



Equality Screening Template

Changes to bereavement policy

Belfast City Council -Equality Screening Template

The Council has a statutory duty to screen. This includes our strategies, plans, policies, legislative developments; and new ways of working such as – the introduction, change or end of an existing service, grant funding arrangement or facility. This screening template is designed to help departments consider the likely equality impacts of their proposed decisions on different groups of customers, service users, staff and visitors.

Before carrying out an equality screening exercise it is important that you have received the necessary training first. To find out about the training needed, contact – gilmartins@belfastcity.gov.uk

The accompanying [Screening Guidance](#) note provides straightforward advice on how to carry out equality screening exercises. Detailed information about the Section 75 equality duties¹ and what they mean in practice is available on the Equality Commission's website.

The screening template has 4 sections to complete. These are:

Section A - asks you to provide details about the policy / decision that is being screened.

Section B - has 4 key questions that require you to outline the likely impacts on equality groups, and all supporting evidence.

Section C - has 4 key questions in relation to obligations under the Disability Discrimination Order

Section D - is the formal record of the screening decision.

¹ ECNI 'Section 75 of the NI Act 1998: A Guide for Public Authorities' April 2010. www.equalityni.org

Section A

Details about the policy / decision to be screened

Title of policy / decision to be screened:-

Changes to bereavement policy

Brief description of policy / decision to be screened:-

(Explain - Is this a new, revised or existing policy? Are there financial / legislative / procurement implications?)

There are 3 changes to our bereavement policy as outlined below.

1. A new memorial management policy and Belfast code of memorial safe working practice,
2. Changes to our policy on how long we hold cremated remains, and
3. How we distribute the money that we receive from recycled metals.

There are financial implications to 1 and 3.

Aims and objectives of the policy / decision to be screened:-

(What is the policy trying to achieve?)

Belfast City Council is the burial board for Belfast and we aim to provide a high-quality, fit for purpose, bereavement service and so reviewed and revised some of our policies and practices.

A new memorial management policy and Belfast code of memorial safe working practice

An important part of our responsibility is to make sure that our cemeteries, graveyards and burial grounds are safe places to work in and for the public to visit.

Historically, health and safety concerns in cemeteries focused on the risks arising from grave digging. However, in recent years there has been increasing attention on the stability of memorials and the risks these present to cemetery staff and visitors.

There have been a number of deaths nationally in recent years and many serious injuries caused by unsafe memorials. Where accidents have occurred, local authorities have been investigated by the Health and Safety Executive (HSE) and in some cases, improvement notices issued. In the most serious cases the HSE has threatened prosecution.

Responsibility for health and safety lies with us as the burial authority in control of the cemeteries. We are bound by the conditions of the Public Health (Ireland) Act 1878 Section 178, Burial Grounds Regulations (Northern Ireland) 1992 Part II No.5, Local Authorities Cemeteries Order 1977 and we have a legal duty under the Health and Safety at Work Order (NI) 1978, Management of Health and Safety at Work Regulations (NI) 2000, Occupiers Liability Act (NI) 1957 and Occupiers Liability (NI) Order 1987 to ensure that our burial grounds are safe places to work and visit. Managing memorial safety is therefore an essential part of controlling the risks to health and safety.

Whilst we have overall responsibility for the safety of our cemeteries, including risks from unstable memorials, we don't own the memorials. The owner of a memorial is the Deed Holder (grave owner of exclusive right of burial) or successor in title. This is the person responsible for maintaining the memorial so that it does not become a hazard. However, the current owner may not be identifiable as some records are extremely old and in many cases have not been updated by current relatives or family members.

This policy considers the historical problems we have faced in managing memorials and ways of dealing with unstable, hazardous and unauthorised memorials. The policy considers how the installation of new memorials should be managed and standards enforced so that we can be confident that memorials are authorised², will be more likely to remain safe and so that bereaved families receive a better product.

This policy sets out our approach to the safe erection and management of memorials in our cemeteries. We have based it on best practice and guidance issued by the

² That an application has been submitted to the Council's cemeteries office with the appropriate fee and that this has been approved.

Institute of Cemetery and Crematorium Management (Management of memorials 2012), the Ministry of Justice (Managing the safety of burial ground memorials; practical advice for dealing with unstable memorials January 2009), British Register of Accredited Memorial Masons (BRAMM) Guide and the National Association of Memorial Masons (NAMM) Code and Blue Book.

To help us manage this risk we have developed a policy that outlines the following processes:

- If you want to erect a memorial in a Belfast City Council cemetery,
- If you are a monumental sculptor wishing to work in one of our cemeteries,
- Our memorial inspection programme

Changes to our policy on how long we hold cremated remains

- Unfortunately, there are cases when a person's cremated remains (ashes) are not collected from us after the cremation.
- We had proposed that in such instances we would, after a period of 8 weeks from the cremation, scatter the cremated remains in our Garden of Remembrance at Roselawn.
- Following the consultation we have amended this policy to 16 weeks.

How we distribute the money that we receive from recycled metals

- Under our Environmental Policy, we recycle any metals that remain after a cremation has taken place, for example orthopedic implants. This is done through the Institute of Cemetery and Crematorium Management.
- We proposed that any money we receive as a result of this recycling will be donated to bereavement-related charities.
- When arranging a cremation with us, we will ask families or next of kin to nominate a bereavement-related charity.
- Twice a year, we will collate this information and the two most nominated charities will be selected to receive this money.

On whom will the policy / decision impact?

Consider the internal and external impacts (both actual or potential)

- Staff
- service users
- other public sector organizations
- voluntary / community groups / trade unions
- others, please specify – funeral directors and memorial sculptors

Are there linkages to other Agencies/ Departments?

Currently there are no links to other agencies/departments.

Section B

1. Outline consultation process achieved or planned

The following consultation has taken place:

The policies were developed based on best practice and guidance and we sought the views of the Institute of Cemetery and Crematorium during the development of the draft policies.

The views of members were sought at several points during the process and reports were brought to the following committee meetings:

Parks and Leisure Committee – February 2015

Strategic Cemetery and Crematorium Development Working Group – November 2015

People and Communities Committee – December 2015

The public consultation exercise commenced on Friday 24th July 2015 and closed on Friday 16th October 2015. As part of the consultation process four information sessions were held at which staff were available to answer any queries. These were drop in sessions and pre-registration was not required. These took place on:

Date	Venue	Any time between
Tuesday 4th August 2015	Falls Bowling Pavilion	10 am – noon
Tuesday 4th August 2015	Tullycarnet Bowling Pavilion	2- 4pm
Tuesday 18th August 2015	Grove Bowling Pavilion	10 am – noon
Tuesday 18th August 2015	Musgrave Bowling Pavillion	2- 4pm
Monday 24th August 2015	Cecil Ward Building, Linenhall Street	2- 4pm

A copy of the draft policy and online consultation questionnaire were available on the Council's website and hard copies and alternative formats of the document were available on request. An article informing residents of the consultation was also placed in the September edition of City Matters which is delivered to every household in the Belfast City Council area.

A public notice advertising the consultation and the information sessions was placed in the Belfast Telegraph, Irish News and News Letter on Friday 24th July 2015. A media release was also issued and requests were received from U105 and BBC Radio NI for a Council representative to take part in a radio interview.

The Equality Consultative Forum was made aware of the upcoming consultation at their May 2015 meeting and notification of the consultation was sent out to all the organisations on the Council's equality consultation mailing list.

Pre consultation was also carried out with funeral directors and memorial sculptors who were identified as two key stakeholders in the process. Workshops were organised for the 15th June 2015 in Malone House and all funeral directors and memorial sculptors were invited to attend.

Notification of the consultation and a hard copy of the draft policy and consultation questionnaire were also sent out to all funeral directors in Northern Ireland and the memorial sculptors that currently work in our cemeteries.

A report on the implementation of the new policy was brought to the February 2016 meeting of the Strategic Cemetery and Crematorium Development Working Group.

In March 2016 a further session was held to which all memorial sculptors and funeral directors were invited. The purpose of this session was to inform them that the policy had been agreed by Council and was being implemented from 1st April 2016. The session allowed attendees to ask questions and seek clarification around the policy.

2. Available evidence

What evidence / information (both qualitative and quantitative) have you gathered to inform this policy? Set out all evidence below to help inform your screening assessment. Please note: It is important to record information gathered from a variety of sources such as:

- Monitoring information
- Complaints
- Research /surveys
- Consultation exercise and other public authorities

Evidence gathered

A range of evidence and information has been used including that obtained from the consultation outlined in the previous question.

As the burial board for Belfast, the Council own and manage 9 cemeteries and NI's only crematorium. Through our management of these facilities we have various records that were used in the development of the 3 policies outlined above. These records include:

- Applications made for the erection of headstones - from these we can determine if there are headstones that have been erected without authorisation or paying the necessary fees.
- Complaints received around wording or imagery on headstones.
- Incidents relating to staff or visitors being injured or hurt in our cemeteries.
- Damage caused to headstones including from another headstone falling on them.
- How long we have held cremated remains for.
- The amount of money that we have obtained from the recycling of metals remaining after cremation.

In addition to the Council’s own records we sought advice and guidance from the Institute of Cemetery and Crematorium and looked at what other local authorities have in place in relation to these issues.

Section 75 category	Details of evidence / information and engagement
Religious belief	See details above
Political opinion	See details above
Racial group	See details above
Age	No specific information was gathered in relation to this category.
Marital status	No specific information was gathered in relation to this category.
Sexual orientation	No specific information was gathered in relation to this category.
Men & women generally	No specific information was gathered in relation to this category.
Disability	No specific information was gathered in relation to this category.
Dependants	No specific information was gathered in relation to this category.

3. What is the likely impact (indicate if the policy impact is positive or negative) on equality of opportunity for those affected by this policy, for each of the Section 75 equality categories? What is the level of impact?

There is likely to a minor positive impact on all groups by the introduction of these policies in that they will mean a consistent approach for all our users, will introduce clear terms and conditions and the memorial management policy will ensure that our cemeteries are safe, open and accessible spaces for both staff and visitors. The evidence gathered suggests that there are some headstone with wording or imagery that may be perceived to be offensive to people of different religious beliefs, political opinions or racial groups and that the consistent approach outlined may have a positive impact in addressing this.

Section 75 category	Likely impact?	Level of impact? Minor/Major/None
Religious belief	See detail above	Minor
Political opinion	See detail above	Minor
Racial group	See detail above	Minor
Age	See detail above	Minor
Marital status	See detail above	Minor
Sexual orientation	See detail above	Minor
Men and women generally	See detail above	Minor
Disability	See detail above	Minor
Dependants	See detail above	Minor

4. Are there opportunities to better promote equality of opportunity for people within the Section 75 equalities categories?

It is our belief the introduction of these policies provides opportunities to better promote equality of opportunity for people within all S75 categories as they will introduce a consistent approach for all users and outline clear terms and conditions. In particular the memorial management policy is based on best practice and guidance from a number of industry bodies. All relevant staff will be trained in the application of the policy to ensure a fair and consistent approach.

Section 75 category	If Yes, provide details	If No, provide reasons
Religious belief	Yes – see detail above	
Political opinion	Yes – see detail above	

Racial group	Yes – see detail above	
Age	Yes – see detail above	
Marital status	Yes – see detail above	
Sexual orientation	Yes – see detail above	
Men and women generally	Yes – see detail above	
Disability	Yes – see detail above	
Dependants	Yes – see detail above	

5. To what extent is the policy likely to impact (positive or negatively) on good relations between people of different religious belief, political opinion or racial group? What is the level of impact?

Good relations category	Likely impact?	Level of impact? Minor/Major/None
Religious belief	There is likely to a minor positive impact on people of differing religious beliefs by the introduction of these policies and associated processes and procedures with appropriate staff training, in that they will mean a consistent approach to all our users and the policies will introduce clear terms and conditions.	Minor
Political opinion	There is likely to a minor positive impact on people of differing political opinions by the introduction of these policies and associated processes and procedures with appropriate staff training, in that they will mean a consistent approach to all our users and the policies will introduce clear terms and	Minor

	conditions.	
Racial group	There is likely to a minor positive impact on people of differing racial groups by the introduction of these policies and associated processes and procedures with appropriate staff training, in that they will mean a consistent approach to all our users and the policies will introduce clear terms and conditions.	Minor

6. Are there opportunities to better promote good relations between people of different religious belief, political opinion or racial group?

Good relations category	If Yes, provide details	If No, provide reasons
Religious belief	It is our belief that several of the proposed actions will provide opportunities to better promote good relations between people of different religious beliefs in that we now have a consistent approach to all our users and the policies will introduce clear terms and conditions.	
Political opinion	It is our belief that several of the proposed actions will provide opportunities to better promote good relations between people of different political opinions in that we now have a consistent approach to all our users and the policies will introduce clear terms and conditions.	
Racial group	It is our belief that several of the proposed actions will provide opportunities to better promote good relations between people of different racial groups in that we now have a consistent approach to all our users and the policies will introduce clear terms and conditions.	

Section C

Belfast City Council also has legislative obligations to meet under the [Disability Discrimination Order](#) and Questions 5 -6 relate to these two areas.

Consideration of Disability Duties

7. Does this proposed policy / decision provide an opportunity for the Council to better promote positive attitudes towards disabled people?

Explain your assessment in full

This policy does not provide an opportunity for the Council to better promote positive attitudes towards disabled people due to the nature of the policy and what it relates to i.e. this is an operational procedure for a universal service.

8. Does this proposed policy / decision provide an opportunity to actively increase the participation by disabled people in public life?

Explain your assessment in full

This policy does not provide an opportunity for the Council to actively increase the participation by disabled people in public life due to the nature of the policy and what it relates to i.e. this is an operational procedure for a universal service.

9. Monitoring Arrangements

Section 75 places a requirement the Council to have equality monitoring arrangements in place in order to assess the impact of policies and services etc; and to help identify barriers to fair participation and to better promote equality of opportunity.

Outline what data you will collect in the future in order to monitor the impact of this policy / decision on equality, good relations and disability duties.

Equality	Good Relations	Disability Duties
<p>Records of the memorial inspection programme will be retained and this will identify headstones that have been erected without permission and the actions that we have taken to rectify this.</p> <p>The Bereavement Board will undertake an annual review of the implementation of the policies and the findings of this and any suggested amendments will be brought to the Strategic Cemetery and Crematorium Development Working Group for consideration and agreement.</p>	<p>Records of the memorial inspection programme will be retained and this will identify headstones that have been erected without permission and the actions that we have taken to rectify this.</p> <p>The Bereavement Board will undertake an annual review of the implementation of the policies and the findings of this and any suggested amendments will be brought to the Strategic Cemetery and Crematorium Development Working Group for consideration and agreement.</p>	<p>Due to the nature of the policy it does not impact on disability duties and therefore no data will be collected in relation to this.</p>

Section D

Formal Record of Screening Decision

Title of Proposed Policy / Decision being screened

Changes to bereavement policy

I can confirm that the proposed policy / decision has been screened for:

x	equality of opportunity and good relations
x	disabilities duties

On the basis of the answers to the screening questions, I recommend that this policy / decision is:

*place an X in the appropriate box below

	* <u>Screened In</u> – Necessary to conduct a full EQIA
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	* <u>Screened Out</u> – No EQIA necessary (no impacts) Provide a brief note here to explain how this decision was reached:
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X	* <u>Screened Out</u> – Mitigating Actions (minor impacts) <ul style="list-style-type: none">• Provide a brief note here to explain how this decision was reached: The changes to the bereavement policy have been assessed as having positive impacts on users as they are introducing a consistent approach and clear terms and conditions for all users. In particular the memorial management policy will ensure that our
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cemeteries are safe, open and accessible spaces for all users.

Explain what mitigating actions and / or policy changes will now be introduced:

The new policies as outlined in Section A of this document will be introduced. Regular reports will be brought to the Strategic Cemetery and Crematorium Development Working Group updating them on the progress of implementation of the various elements of this policy and where applicable making recommendations for further amendments to them.

Formal Record of Screening Decision (cont)

Screening assessment completed by (Officer level) -

Name: Claire Sullivan

Date: 7th September 2016

Department : City and Neighbourhoods

Screening decision approved by -

Name: Rose Crozier

Date: 7th September 2016

Department : City and Neighbourhoods

Please save the final version of the completed screening form and forward to the Equality and Diversity Officer – gilmartins@belfastcity.gov.uk. The screening form will be placed on the BCC website and a link provided to the Council's Section 75 consultees.

For more information about equality screening contact –

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