



**COLERAINE
BOROUGH COUNCIL**

COLERAINE BOROUGH COUNCIL

EQUALITY IMPACT ASSESSMENT

BURIAL GROUNDS

NOVEMBER 2003

CONTENTS

		PAGES
1.0	EXECUTIVE SUMMARY	3 – 6
2.0	INTRODUCTION	6 – 8
3.0	BACKGROUND	8 – 9
4.0	CONSTRAINTS	9 – 11
5.0	POLICY AIM & OBJECTIVES	11
6.0	CONSIDERATION OF AVAILABLE DATA AND RESEARCH	11 – 13
7.0	THE DATA	13 – 19
8.0	ASSESSMENT OF IMPACT	19 – 20
9.0	FORMAL CONSULTATION AND PUBLICATION OF RESULTS OF THIS ASSESSMENT	20 - 21
10.0	RECOMMENDATION	21
11.0	APPENDICES	22 - 35

BURIAL GROUND POLICY - EQUALITY IMPACT ASSESSMENT

1.0 EXECUTIVE SUMMARY

- 1.1 Coleraine Borough Council is committed to fulfilling its responsibilities under Section 75 of the Northern Ireland Act 1998. In its Equality Scheme the Council gave an undertaking to carry out an Equality Impact Assessment on each policy or group of co-joined policies where screening had indicated significant issues in relation to one or more of the nine equality dimensions.
- 1.2 Council's Burial Grounds Policy was identified as one such policy and following consultation was scheduled to be carried out in year one of the programme. The stated aim of the Policy is "To provide the community with well managed burial grounds, which are sustainable, attractive, sensitive and affordable."
- 1.3 The Equality Impact Assessment was carried out by Council Officers in accordance with the Practical Guidance Equality Impact Assessments issued by the Equality Commission for Northern Ireland.
- 1.4 In carrying out the Equality Impact Assessment, Council has taken into account information and data from a number of sources. These sources did not suggest that the Council's Burial Ground Policy had been a significant cause for concern among the residents of the Borough. Indeed several of the sources indicated that the current policy where the Lawn System of Management is in place, was the best method of maintenance. However, Council in order to promote equality of opportunity and good relations, felt it was important to review the policy objectives and the operational management policy to ascertain if there were any adverse impacts.
- 1.5 Qualitative and Quantitative data was obtained from the following nine sources:
- Burial Grounds Usage
 - Meetings with local clergy
 - Meeting with local Funeral Directors and Monumental Sculptors
 - Meeting and petition presented by representatives of the Respect for the Deceased Group
 - A Questionnaire sent to all District Councils in Northern Ireland
 - Meeting with the relevant Trade Unions
 - Best Value Customer Satisfaction Survey
 - Meeting with Council Registrar

- Correspondence received from Mintlyn Crematorium and the
- Institute of Burial and Crematorium Administration.

In addition Council wrote to groups informing them that they were at the data collection stage of the process and would be grateful for any input they would like to contribute. An advertisement was also placed in the local media.

- 1.6 The sourced data, both qualitative and quantitative, suggests that Council's policy aim on burial grounds, its policy objectives and operational policies do not have an adverse or differential effect on any of the nine Section 75 categories.

It is conceivable that burial practices associated with some religious beliefs and/or racial groups may not be accommodated by Council's existing policies on burial grounds. However, the experience of local Undertakers suggests that this potential problem has not materialised to date; as does the existence of similar policies in other Northern Ireland Councils and GB Councils.

There is however clear evidence that some people dislike the operational policy known as the 'lawn system' and feel strongly about it. They want the flexibility to erect grave surrounds in Council burial grounds. This is not a Section 75 issue; rather it is a question of whether or not Council can accommodate the views of a minority alongside those of a majority at an acceptable cost to the majority. In this circumstance the known minority is of the order of 3% of the Borough's population (the Research and Evaluation Services (RES) 400 person survey) and the first hurdle would be, setting aside a section in some or all of the Burial Grounds for graves with surrounds.

Most of the other dissatisfied responses (11%) in the RES survey were largely concerned about the appearance of the Burial Grounds, primarily due to vandalism. There is greater potential for vandalism in those sections of Burial Grounds with surrounds and so there is a potential second hurdle of higher levels of dissatisfaction if there are more surrounds, unless vandalism can be lessened.

Most residents were satisfied with the Burial Grounds (RES 52%) and many had no views (34%) reflecting the fact that many people use Church Grounds.

The results of the survey undertaken by the local lobby group are not inconsistent with the RES survey but do suggest a higher level of support for choice than the 3% who may want to exercise that choice; at least 10%.

There is a related issue associated with choice and that is the timing of that choice. If there is to be choice, ideally that choice is informed and exercised when the burial plot is bought. This may not coincide with the views of the bereaved at the date of burial nor indeed with the subsequent views over the following years. If there is a choice between a lawn system and a surround section in a Burial Ground, the choice cannot be retrospective without negating that choice for others.

1.7 Mitigating Measures

If a choice is offered between the lawn system and a surrounds section in one or more of the Council Burial Grounds – the wishes of those who want surrounds are addressed. If the charges for the surrounds section reflect the additional short and long term costs* of provision and maintenance – there is no cost to the majority of residents. If ministers, undertakers and Council's cemetery staff advise people to make a considered and long term decision when they are buying plots and arranging burials – the advantages of both the lawn system and a surround section can continue to be available to all.

1.8 Consultation

The findings of the Equality Impact Assessment were reported in the press and posted on the Council's website. In addition a copy of the Executive Summary was forwarded to everyone on the Consultation list and a full copy of the Assessment given to everyone who had contributed data.

The consultation period was from the 1st July 2002 – 30th September 2002. Only two responses were received (Appendix 4). The first a critical reply from the Respect for the Deceased and a supportive response from the Coleraine Standing Conference of Women's Organisations. However the view of Council's Equality Working Group was that the Impact Assessment already positively addressed the concerns made in the critical response.

1.9 Recommendation

The Equality Impact Assessment recommends that where there is a proven demand for surrounds and where the capacity of the cemetery permits, a section(s) of the cemetery will be set aside for graves with surrounds, thus offering a choice. This demand has been proven in

* Additional costs arise from the provision of wider access paths and working space for mechanical digging and for the need of more long-term maintenance to keep surrounds/graves safe and tidy.

Coleraine Cemetery. As stated previously, the choice cannot be retrospective without negating that choice for others.

This recommendation was taken to Council's Policy and Development Committee for consideration. At that meeting the Committee referred the recommendation back to the Equality Working Group.

At a subsequent meeting of the Working Group, it was unanimously agreed, that there were no equality issues as laid down under Section 75 and that the policy of Council to have a lawn or surround system or both, was an operational decision only.

1.10 Promoting Good Relations

Council's Equality Scheme and the Equality Commission's Practical Guidance on Equality Impact Assessments require Council to consider the duty to promote good relations when undertaking an Equality Impact Assessment. This is a duty to promote good relations between persons of different religious belief, political opinion or racial group. Council's cemeteries function offers little scope to promote good relations other than exercising sensitivity and maintaining close contact with ministers and undertakers, which it already does.

1.11 Monitoring For Adverse Impact

The Equality Impact Assessment concluded that there was no adverse impact on equality of opportunity for any of the nine categories specified in Section 75. Accordingly there is no need for monitoring other than that of taking customer views on the service provided. This customer service monitoring will be continued.

2.0 INTRODUCTION

2.1 Section 75 of the Northern Ireland Act 1998 requires all public authorities when carrying out their functions, to have due regard to the need to promote equality of opportunity between nine categories of persons, namely:

- between persons of different religious belief, political opinion, racial groups, age, marital status or sexual orientation
- between men and women generally
- between persons with a disability and persons without and

- between persons with dependants and persons without

In addition, without prejudice to its obligations above, the Council shall in carrying out its functions, have regard to the desirability of promoting good relations between persons of different religious belief, political opinion or racial group.

2.2 Public Bodies in their Equality Schemes, approved by the Equality Commission, set out how they proposed to fulfill their statutory duties. Existing policies were screened to assess whether they impacted on the promotion of equality of opportunity or the duty to promote good relations using the following criteria:

- Is there any evidence of higher or lower participation or uptake by different groups?
- Is there any evidence that different groups have different needs?
- Is there an opportunity to promote equality of opportunity between the relevant different groups, either by altering the policy, or by working with others in government or in the larger community, in the context of the policy?
- Have consultations with relevant groups, organisations or individuals indicated that policies of that type create problems specific to any relevant groups.

2.3 Following this screening process and the associated consultation, Council developed a 5-year Equality Impact Assessment programme. This programme included Council's policy on Burial Grounds, the subject of this Equality Impact Assessment.

2.4 The primary function of the Equality Impact Assessment is to determine the extent (if any) of differential impact of the Burial Grounds Policy upon the relevant groups. If an adverse effect is identified, the Equality Impact Assessment must consider alternative or mitigating measures.

2.5 Consideration of Available Data and Research

The intention of this section is to consider available data and research to see how the Burial Grounds policy impacts upon the nine categories under Section 75. Assessing any adverse impacts of policies cannot be fully effective unless all quantitative and qualitative data is available and accessible. At the present time limited data is available to monitor the impact of the policy under review and Council may need to consider

more effective monitoring systems.

With regard to the Policy there are three main strands:

- initial consultation which identifies those areas of the service which the community considers to be priorities
- consultation on the draft document before final approval
- the general availability of the final document

2.6 In undertaking the Equality Impact Assessment Council followed the guidance issued by the Equality Commission (Practical Guidance on Equality Impact Assessments). The seven separate stages of the Equality Impact Assessment are:

1. Consideration of available data and research.
2. Assessment of Impacts.
3. Consideration of resources that might mitigate any adverse impacts and alternative policies that might better achieve the promotion of equality of opportunity.
4. Formal Consultation.
5. Decision by Public Authority.
6. Publication of results of the Equality of Impact Assessments.
7. Monitoring of Adverse Impact.

2.7 This document is being circulated for consultation and only contains the first three elements of the Equality Impact Assessment. The remaining stages will be undertaken following consideration of the feedback from stage 4 (formal consultation).

3.0 BACKGROUND

3.1 Council currently operates 5 burial grounds at Coleraine, Portrush, Agherton, Portstewart and Kilrea. The map (Appendix 1) shows their locations. Council's burial grounds are open to anyone to use if they buy a plot, which subject to timing, typically holds 3 burials.

3.2 Council introduced a Lawn System of management in its burial grounds in May 1976, to take effect whenever new sections were opened for the first time. The operational policy permits only the following:

- an area at each grave, 1.2 metres wide by 0.9 metres, for the planting of flowers and/or the erection of a monument or memorial. The remaining portion of each grave shall be sown or planted with

grass and be left clear of any vases, holders or other additions. If after the erection of a monument/memorial, any portion of the area reserved for the erection of any monument/memorial or planting of flowers, remains, it may be cultivated. In the case of graves which have not been cultivated, the Council, may at its discretion have such areas sown or planted with grass. In the normal course of grass cutting, Council will take all reasonable precautions to avoid cut grass falling on the memorial/flower area at each grave.

- No glass, plastic or permanent wreaths should be permitted on a grave.
- No wreaths or mementoes shall be permitted to remain on the grave longer than four weeks after the date of burial.
- No railings, chains, plinths or other enclosures will be permitted.

The Lawn System of Management was operationally introduced in Portrush Burial Ground in May 1986, Coleraine in November 1987 and Portstewart in October 1989. It has not been introduced to Kilrea, as no new sections have been opened to date.

Council at its meeting in April 1998 reaffirmed its policy of operating the Lawn System in all new sections of its Burial Grounds.

4.0 CONSTRAINTS

The current Burial Ground Policy of Council was devised and implemented, bearing in mind a number of constraints that could impact upon service delivery. These constraints include:

- Availability of Burial Ground Land
- Maintenance Costs
- Health and Safety Requirements
- Affordability

Availability of Burial Ground Land

Council has currently five working burial grounds in the Borough; Coleraine, Agherton, Portstewart, Portrush and Kilrea. All other cemeteries are full and closed to new openings. Within these five burial grounds there is a finite number of plots available to the general public.

When these are taken, Council will have extreme difficulty in identifying and purchasing suitable land for conversion into new cemeteries. The replacement cost bearing in mind the current price of land in the Triangle of Coleraine, Portrush and Portstewart would be substantial. The Lawn System style of management requires less acreage than the traditional method of burial with surrounds.

Maintenance Costs

The maintenance costs to the ratepayer in 2001 were approximately £90,000. In 2002 these costs had escalated to approximately £125,000 an increase of 39%. The Lawn System of management has generally been recognised as less costly than the surround system, mainly due to the fact that labour costs can be reduced. In addition there are inherent costs associated with the development of pathways which would be required under health and safety guidelines for the continuation of or introduction of any new surround sections.

Health and Safety

Currently Council staff have extreme difficulty in the re-opening of any plot that has a surround. Quite often the grave cannot be reached with by a mechanical digger and staff have to “dig out” by hand. Not only does this take considerable time in often difficult winter working conditions, but it also puts at risk members of staff who have to enter the grave. There is a real danger of flooding and possible “cave in”.

Affordability

The current costs for burial services within the Borough are listed below:

Item	Resident	Non Resident
Purchase of single grave plot	£100.00	£200.00
Purchase of Additional Plots	£100.00	£200.00
Interment Fee (over 2 years of age)	£100.00	£200.00
Interment Fee (under 2 years of age)	£25.00	£50.00
Interment Fee (stillborn/ashes)	£25.00	£50.00
Permission to erect memorial	£25.00	£25.00
Tree and Plaque – Garden of Remembrance	£80.00	£160.00
2 nd and subsequent burial of ashes at same time	£25.00	£50.00

The cost to maintain the traditional surround method of burial in the long term is much more expensive; it is estimated that charges for those who

wish to have such a grave, could increase by 200%. At the present time Council has a uniform pricing policy in its burial grounds which it considers affordable to all its residents. A change in policy may result in increased costs, which may have to be passed onto the consumer.

5.0 POLICY AIM & OBJECTIVES

5.1 Council's existing operational policies sit within the general policy aim of providing the community with well managed burial grounds, which are sustainable, attractive, sensitive and affordable.

This policy aim has the following objectives:

- To provide a dignified cemetery environment with good visual appearance
- To have in place a well planned maintenance programme that is cost effective and affordable
- To provide a safe and secure environment for cemetery staff and visitors
- To ensure in the long term that all graves and memorials are at all times kept in good order and repair
- To provide a standard level of maintenance and care

The Equality Impact Assessment addresses the policy aim, policy objectives and operational policies.

6.0 CONSIDERATION OF AVAILABLE DATA AND RESEARCH

6.1 Sourcing Data

The preliminary exercise by the service manager identified the following potential sources of data:

- General Registrars Office
- Customer/Resident Satisfaction Survey of January 2001
- Practices in other Northern Ireland District Councils
- Existing Policies and Procedures
- Cemetery Policy (Lawn System)

The full schedule of interest groups is listed in Appendix 2.

In October 2001 a letter was issued to these groups. This letter summarised the policies under review and informed the groups that Council was currently at the data collection stage of the process and would be grateful to have their input at an early stage. Any comments would be welcomed including general views, statistical data or simply evidence of personal experiences. If any group had access to or knew of any data that would assist in reviewing the policy, they were requested to provide details. Information could be submitted by post, fax, email or a meeting could be arranged if this would prove to be more suitable. It was stressed that this was an informal consultation to inform the assessment work and that there would also be a formal consultation period in 2002.

6.2 Three responses were received from this informal consultation asking Council to consult with other bodies/agencies:

1. A response from James McMullan & Son Funeral Directors requesting that Monumental Sculptors be invited to participate.
2. A response from Mr A Eakin requesting that disabled, religious minorities, environmental and the travelling community be consulted.
3. A response from the Respect for the Deceased Group requesting that the following be consulted:

Charter for the Bereaved Organiser – Carlisle

Institute of Burial and Cremation Administration

Bedford, Coventry, Portchester, Marthale, Aberdone, Exeter, Harwood Park, St Albans, Stafford, Middlesborough, Richmond, Kings Lynn, Cardiff, Croydon, Broxbourne, Mansfield, S. West Middlesex, Brent, Shrewsbury, Crewe, Truro, Warrington, Telford, Peterborough, Huddersfield, Carlisle, Newcastle, Sunderland, Bournemouth and London Councils.

The Muslim Community

The Indian Community

Travelling Community

6.3 In addition a number of meetings were held with interest groups to help develop sources of data. These were:

- Two meetings were arranged whereby 73 clergy from the Borough were invited to attend
- One meeting was arranged whereby seven local Funeral Directors and Monumental Sculptors were invited to attend
- One meeting was arranged with the Respect for the Deceased Group who were invited to present relevant data
- Invitations to assist with data collection were also forwarded to:

Staff Trade Unions
 Age Concern, Coleraine
 Mintlynn Crematorium – Kings Lynn
 Shrewsbury Borough Council
 Bournemouth Crematorium
 Walton Lea Crematorium – Warrington
 Institute of Cremation & Burial Administration

7.0 THE DATA

As mentioned previously, qualitative and quantifiable data was drawn from the following sources:

1. Burial Grounds usage
2. meetings with clergy
3. meeting with funeral directors and monumental sculptors
4. meeting and petition presented by the Respect for the Deceased Group
5. questionnaire to District Councils (NI)
6. meeting with relevant Trade Unions
7. Best Value Customer Satisfaction Survey
8. meeting with Coleraine Borough Council Registrar
9. correspondence received from:
 - Mintlyn Crematorium
 - Institute of Burial and Cremation Administration

In addition Shrewsbury Borough Council, Bournemouth Crematorium and Walton Lea Crematorium were directly invited to provide data, but did not respond.

Full minutes of the meetings are available on request. The following data expresses the views and opinions of the relevant groups:

Burial Grounds Data

The records for burials of different religious groups in Council Burial Grounds provide more of a measure of how much space there is in the associated local church graveyards than anything else. Where a local graveyard is full, burials for that religious group are higher and vice versa. In recognition of traditional sensitivities, Council offers the choice of a Protestant or Catholic section within the Burial Grounds, both of which are used.

Other minorities are offered the choice of which of these sections they want to use. There is one known instance of this being unacceptable within the past 10 years. This was for a Greek Orthodox funeral but the concern was that no guarantee could be given that the remains could be disinterred for later removal.

It is known that some eastern religions prefer cremation to burial and so use the Belfast City Crematorium. Burial Grounds are unlikely to meet their requirements and provincial demand for cremations would not justify a local crematorium.

In conclusion, more sensitive and reliable data can be drawn from the views and experience of the local clergy on the usage of the Burial Grounds.

Meeting with Clergy (Protestant and Catholic)

The relevant data collected at the two meetings held with the local clergy was as follows:

- Undertakers must help to enforce the policy re the lawn system
- Any change in policy by Council should not be implemented without clergy consultation
- If people were given a choice what would happen if they want to change from one system to the other
- Can the current system be enforced?
- The costs for plots in a surround section should be more expensive to allow for upkeep in later years
- Appreciative of Council approach and in general quite happy with the lawn system

- Possibility of giving choice
- Who is responsible for surrounds; family or Council, who maintains when relatives are gone, can families change their mind and have grave maintained by Council?
- Any Council surveys carried out to assess objections to lawn system
- Would there be problems in the future with ethnic groups.
- Overall the general opinion is that the lawn system is best with regard to appearance and ease of maintenance.

Meeting with Funeral Directors and Monumental Sculptors

The relevant data collected at the meeting with local Funeral Directors and Monumental Sculptors was as follows:

- Lawn system is better with regard to access at time of burial, both from an operational and health and safety point of view
- Rules with regard to burial are generally accepted and are explained at the time by Funeral Directors
- Several people from Coleraine have opted to have burials in the new Portstewart Cemetery because it is in the lawn system
- Have had no special requests from ethnic groups regarding burial, some ethnic groups are buried in Agherton
- Have had no request for woodland burials
- Overall opinion is that lawn system is best

Meeting with the Respect for the Deceased Group

The relevant data collected at the meeting with the Respect for the Deceased Group is as follows:

- Would like freedom of choice for type of burial in all cemeteries
- Would like separate areas within each cemetery for all types of burials i.e. lawn, surrounds, woodlands, infants etc.

- There should not be an extra charge for a plot with a surround. All plots should be same price.
- Any changes made to the lawn system should be made retrospectively
- Council has failed to provide a dignified cemetery environment throughout the Borough
- Coleraine Borough Council has not offered a high standard of care
- Discrimination exists within the Council Policy
- Prior to 1998 relatives did not receive the rules and regulations until after interment
- The present policy to maintain the lawn system is based purely on economics
- Graves are desecrated by Council machinery
- People should not be asked to sign away their rights and the rights of their heirs and successors, while in a state of bereavement
- 50% of graves have a footstone rather than headstone
- Petition (see Appendix 3).

Questionnaire to District Councils

The relevant data collected through the questionnaire sent to Local Authorities in Northern Ireland is as follows, there were 21 replies:

- Eighteen of those Councils who replied operate the lawn system method of burial
- Seventeen of those Councils who replied do not permit surrounds to be erected
- All those Councils who replied do not have a separate burial area for surrounds
- Only one Council that permits surrounds charges an additional fee for this

Meeting with Trade Unions

The relevant data collected at the meeting held with the Trade Unions is as follows:

- Any policy implemented by Coleraine Borough Council should look after the Health and Safety requirements of its employees
- Employees should not have to “dig graves by hand”
- Employees should not have to physically enter a grave
- It is much more difficult to open a grave with a surround for a second burial
- Some graves in the old surround section are badly maintained and dangerous

Best Value Customer Satisfaction Survey

As part of its recent Best Value Customer Satisfaction Survey, undertaken by Research & Evaluation Services (RES) in January 2001 the following question was put to 400 residents “How satisfied or dissatisfied are you with your Council’s performance in the management of its cemeteries?”. The data collected was as follows:

- 14% of people are dissatisfied with Council’s management of its cemeteries

All of those who had expressed dissatisfaction were asked “Why are you dissatisfied with your Council’s performance in the management of its cemeteries?” The data collected was as follows:

- 3% of all residents were dissatisfied with regard to Council’s burial ground policy. The other 11% of complaints related to vandalism, poor maintenance, staffing levels etc.

Meeting with Council Registrar

The relevant data collected at the meeting held with the Council Registrar is as follows:

- Approximately 5% of Funeral Directors, Monumental Sculptors and public have comments on the Council’s current policy

- In 2001 there were 285 burials
- Some families are upset with regard to momentos/wreaths being removed after a four week period
- Some families are upset about grass cutting equipment driving over the grave
- Families no longer need to worry about maintaining their grave
- Some families who have graves in parts of the cemetery that are not in the lawn system, have requested the removal of their surround and that Council turf over the grave for easier maintenance.

Correspondence from Mintlyn Cemetery

The relevant data received from Mintlyn Cemetery is as follows:

- Up until last 1998 this Authority provided only the lawn system of management
- They now provide surrounds in designated sections of the cemetery
- The majority of people still opt for the lawn system
- Restrictions on the size of memorials have been relaxed
- Coleraine Council's regulations appear to be reasonable but perhaps greater choice in the type and form of memorial could be offered.

Correspondence received from Institute of Burial and Cremation Administration

The relevant data received from the Institute of Burial and Cremation Administration is as follows:

- The Lawn System in Coleraine appears to mirror schemes available at most cemeteries, with the clauses designed to control unauthorised objects being reasonable
- Lawn type memorials that are available, appear to be rather sterile objects and as such, families tend to personalise such memorials, by placing personal items and articles, which in some instances become health and safety hazards and will affect the maintenance of the cemetery

- Public should have the right to place and maintain a memorial within the constraints of regulations in force or to leave the grave unmarked
- The range and variety of memorials should be extended
- There should be greater choice and flexibility
- The lawn type grave is generally the only option available at most cemeteries
- The lawn system is perceived as offering the cheapest maintenance regime, allows easy and unimpeded mowing but the loss of individuality, artistic skill and any element of choice is evident
- The lawn type grave reduces the many disadvantages of the traditional grave including the need for a more expensive memorial, the removal of the memorial for a burial and higher maintenance etc
- There should be choice of a minimum of three grave types, lawn, traditional and natural.

8.0 ASSESSMENT OF IMPACT - SUMMARY OF DATA EVALUATION

The sourced data, both qualitative and quantitative, suggests that Council's policy aim on burial grounds, it's policy objectives and operational policies do not have an adverse or differential effect on any of the nine Section 75 categories.

It is conceivable that burial practices associated with some religious beliefs and/or racial groups may not be accommodated by Council's existing policies on burial grounds. However, the experience of the local Undertakers suggests that this potential problem has not materialised to date; as does the existence of similar policies in other NI Councils and in GB Councils.

There is however clear evidence that some people dislike the operational policy known as the 'lawn system' and feel strongly about it. They want the flexibility to erect grave surrounds in Council burial grounds. This is not a Section 75 issue; rather it is a question of whether or not Council can accommodate the views of a minority alongside those of a majority at an acceptable cost to the majority. In this circumstance the known minority is of the order of 3% of the Borough's population (the Research and Evaluation Services (RES) 400 person survey) and the first cost would be setting aside a section in

some or all of the Burial Grounds for graves with surrounds.

Most of the other dissatisfied responses (11%) in the RES survey were largely concerned about the appearance of the Burial Grounds, primarily due to vandalism. There is greater potential for vandalism in those sections of Burial Grounds with surrounds and so there is a potential second cost of higher levels of dissatisfaction if there are more surrounds, unless vandalism can be lessened.

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9.0 CONSULTATION

The findings of the Equality Impact Assessment were reported in the press and posted on the Council's website. In addition a copy of the Executive Summary was forwarded to everyone on the Consultation list and a full copy of the Assessment given to everyone who had contributed data.

The consultation period was from the 1st July 2002 – 30th September 2002. Only two responses were received (Appendix 4). The first a critical reply from the Respect for the Deceased and a supportive response from the Coleraine Standing Conference of Women's Organisations. However the view of Council's Equality Working Group was that the Impact Assessment already positively addressed the concerns made in the critical response.

10.0 RECOMMENDATION

The Equality Impact Assessment recommends that where there is a proven demand for surrounds and where the capacity of the cemetery permits, a section(s) of the cemetery will be set aside for graves with surrounds, thus offering a choice. This demand has been proven in Coleraine Cemetery. As stated previously, the choice cannot be retrospective without negating that choice for others.

This recommendation was taken to Council's Policy and Development Committee for consideration. At that meeting the Committee referred the recommendation back to the Equality Working Group.

At a subsequent meeting of the Working Group, it was unanimously agreed, that there were no equality issues as laid down under Section 75 and that the policy of Council to have a lawn or surround system or both, was an operational decision only.

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Monitoring For Adverse Impact

The Equality Impact Assessment concluded that there was no adverse impact on equality of opportunity for any of the nine categories specified in Section 75. Accordingly there is no need for monitoring other than that of taking customer views on the service provided. This customer service monitoring will be continued.

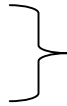
APPENDIX 1

APPENDIX 2

1. Persons/bodies specific to providing and maintaining graves in Council's Cemeteries:

Clergy

Undertakers



Using Coleraine Borough Council cemeteries

Respect for the Deceased Group

Staff Trade Unions

Registration of Births, Marriages and Deaths (Coleraine Office and General Registrars Office)

Age Concern Coleraine Office

Bereavement Support Groups

2. Coleraine Borough Council

All 22 elected Members will be given the opportunity to respond on all EIAs.

3. Northern Ireland District Councils

All the other Northern Ireland District Councils, 25 in number, will be given the opportunity to respond on all EIAs

4. Newspaper Advertisement

Members of the public will be invited to respond to a newspaper advertisement.

5. Local persons/groups previously consulted about screening will be given the opportunity to respond to all EIAs.

Mr J Austin
Friends of the Earth
14 William Street
LIMAVADY

Coleraine Youth Council
9a Abbey Street
COLERAINE

Mrs Joan Christie
Womens' Institute
Ballybogey House
Ballybogey
BALLYMONEY
BT53 6MS

Gill Michael
Causeway Area Peace Network
9 Drumtarsey Road
COLERAINE
BT51 3ED

Ms Liz Baird
Focus on Family
11-13 Glenburn Crescent
COLERAINE
BT52 2QR

Ms Joan Hunter
Kilcranny House
21 Cranagh Road
COLERAINE
BT51 3NN

Mr M Burns
NE Forum on Disability
9a Railway Road
COLERAINE
BT52 1PD

Sheila Fairon
34b New Row
COLERAINE
BT52 1AF

Joyce Cavalleros
87 Hopefield Road
PORTRUSH
BT56 8NZ

Denise Fisher
2b Glendun Crescent
PORTRUSH

Chinese Society
c/o Student Union
University of Ulster
Cromore Road
COLERAINE

Chairperson (Advisory Committee)
Ballysally Community Centre
Ballysally Road
COLERAINE
BT57 8SB

Angela Welch
Coleraine & District Citizens' Advice Bureau
24 Lodge Road
COLERAINE
BT52 1NB

Forever Young Network
Mrs Sabine Jones
15 Castlewalk
CASTLEROCK
BT51 4TP

Coleraine Council of Ministers
Pastor Edwin Ewart
Coleraine Baptist Church
5 Bannvale
COLERAINE

Elizabeth Gaston
Women's Standing Committee
33 Kingsbury Gardens
COLERAINE

Ann Gilmour
Mothers' Union Holy Trinity Church
40 Kerr Street
PORTRUSH

Mary Hastings
Portrush Community Development Group
c/o Causeway Institute
Dunluce Avenue
PORTRUSH
BT56 8DW

Zoe McClelland/Wyona Madden
Housing Estates Project
34b New Row
COLERAINE
BT52 1AF

Indian Society
c/o University of Ulster
Cromore Road
COLERAINE
BT52 1SA

Annette Keogh
54 Millbank Avenue
PORTSTEWART

Mrs Edna Bell
Portballintrae Residents' Association
28 Seaport Avenue
PORTBALLINTRAE

Mrs I M Leacock
Coleraine Standing Conference of Women's
Organisations
127 Moycraig Road
Mosside
BALLYMONEY

Betty Linton
13 Clarence Court
COLERAINE

Mary Marshall
Friends of the Earth
25 Lower Captain Street
COLERAINE
BT51 3DT

Brenda McAteer
Causeway Early Years Team
Riverside House
28 Riverside Road
COLERAINE
BT52 1RN

Ms Lilian McCullough
Macosquin Senior Citizens' Club
38 Greenmount Road
COLERAINE

Mr N Monteith
Community Affairs Team
RUC Station
Lodge Road
COLERAINE

Sportsability Club
Tanya Nugent
c/o Pavestone Project
11 Brookgreen
COLERAINE
BT52 1QG

Mr C Quinn
44 Rodney Street
PORTRUSH

Ms Ann Rea
The Blind Centre
37 Abbey Street
COLERAINE
BT52 1EX

Mrs Jackie Ritchie
Friends of the Earth
232 Ballybogey Road
PORTRUSH
BT56 8NF

Sarah Powers
Coleraine Borough Churches Forum
13 Burnside Mews
PORTSTEWART
BT55 7BH

Viny Robinson
Association of Bahai Women
8 Kensington Manor
COLERAINE
BT52 1WD

Ms Avril Watson
The Women's Centre
23 Abbey Street
COLERAINE

School Aged Mothers' Project
Ballysally Community Centre
Ballysally Road
COLERAINE

Mrs Ann Nickle
Coleraine Rural & Urban Network
1b Waterside
COLERAINE
BT51 3DP

Patricia Shields
Mothers' Union
14 Knox Park
PORTRUSH
BT56 8LG

Aisling Kelly
Causeway Volunteer Stroke Scheme
9 Enterprise Parade
PORTSTEWART
BT55 7JZ

Ms Sheila Stewart
Compass Advocacy Group Ltd
12 Castlecroft
Main Street
BALLYMONEY
BT53 8LG

Florence Cooper
13 Ballywillan Road
PORTRUSH

Ms Rosie Stewart
Portrush Gingerbread
Dunluce Avenue
PORTRUSH

Colette Slevin
Mencap
PO Box 26
ANTRIM

6. Bodies recommended by the Equality Commission

The Equality Unit

N Ireland Human Rights Commission
(NIHRC)

N Ireland Statistics & Research Agency (NISRA)

Committee on the Administration of Justice

Women's Support Network

The Local Government Staff Commission for
N Ireland (LGSC)

The Rainbow Project

Women's Resource and Development
Agency (WRDA)

Coalition on Sexual Orientation (CoSo)

Royal National Institute for Deaf People (RNID NI)

Northern Ireland Council for Voluntary Action
(NICVA)

British Deaf Association

Age Concern Northern Ireland

Community Relations Council (CRC)

MENCAP (Royal Society for Mentally
Handicapped Children and Adults)

Indian Community Centre

Community Relations Training/Learning
Consortium

NSPCC	Fermanagh Women's Network
Help the Aged, Northern Ireland	North West Forum of People with Disabilities
Employers' Forum on Disability	Youth Council for Northern Ireland
Save the Children	Barnardos, Tuar Ceathea Project
Children's Law Centre	N Ireland Committee, Irish Congress of Trade Unions (NIC-ICTU)
Equality Forum NI	Omagh Women's Area Network
Royal National Institute for the Blind (RNIB N. Ireland)	Staff Commission for Education and Library Boards
Newry & Mourne Women	N Ireland Women's European Platform (NIWEP)
Child Care Northern Ireland	Rural Community Network
North West Forum of People with Disabilities	Equality Commission for Northern Ireland
Traveller Movement Northern Ireland	N Ireland Council for Ethnic Minorities (NICEM)
Carers National Association Northern Ireland	N Ireland Association for Mental Health
Northern Ireland Women's Aid Federation	Chinese Welfare Association
Gingerbread Northern Ireland	Multi-Cultural Resource Centre
Mid-Ulster Women's Network	Women's Information Group
Foyle Friend	Disability Action

APPENDIX 3

'RESPECT FOR THE DECEASED'

WE THE UNDERSIGNED: PETITION COLERAINE BOROUGH COUNCIL FOR EQUAL RIGHTS FOR ALL THE CITIZENS OF THE BOROUGH.

THE RIGHT TO HAVE OUR LOVED ONE'S LAST RESTING PLACE ON EARTH TREATED WITH RESPECT AND TO HAVE THE SAME RIGHTS AS ALL THE FAMILIES WHO HAVE LOVED ONES AND WHO ARE LIKELY TO HAVE LOVED ONES INTERNED IN COLERAINE CEMETERY.

THE RIGHT TO HAVE UNIFORMITY THROUGHOUT THE CEMETERY I.E. SURROUNDS ETC.

WE CALL ON THE COUNCIL TO CONSULT AND SEEK CONSENT AND AGREEMENT OF IT'S CITIZENS.

APPENDIX 4