis of NHS	Guidance	e received and acted upon.	Complete.
Trusts and Foundation Trusts' self-assessments.			Complete
Workforce		Lead: Julie Bacon	
Assess whether your organisation has incurred a reduction in the number of EU nationals in your workforce before the	in the Wo	ow recorded each month and it will be included orkforce Performance report and the Board SoF	Ongoing.
UK leaves the EU.	narrative. For instance: EU staff: Oct 18 =154 (2.76%), Nov 18 = 148 (2.61%), Dec 18 = 149 (2.63%); Jan 19 = 148 (2.59%)		Monitoring continues on an ongoing basis. No evidence to suggest reduction in
		t captures monthly information in regards to the ct of EU nationals and takes action where	numbers

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	relevant.	
Publicise the EU Settlement Scheme to your health and care staff who are EU citizens. The scheme will open fully by March 2019 and remain open until 31 December 2020 in a 'no deal' scenario, so there will be plenty of time for EU staff to register. Further information can be viewed		

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Professional regulation (recognition of professional qu	ualifications) Lead: Julie Bacon	
Inform your staff that health and care professionals (including UK citizens), whose qualification has been recognised and who are registered in the UK before 23:00 on 29 March 2019, will continue to be registered after this point.	Relevant staff have been informed of such arrangements.	Completed  Completed
Inform your staff that health and care professionals (including UK citizens), who apply to have their qualification recognised in the UK before 23:00 on 29 March 2019, will have their application concluded under current arrangements.	Not applicable. No staff are currently going through any application.	Completed  Completed
Await further information from the Government on the future arrangements for health and care professionals (including UK citizens) with an EU/EEA or Swiss qualification, who apply to have their qualification recognised in the UK from 23:00 on 29 March 2019.		Information awaited.  No further updates
Reciprocal healthcare	Lead: Julie Mayfield	
Note that, in a no deal scenario, the current arrangements for reciprocal healthcare and for overseas visitors and migrant cost recovery will continue to operate until 29 March 2019, depending on the reciprocal agreements that are concluded.	The Overseas Visitor Patient department will continue with 'business as usual' up to the 29 March deadline. After this date, in a no deal scenario, EEA reciprocal agreements will come to an end, unless we hear to the contrary.	No current issues.  No further updates
Continue to support individuals who apply for NHS authorised treatment or maternity care in another member state (the S2 and cross-border healthcare processes).	The Overseas Visitor Patient department will continue with 'business as usual' up to the 29 March deadline. We do not receive many applications for S1 or S2 certificates but again will be ready to support up to the deadline.	No current issues.  No further updates
Note that the Department will provide updates and further	The Overseas Visitor Patient department is kept updated	No current issues.

	Progress/contingency	Status
nformation on reciprocal healthcare arrangements prior to 29 March 2019.	and informed by the Department of Health and Social Care via DHSC eXchange. This is an NHS OVM shared resource space.	No further updates
Maintain a strong focus on correctly charging those who should be charged directly for NHS care. Information on mplementing the current charging regulations can be riewed on the webpage <a href="https://example.com/here/here/">here</a> .	The Overseas Visitor Patient department is committed to charging all OSV patients where it is appropriate. We always ensure we have the most updated copy of the regulations to hand and strictly adhere to the guidelines at all times.	No current issues.  No further updates
Ensure there is capacity available for any further training hat may be required if there are changes to the reciprocal nealthcare arrangements. This should be undertaken by the Overseas Visitor Management team, and guidance and support materials will be made available to support this raining.	We will ensure further training is given should there be changes to the reciprocal healthcare arrangements. The OSV Policy will require amendments and guidance information will be issued where necessary. Communication will be sent out Trust wide to alert staff to the changes. There is an expectation that the DHSC will provide some materials eg posters that we can situate in A&E and Outpatient areas to alert patients to the changes.	Training within the OSVP will not be an issue. Depending on the amount of changes etc, the training and dissemination of information may provide issues with capacity.
Note that the Department will provide updates and further information in due course. This information will cover migrant cost recovery charging after 29 March 2019 to enable NHS Trusts and Foundation Trusts to amend processes and train staff if reciprocal healthcare arrangements change.	The Overseas Visitor Patient department is kept updated and informed by the Department of Health and Social Care via DHSC eXchange. Once we are made aware of any changes to the migrant cost recovery charging after 29 March we will amend our processes and policy, we will assess what training will be required and inform staff as appropriate.	No further updates  No current issues, actions will be implemented in accordance with changes to reciprocal healthcare arrangements if/when they arise.  No further updates

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Research and clinical trials	Lead: Alison Steel	
EU research and innovation funding schemes		
Note that the Government has guaranteed funding committed to UK organisations for certain EU funded projects in the event of a 'no deal' scenario. This includes the payment of awards where UK organisations successfully bid directly to the EU while we remain in the EU, and the payment of awards where UK organisations are able to successfully bid to participate as a third country after exit, until the end of 2020.	SFH do not currently hold any research grants funded through an EU source.  As part of R&I set up process studies with EU grant funding will be highlighted and notifications from sponsor documented.	Complete  Complete
Provide information about your Horizon 2020 grant <a href="here">here</a> . This should be actioned as soon as possible. Further guidance can be found <a href="here">here</a> and all queries should be sent to <a href="here">EUGrantsFunding@ukri.org</a> .	Check research portfolio and identify where/if SFH is a participating site in an EU funded study.  If studies identified R&I will contact Chief Investigator site and request assurance that grant information has been provided to contact details as outlined in guidance. This is a sponsor responsibility.	In progress.  No further updates
Contact officials at EU-Health-Programme@dhsc.gov.uk with information regarding your Third Health Programme grant, and any queries that you have, as soon as possible.	Check research portfolio and identify where/if SFH is a participating site in an EU funded study.  If studies identified R&I will contact Chief Investigator site and request assurance that grant information has been provided to contact details as outlined in guidance. This is a sponsor responsibility.	In progress.  No further updates
Clinical trials and clinical investigations		
Follow the Government's <u>guidance</u> on the supply of investigational medicinal products (IMPs) for clinical trials in a 'no deal' scenario, if you sponsor or lead clinical trials or clinical investigations in the UK.	SFH does not currently sponsor or lead CTIMP trials.  All staff are aware of the guidance and a copy is available in the department.	Complete  Complete
Consider your supply chains for those IMPs, medical devices, in vitro diagnostic devices, advanced therapy medicinal products, radioisotopes and other clinical consumables, used in clinical trials and investigations,	SFH does not currently sponsor or lead CTIMP trials.	Complete  Complete

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which originate from, or travel through, the EU and EEA as soon as possible if you sponsor or lead clinical trials or investigations in the UK.			
Liaise with trial and study Sponsors to understand their arrangements to ensure that clinical trials and investigations using IMPs, medical devices, IVDs, advanced therapy medicinal products, radioisotopes and other clinical consumables which come from, or via, the EU or EEA, are guaranteed in the event of any possible border delays. If multiple sites are involved within the UK, then co-ordinate with the lead site or Chief Investigator in the UK, or organisation managing the clinical trial/investigation, e.g. Clinical Research Organisation, to ensure a single approach to the Sponsor.	has been	se of all trials with IMP's provided by sponsor's compiled. R&I will contact Chief Investigator request assurances on arrangements for IMP	In progress.  No further updates
Respond to any enquires to support the Department's comprehensive assessment of the expected impact of a 'no deal' exit on clinical trials and investigations. The Department is working closely with the NHS to gain a greater understanding of who might be affected by supply issues.	Confirm	ve will be able to respond in a timely manner.	Complete  Complete
Continue participating in and/or recruiting patients to clinical trials and investigations up to and from 29 March 2019. This should occur unless you receive information to the contrary from a trial Sponsor, organisation managing the trial or clinical investigation, or from formal communications that a clinical trial or clinical investigation is being impacted due to trial supplies.	Confirme	d we are compliant at SFH.	Complete  Complete
Send queries concerning IMPs or medical devices to <a href="mp@dhsc.gov.uk">imp@dhsc.gov.uk</a> .			
Data sharing, processing and access		Lead: Jacquie Widdowson	
Investigate your organisation's reliance on transfers of	Our data	flows have been mapped and are being	In progress - awaiting

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personal data from the EU/EEA to the UK, especially those that are critical to patient care and/or would have a serious impact upon the system if they were disrupted.	reviewed to ensure any transfers of personal data from the EU/EEA to the UK that are critical to patient care are uninterrupted and have adequate security applied, to enable the transfer to continue.	further guidance.
	Any transfers from the UK to any country outside the UK, these flows will fall under a new UK transfer and documentation provisions. Transfers will be reviewed to ensure adequate security is applied to enable the transfer to continue.	No further updates
	In the case of a no Brexit deal the government has already made it clear that it intends to permit data to flow from the UK to EEA countries. It is only personal transfers from the EEA to the UK that will be affected.	
	Further guidance will be issued in relation to transfers relating to Health & Social Care organisations.	
Note that many organisations tend not to disaggregate personal and non-personal data. As such, please be aware that restrictions on personal data may have knock-on effects on data more generally.	Data flow maps to be reviewed to establish the type of data that is transferred.	In progress.
	If transferring information outside of the EEA will need to consider whether to disaggregate the data.	No further updates
Follow the advice from The Department for Digital, Culture, Media and Sport and the ICO on data protection in a 'no deal' scenario, which can be viewed on <a href="mailto:gov.uk">gov.uk</a> and on the ICO <a href="mailto:website">website</a> , in particular to determine where to use and how to implement standard contractual clauses.	Reviewed information on ICO and government website, and currently this only applies to small and medium businesses.	Awaiting further guidance.
	Further information will be issued to and Health & Social Care organisations.	No further updates
Ensure that your data and digital assets are adequately protected by completing your annual Data Security and	The Data Security & Protection Toolkit score is currently 88 out of 100 mandatory evidence items provided. We	In progress.
Protection Toolkit assessment. This self-audit of compliance with the 10 Data Security Standards is mandatory to complete by the end of March 2019, but completing it early will enable health and adult social care providers to more quickly identify and address any vulnerabilities.	will continue to work on the DSPT to ensure its compliance by 31st March 2019.	No further updates
Await further guidance, which will be issued to health and	Awaiting further guidance which will be issued to Health	Awaiting further

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care providers in due course. Assistance will also be available through webinars in early 2019.	& Social Care organisations.	guidance.
		No further updates
Finance	Lead: Sandra Chapman	
rillatice	Lead. Sandra Chapman	
Record costs (both revenue and capital) incurred in complying with this guidance. Costs with a direct financial impact should be recorded separately to opportunity costs. Providers should discuss these costs with their regional NHS EU Exit support team. Feedback from providers will inform decisions on whether further guidance on cost collection is required.	Leads for each section within this document asked to provide information on the costs incurred in complying with this guidance.  Costs to be recorded based on information received.	1 1 5
Summary	Lead: Mark Stone	
The organisation has followed the DHSC guidelines in act top exercise was conducted via the Resilience Assurance been completed. A working group is meeting regularly a formalised and chaired by a Director until it is felt there is appreciated however, that some element of risk is outsic planning from central government to maintain supplies on NHSE will shortly be issuing instruction on the weekly reand it will be necessary to have clarity about roles and realist the Also the Trust needs to consider whether it needs additionally the escalation phase.	e Committee on Feb 14 <sup>th</sup> and a Risk Assessment hand I have recommended this becomes more is no longer a risk to any services. It should be the control of SFH and we remain reliant on a first critical medicines, equipment and spares. It porting process the Trust will need to comply with the sponsibilities in this regard.	is Control of the con

Collated by:
Mark Stone
Emergency Planning & Business Continuity Officer
February 2019