

Impact Needs/Requirement Assessment Completion Form

Department: Environment and Neighbourhood Services	Person Responsible: Neil Davies
Service Area: Sports and Parks	Timescale for Equality Impact Assessment : 15 November 2012
Date: 13 November 2012	Completion date: 15 November 2012
Name of service/policy/procedure/project etc: Cemeteries Strategy	Is the service/policy/procedure/project etc: New <input checked="" type="checkbox"/> Old <input type="checkbox"/>
Predictive <input checked="" type="checkbox"/> Retrospective <input type="checkbox"/>	Adverse impact- Minor <input type="checkbox"/> Not found <input type="checkbox"/> Found – Generally positive impacts <input type="checkbox"/> Service/policy/procedure/project etc, amended to stop or reduce adverse impact Yes <input type="checkbox"/> No <input type="checkbox"/> The action plan and strategy includes the recommendations highlighted in section 15
Is there likely to be a differential impact on any group? Yes <input checked="" type="checkbox"/>	Please state below:
1. Grounds of race: Ethnicity, nationality or national origin e.g. people of different ethnic backgrounds including Gypsies and Travellers and Refugees/ Asylum Seekers Yes <input checked="" type="checkbox"/>	2. Grounds of gender: Sex, marital status, transgendered people and people with caring responsibilities No <input checked="" type="checkbox"/>
3. Grounds of disability: Physical or sensory impairment, mental disability or learning disability No <input checked="" type="checkbox"/>	4. Grounds of faith or belief: Religion/faith including people who do not have a religion Yes <input checked="" type="checkbox"/>

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<p>5. Grounds of sexual orientation: Lesbian, Gay and bisexual</p> <p>No <input checked="" type="checkbox"/></p>	<p>6. Grounds of age: Older people, children and young People</p> <p><input checked="" type="checkbox"/> No</p>
<p>Consultation conducted</p> <p>Yes <input checked="" type="checkbox"/></p>	
<p>Person responsible for arranging the review: Leslie Williams/Aine Ryan/Neil Davies</p>	<p>Person responsible for publishing results of Equality Impact Assessment: Neil Davies</p>
<p>Person responsible for monitoring: Neil Davies</p>	<p>Date results due to be published and where: 15 November on consultation portal</p>
<p>Signed: L.R Williams</p>	<p>Date: 12 November 2012</p>

Please note that you must complete this form if you are undertaking a formal Impact Needs/Requirement Assessment. You may also wish to use this form for guidance to undertake an initial assessment, please indicate.

1. What is the service/policy/procedure/project etc to be assessed?

Cemeteries Strategy

2. Briefly describe the aim of the service/policy etc? What needs or duties is it designed to meet? How does it differ from any existing services/ policies etc in this area

The aim of the Cemeteries Strategy is to review the provision of the Cemeteries service, with a particular emphasis on sustaining the supply of burial space to meet future demand, and potential improvements to the service. The Cemeteries Strategy is an enabling strategy and in itself does not make any significant changes to service delivery. The Strategy proposes options and techniques, particularly for increasing the provision for future burial space; and for other improvements to service delivery. These will require further investigation and where changes are proposed, these will be subject to detailed consideration and consultation as appropriate to the changes proposed.

Brent Council has powers, but not a duty, to provide cemeteries. The Council has powers, but not a duty to provide crematoria. As explained in the Strategy, and in this Equalities Impact Assessment, the Council for reasons of historic land use, provides cemeteries but not crematoria. There is adequate provision for crematoria in London and within reasonable distances of Brent. The remit of the Cemeteries Strategy and this Equalities Impact Assessment is concerned with the Cemeteries service. The Strategy also highlights that while the Council provides provision for burial, for commemoration and the associated green spaces, the Cemeteries service does not itself provide for cremation which is the choice of approximately three-quarters of Brent residents. Whilst that is outside of the remit of the Cemeteries Strategy it is a potential equalities issue and as such is considered in Appendix 1 to this Equalities Impact Assessment.

The aim of the Strategy is summarised in the Vision and Objectives below.

The vision of the strategy is **to meet the needs of bereaved people and the wider**

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community within the borough by:

- **Conducting the burial and commemoration of the dead of the diverse community in a secure, sustainable and well-maintained environment.**
- **Offering burial options at a choice of four cemeteries.**
- **Enabling local communities to access cemeteries as valuable historic green spaces which promote wellbeing, biodiversity, learning and recreation**

This vision will be achieved through the delivery of three key objectives.

1. **Meet current and future needs in respect of local burial options, while providing accessible green space and encouraging biodiversity and sustainable environmental practices.**
2. **Deliver a value for money cemeteries service that is at least self-financing.**
3. **Provide a supportive and inclusive service that fully reflects the religious, ethnic and cultural diversity of the borough and supports the wellbeing of bereaved people.**

Cemeteries in Brent

The existing cemeteries that the Borough manages are Alperton, Paddington Old and Willesden New are located within the borough while the Council owned and operated Carpenders Park Cemetery is located north of the borough within Three Rivers District Council's area. The four cemeteries represent a total of 43 hectares of green open space and, in addition, there are a further 3 to 4 hectares available for future use at Carpenders Park Cemetery.

There are also two old burial grounds at St. Mary's Church, Willesden and St. John's Church, Wembley that have not been used for burials since 1995 and 2002 respectively. The council maintains both these disused burial grounds and the churchyards adjoining them.

There is no new land at any of the three cemeteries within the borough itself. The only way that these cemeteries can provide 'new' graves is to use the space within existing graves or above existing graves, depending upon specific details. There is currently no grave space available at Paddington Cemetery (though some potential), while at current levels of use, reclaimed grave space at Alperton Cemetery will run out by 2018 and at Willesden New Cemetery by 2019. At current levels of use Carpenders Park Cemetery will have no further space for new graves from 2041, apart from in the area set aside for Shi'a Muslims.

None of the Brent cemeteries provide cremation facilities, nor are there any facilities for cremation located within the Borough itself, or known plans for crematoria within the Borough. There are however provision in neighbouring areas of London as summarised in Appendix 1 of the Equalities Impact Assessment.

Burial of cremated remains in purchased graves is currently possible at all Brent Cemeteries, and at St Mary's and St Johns churchyards dependent on space available within the graves. There are also dedicated areas for burial of cremated remains is currently possible at Carpenders Park Cemetery, Alperton Cemetery and at Willesden Cemetery. At Alperton Cemetery, a new section (GX) has recently been opened.

Brent Council does not allow the scattering of cremated remains in any of the Brent Cemeteries.

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Yes. The extent to which the aims, and the practice, are consistent with the Council's Comprehensive Equality Policy are analysed in this Equality Impact Assessment. The vision and objectives for Brent Cemeteries in meeting the needs of bereaved people are consistent with the Council's Comprehensive Equality Policy albeit cemeteries predominantly provide for burials whereas the majority of Brent residents opt for cremation and for some faiths cremation is a requirement. Approximately three-quarters (75%) of Brent residents seek either cremation (which is not provided by Brent nor otherwise provided within the London Borough of Brent area) or other interment provision beyond the Borough boundary. The historic and geographic reasons for this situation are explained in Appendix 1 of this Assessment.

Brent does provide for the burial of approximately 25% of Brent residents (based on those who died in 2011) within Brent cemeteries. This is relatively high for Greater London, for which burials represent an average of only 14% of all funerals.

There are some interment practices for which there is no provision within the UK and future provision is unlikely given current legislative and Planning constraints.

This Assessment and the Strategy consider some issues relating to limitations on the timing of burials within Brent's cemeteries. Currently there are circumstances for some faiths for whom the needs of bereaved people are only partially met within Brent, but for whom there is provision within an area around Brent.

4. Is there any evidence to suggest that this could affect some groups of people? Is there an adverse impact around race/gender/disability/faith/sexual orientation/health etc? What are the reasons for this adverse impact?

While the Cemeteries Strategy may have more relevance to users or potential users than of nonusers, there is no evidence that there will be an adverse impact around the protected characteristics.

In considering whether the evidence suggests that the cemeteries service could affect some groups of people, consideration needs to be given to the nine protected characteristics and against the different users of the cemeteries. Primarily the function of the cemeteries is the burial of the dead. Closely related to that are to facilitate any commemoration at the time of the burial, and subsequently. This may be in respect of the wishes of the deceased, for those who are bereaved, and later also for those who may have an interest e.g. genealogy. Cemeteries also provide a range of functions for visitors: both the bereaved and for the general public in the provision of open space for recreation, culture, landscape, biodiversity, and of other green space benefits. The Equalities Impact Assessment therefore considers the impacts on the needs of the deceased, the bereaved, and of visitors.

As explained in the sections above (and detailed in Appendix 1), Brent's cemeteries do not provide a cremation service, though there is provision elsewhere within London. In summary, and save for some interment practices for which there is no current nor likely provision within the UK, there is adequate provision for cremation within north-west London. Indeed, there is evidence that provision for burial even though used by only a quarter of Brent's population, and by an average of 14% of London's population, is more limited and in shorter supply than is the provision for crematoria. The options for future provision for burials are considered in detail in the strategy.

Scoping for the nine protected characteristics indicated that possible impacts should be considered on the grounds of religion or belief; ethnicity (primarily through religion or belief); age (as the provision of the service is generally more relevant to older sectors of the population); and of disability, and pregnancy or maternity in relation to access to cemeteries. The following sections consider impacts from the perspective of:

- The deceased
- The bereaved and commemoration

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- Visitors

The Deceased

Cemeteries provide for burial, interment of cremated remains, and for commemoration. In practical terms the provision is primarily for burial; and rather than for cremation that is not provided in Brent cemeteries. As detailed in Appendix 1 to this Equalities Impact Assessment the service is therefore more relevant to those religions where adherents seek burial, or in the case of non-affiliated individuals those who seek burial rather than cremation or other forms of interment. However, as also explained, there is no adverse impact, since there is provision for cremation and other interments within reasonable distance of Brent. And the cemeteries service that the Council does provide is via a power to provide, rather than a duty.

Ethnicity impacts are primarily evident via religion or belief, though in some cases there are ethnic differences evident within the main religious belief. Black Caribbean's of the Christian faith have a preference for burial; and Bangladeshi people prefer burial due to the predominance of Muslims, while Indians (Hindu or Sikh) prefer cremation.

In the year April 2011 to March 2012, Brent Cemeteries provided for 439 burials of which 363 were coffin burials of Brent residents, as compared with 1,471 deaths in Brent during the calendar year 2011. 23% of burials were those of people who had been resident outside of the Borough (and some interments will have been on cremated remains).

The amount of burial space available within Brent under different scenarios are provided in the main Cemeteries Strategy. In summary, the current population of the Borough (2011 Census) is 311,200. In recent years the birth rate in the Borough has been approximately three times that of the death rate, and whilst the number of deaths are expected to rise, projections of future demand will also be affected by immigration into, and migration out of the Borough, and that these are likely to differentially affect different age groups.

Interments and Brent's current population:

Brent Council, as local authority, is not legally obliged to provide new burial space, but it is obliged to maintain existing cemeteries in good condition.

The provision for burials as compared with other forms of interment within Brent has therefore been as a result of historic and land use factors. However, Brent's population now is of a diverse multi-cultural community. At the last Census for which data is available (2001), the proportion of Christians in the population was about 48%, a figure that is likely to have been lower by the time of the publication of the 2011 Census results. Whilst deaths occur disproportionately amongst older sectors of the population, the Brent population as a whole comprised (as at 2001): Hindu (17%), Muslim (12%), Jewish (2.5%), Sikh (1%), Buddhist (1%) and other (1%), in addition to 8% who did not state their faith and 10% of no religion. The 439 burials in Brent's cemeteries between April 2011 and March 2012 were represented by: Christian (74%: with Church of England burials accounting for 45%, Roman Catholic 27%, Greek Orthodox less than 1%, Jehovah's Witness less than 1%), Muslim (24%), Hindu (1.5%), Jewish (less than 1%), Rastafarian (less than 1%) and Humanist (less than 1%).

The provision of burial space into the future is considered by the Cemeteries Strategy. Muslims generally prefer single graves, though there are differences of approach between Sunni and Shia Muslims, and some are now adopting the practise of burying more than one family member in a grave. These considerations have implications for the amount of burial space that remains available. As detailed in the main part of the Cemeteries Strategy, there is space at current rates of use of 8 years from Sunni Muslims and 43 years for Shia Muslims. Any move away from single-burial graves, could extend this capacity. Findings from the consultation

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show that In view of the lack of new ground at three cemeteries, Muslim people would consider the use of depth remaining above old interments for new burials. However, this would need to be available in areas exclusively for Muslim burial and the orientation of graves would need to comply to requirements. It is therefore proposed in the strategy that further consultation should be undertaken with members of the Muslim community on options for double depth burials and for using space remaining above old interments for new burials.

The concrete burial vaults in Willesden New Cemetery and Paddington Cemetery appear to be popular with black Caribbean people.

Not all faiths however opt for burial. In addition to the majority of Christians who opt for cremation (for reasons of preference, practicality or economy), cremation is generally required by Hindus and Sikhs, and permitted for Buddhists and Liberal Jews. Locally Hindus may use burial in the case of children. The Cemeteries service does not however provide for the majority of the population, - who seek cremation; and not at all for Hindus and Sikhs who comprise respectively 17% and 1% of the Brent population. Others that are not provided for within Brent are Zoroastrians. As explained above and in Appendix 1, the Cemeteries service provides for burial while adequate provision for cremation is available in London.

Provision for other forms of interment:

Within the broad range of practicalities, no one is denied a suitable resting place for their remains. (Even those who die without contactable next of kin are provided for, via Brent Council's Housing & Community Care under section 46 of the Public Health Act). And whilst for reasons of history, the legislative position of the established Church (of England) and space, burial is the service provided by Brent Cemeteries, there is provision and choice of provision on a scale wider than the Borough. Crematoria are located near to Brent at Golders Green, Hendon, Islington, Kensal Green, Mortlake, Ruislip and St Marylebone crematoria; some local authority and some private sector. Jewish Cemeteries are located both within the Borough and in nearby London localities and at Bushey. Nor are Brent residents confined to Brent in seeking a burial location. The private sector can also meet the needs of those who may wish to be repatriated to other countries. In many respects the service is a paying service, and fees are within the range of services offered by other public sector and private providers. There is therefore a market, with some choices, and residents are not compelled to use, or depend upon, the Brent service.

For some faiths, particularly Muslim, there is a time factor involved in the need to arrange a funeral and burial on the same day or within 24 hours of the death. Generally, Brent Cemeteries provide for funerals on weekdays, with the last funeral of the day commencing at about 2.30pm. To meet their needs, Muslims may require a burial later than this, or on non - weekdays. Burials on Saturdays are provided at Carpenders Park Cemetery and at no extra cost. At other Brent cemeteries, Saturday burials are possible but subject to an additional £550 cost. Burials are not available late on weekday afternoons, during the evenings, on Sundays, or on Bank Holidays. During the darker months of the year there are Health and Safety issues which would make burial late in the day difficult. However, demand does exist for light-time afternoon, evening, Saturday, Sunday and public holiday provision, which is not currently provided. These issues have been raised in the Strategy for future detailed consideration. Obviously, there are costs, in some cases a significant premium that would need to be met by the customer. Note that there is unlikely to be much demand from Christians including Roman Catholics for such services for whom funerals can be delayed, while neither officiants nor funeral directors are likely to be available out of hours.

Funeral services may be held at the graveside, while the cemetery chapel at Alperton Cemetery can also be used for services. The chapel at Paddington Cemetery is currently out of use.

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Whilst Brent Cemeteries do not provide for cremation, some people, and the bereaved, may wish to inter the cremated remains within suitable places that may include cemeteries. Brent Cemeteries do provide for the interment of cremated remains, and choices include within existing graves where appropriate; and in other cases in dedicated areas at Willesden, and Carpenders Park Cemeteries. Dedicated areas include memorial trees with provision for eight interments. Though it is not currently marketed there is potential space in the Columbarium at Alperton. While this is raised here, the demand for the interment of cremated remains is not expected to be high as anecdotal evidence suggests that most people will make arrangements for the deposit of cremated remains either near to the cremation or at locations of their choice. Hindus in particular are unlikely to deposit cremated remains in Brent cemeteries.

As was stated earlier, the central function of the cemeteries is for the burial of the dead, but even for those who opt for burial, particularly Christians and Muslims, much of the funeral ceremony may be undertaken at venues other than the cemetery.

The wishes of the deceased will in many cases be taken into account by those arranging the funeral and often these will be family of the same faith. However, in addition to the wishes of the deceased, the bereaved may have particular reasons to seek a local burial or interment. Where the deceased had close connections with the Brent area, or where the bereaved may continue to do so, or where the bereaved may have mobility issues due to for example disability and/or cost, there may be over-riding reasons for seeking a local interment.

The Bereaved

Provision for the bereaved includes:

- Whether the interment of their deceased is provided for by Brent Cemeteries.
- Whether commemoration of the deceased is provided for by Brent Cemeteries.
- And whether the reasonable needs of the bereaved are provided for.

The issue of the interment of the deceased has primarily been considered earlier in this Equalities Impact Assessment in relation to burials, and the interment of cremated remains.

Information on a variety of cemetery services is provided on the Brent Council website at; and while not fully comprehensive, further information is available from the cemeteries team:

<http://www.brent.gov.uk/cemetery.nsf/Cemeteries/LBB-10>

The strategy recommends that this information and the media used should be reviewed.

Commemoration:

Commemoration of the deceased in Brent Cemeteries is most evident in relation to burials, though plaques can be provided in relation to the memorial trees and in the Columbarium. Faiths vary in their need for physical commemoration (for example, stone memorials) and there are also wide variations in individual preferences.

Provision to commemorate those who are neither buried nor have cremated remains interred within Brent Cemeteries include memorial trees, a memorial rose garden outside the Chapel at Alperton Cemetery (now fully used). Memorial benches may also be purchased. There are no books of remembrance as such, nor an internet version. However, information technology has provided people with a versatile media to construct online commemoration if they so desire.

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The practical needs of the bereaved include provision of facilities. Each of the following are provided at each Brent cemetery: car parking, signage and notice boards, seating, toilets, water taps and waste bins. The condition of these and their adequacy are considered as part of the main strategy. In particular the provision of car parking, signage, seating, and of toilets may be particularly relevant to some of the old and young, disabled, pregnant or maternal.

Note here also that comment has been raised about the greeting of funerals upon arrival and their direction to the graveside. It is customary for funerals to be met upon arrival by appropriate officers or staff both to collect legal paperwork, but also to direct mourners to the correct graveside. Recent arrangements for meeting the funeral are considered to be less formal than previously and with an increased risk of mis-directing mourners within the cemetery and/or reducing the dignity of the occasion, though this is now being reviewed operationally. No differential in this risk is evident now, but if the risk were to materialise, it could be perceived differently. This is an issue that is currently being considered by the cemeteries service.

Cemeteries are open at times that vary between 9am to 4pm in the winter; and from 9am to 8pm in the summer.

Visitors

While visitors are more likely to have an interest in visiting if a family member or acquaintance is buried, in a cemetery, all of Brent's cemeteries (and the two maintained churchyards) are open to everyone of all religions or faiths. These areas also have important open space functions, providing for informal recreation, cultural history, landscaping, wildlife, and for other functions.

The practical needs of visitors include provision of facilities. Each of the following are provided at each Brent cemetery: car parking, signage and notice boards, seating, toilets, water taps and waste bins. This provision is aimed at providing for the needs of visitors, to enable access to and use of the cemetery by visitors of different abilities and disabilities. The condition of these and their adequacy are considered as part of the main Cemeteries strategy. In particular the provision of car parking, signage, seating, and of toilets may be particularly relevant to some of the old and young, disabled, pregnant and maternal. The cemeteries are open at times that correspond to seasonal daylight.

5. Please describe the evidence you have used to make your judgement. What existing data for example (qualitative or quantitative) have you used to form your judgement? Please supply us with the evidence you used to make your judgement separately (by race, gender and disability etc).

A range of sources of evidence were used including data from Brent Council's cemeteries service which is summarised in the Cemeteries Strategy and Appendices. A range of other sources of information were also used, including the following:

- Draft of the Cemeteries Strategy, and Appendices
- Census data (2001 Census, 2011 Census where available)
- Interviews with Sports and Parks staff (including operations, registration and booking and memorials)
- Brent Council guidance publications, and other publications on religious faiths.
- Consultation findings from the two stage consultation
- Leeds City Council, Equality, Diversity, Cohesion and Integration Impact Assessment, 2011.

6. Are there any unmet needs/requirements that can be identified that affect specific groups? (Please refer to provisions of the Disability Discrimination Act and the regulations on sexual orientation and faith, Age regulations/legislation if applicable)

As detailed in the sections above, the Cemeteries and cemetery service primarily provide for

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burials, for historic reasons of religion, legislation, and land use. The current religious and demographic composition of the Borough's population differs markedly from that at the time that the cemeteries were created. And the future needs of the population is likely to reflect rapidly changing demographics and this issue of uncertainty is considered by the Cemeteries Strategy. Provision for cremation is considered in Appendix 1.

There are however some unmet needs / requirements that can be identified by this Equalities Impact Assessment that affect specific groups:

- Muslims who may require burial on the same day or within twenty-four hours are restricted in that burial start times are not accepted if they commence after 2.30pm in the afternoon. Saturday burials are accepted only at Carpenders Parks within the standard fees; though Saturday burials can be arranged at other Brent cemeteries for an additional premium of £550. Burials are not accepted at any Brent cemetery on Sundays or Public Holidays. Whilst there would be cost implications of providing for these times, it is thought that the customers would be prepared to pay if the service was provided. Currently they may pay for services outside of the Borough when Brent services are not available. Consideration could be given as to whether these needs could be met.
- Opening times: Consider whether opening times could be extended for Muslims, or others, who may wish to visit cemeteries before 9am in the mornings or in the evenings. Note however, that issues of security, and health and safety that may limit opening to daylight hours. There would however be cost and resource implications, with little chance of any additional income.
- The majority of Brent residents, and all of some faiths, have opportunity to deposit cremated remains within the Borough in which they would have lived. However, the demand is not considered to be high in practice, and at current rates can be met.
- Similarly, there appears to be limited provision for the commemoration of the majority of Brent residents, particularly those of some faiths, who are neither buried in the Borough, nor have cremated remains interred in Brent cemeteries. The demand however is not considered to be high in practice.

7. Have you consulted externally as part of your assessment? Who have you consulted with? What methods did you use? What have you done with the results i.e. how do you intend to use the information gathered as part of the consultation?

The strategy was developed following a detailed analysis of how Brent's cemetery service currently operates, including levels of demand and the availability of burial space. A benchmarking exercise was undertaken to provide a range of comparative data with other London boroughs and a comprehensive two stage consultation process was undertaken to inform the production of the strategy.

To inform the draft strategy the first consultation stage was undertaken through a survey of recently bereaved people and a series of meetings with council officers, funeral directors and other key stakeholders.

Over 120 questionnaire responses were received from people who had been recently bereaved. The survey results supplied usage data, e.g. frequency and pattern of visits to cemeteries, and customer satisfaction scores. A large majority of respondents agreed that cemeteries are well maintained and safe places to visit. Areas sited for improvement included grave maintenance, grass cutting and signage. Almost a third of respondents expressed an interest in being part of a "Friends of the Cemetery" and provided their contact details.

Consultation meetings were held with stakeholders identified as having a key role to play in the development of food growing provision in the borough:

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- Brent Council service areas – Sports and Parks (including operational managers and officers, grounds maintenance staff, registration and booking officers), Safer Streets and Planning.
- Funeral directors, Officiants and Memorial Masons
- Administrator of Hendon Mosque and stakeholders at Carpenders Park Cemetery.

The findings from the first stage of the consultation process directly informed the draft strategy and draft action plan which went out to public and stakeholder consultation from 2nd July to 29th September 2012. This consultation was undertaken through:

- An online questionnaire with paper copies available on request
- Officer attendance at all five Area Consultative Forums and three Service User Consultative Forums
- Officer attendance at a committee meeting of the Brent Multi Faith Forum.
- Officer attendance at a Funeral Liaison Meeting
- Consultation documentation available at libraries, sports centres and Brent Contact Points
- Notification letters distributed to a sample of 500 people who had buried relatives in a Brent cemetery.
- Coverage in the Brent Magazine and the local press.

Approximately 320 people attended one of the meetings where the draft strategy was discussed and 45 people completed a questionnaire. The latter number was lower than anticipated but it is reasonable to conclude that this was a consequence of having undertaken a first stage consultation process. An average of 82% of respondents agreed or strongly agreed with the draft vision, individual objectives and action plan. 71 additional comments were submitted by 20 of the respondents. Where relevant and appropriate the strategy and action plan have been revised to reflect the feedback received.

Key Findings

From the background research and two stage consultation process it has been possible to identify a number of headline findings which have influenced the vision, three objectives and action plan priorities. These include:

- Burial space could cease to be available in any of Brent's cemeteries by as early as 2030 if no action is taken. However, a number of options are available to ensure the provision of space beyond this date
- Individual management plans should be produced for each cemetery to include provision of future burial space, grounds maintenance and asset management
- A five to ten year rolling programme should be implemented for the reclamation of burial space in old purchased graves where the exclusive rights of burial have been extinguished
- Options should be explored for the creation of burial space at Willesden and Paddington cemeteries through mounding and the provision of burial vaults
- Council officers should put mechanisms in place to communicate available burial options more clearly to funeral directors on a continuous basis
- Consideration should be given to providing more flexibility with regard to funeral times, particularly for evenings and weekends
- Further consultation should be undertaken with members of the Muslim community on possible alternatives to single depth burials to ensure the continued availability of burial space within Muslim sections
- Friends of Groups should be set up for each cemetery and council officers should attend

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Funeral Director Liaison meetings on a six monthly basis

- The recommendations of an operational service review should be implemented, particularly with regard to the administration of records, online payments and memorial testing
- Contingency plans should be reviewed with regard to arrangements for excess deaths, e.g. as a result of a pandemic
- The wider benefits of cemeteries as recreational green spaces of historical and cultural values should be promoted through a programme of community engagement
- Cemeteries have a valuable part to play in increasing the biodiversity of the borough which can be further encouraged through the employment of greener management methods.

A detailed listing of all consultation feedback is available on the council's Consultation Portal

<http://brent-consult.objective.co.uk/portal> and the consultation report is available as Appendix 3 with the Cemeteries Strategy.

8. Have you published the results of the consultation, if so where?

Results of the stakeholder consultation have been included in the draft Cemeteries Strategy. Publication of the results of the consultation on the draft Cemeteries Strategy will be published in accordance with Brent Council standards; and in the final Cemeteries Strategy.

9. Is there a public concern (in the media etc) that this function or policy is being operated in a discriminatory manner?

No.

10. If in your judgement, the proposed service/policy etc does have an adverse impact, can that impact be justified? You need to think about whether the proposed service/policy etc will have a positive or negative effect on the promotion of equality of opportunity, if it will help eliminate discrimination in any way, or encourage or hinder community relations.

The Strategy makes a number of recommendations for changes; particularly in relation to sustaining burial space which is currently limited and for improvements to service delivery. Several of these will require further investigation of their feasibility and where appropriate these will be subject to specific consultation and assessment.

Consideration of the provision for funerals after 2.30pm, and where daylight practically enabled that, could have a positive impact on the promotion of equality of opportunity for all, and for those of some religions and faiths in particular.

Reviewing opening hours with a view to extending opening within daylight hours for cemeteries could benefit all visitors and those of some religions in particular.

Reviewing of the provision for the deposit or interment of cremated remains.

Reviewing the provision for the commemoration for Brent residents who have been cremated or otherwise interred elsewhere.

All of the aforementioned issues have been covered in the strategy and action plan.

11. If the impact cannot be justified, how do you intend to deal with it?

Where services are not provided by the Council, they can be sourced from either other local authority areas or from the private sector.

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12. What can be done to improve access to/take up of services?

See section 6, above.

13. What is the justification for taking these measures?

Refer to sections above.

14. Please provide us with separate evidence of how you intend to monitor in the future. Please give the name of the person who will be responsible for this on the front page.

Monitoring of the Equalities Impact Assessment in the first year following the Cemeteries Strategy has been programmed into the work of the Strategy and Service Development Team, Sports and Parks Service, Environment and Neighbourhoods. The Cemeteries Strategy will consider the longer-term arrangements for monitoring.

15. What are your recommendations based on the conclusions and comments of this assessment?

Recommendations

- Review the possible extension of the start time of funerals beyond 2.30pm at times of the year when daylight practically enables an extension. This could be self-financing. This issue is addressed in the strategy and in 1.6 of action plan.
- Opening times: Consider whether opening times could be extended for Muslims, or others, who may wish to visit cemeteries before 9am in the mornings or in the evenings. Note however, that issues of security, and health and safety may limit opening to daylight hours. Extension of opening times would have cost implications but with little opportunity to raise any additional income. This issue is addressed in strategy and in the action plan
- Review the services available for the deposit or interment of the cremated remains of those (the majority of residents), particularly of some faiths, who are cremated outside of the Borough boundaries. Currently demand for this service is in line with the ability of the Cemetery Service to provide space. This may include, but is not limited to, the marketing of the Columbarium at Alperton Cemetery for the interment of cremated remains. This issue is addressed in the strategy and action plan.
- Undertake consultation with key stakeholders from the Muslim community regarding options for future burial provision at Carpenders Park and Paddington Old Cemetery. This issue is addressed in the strategy and action plan.
- Review the services available for commemoration, particularly of those who are neither buried in, nor have cremated remains interred in Brent cemeteries. Consider both physical commemoration, books and internet commemoration and in relation to 'family-history' and tracing web services. Demand is expected to be low.

Should you:

1. Take any immediate action? Yes, consideration as part of the Cemeteries internal review; as part of the consultation, and of the Cemeteries Strategy.
2. Develop equality objectives and targets based on the conclusions?
3. Carry out further research? Yes

16. If equality objectives and targets need to be developed, please list them here.

Any equality objectives and targets will be developed as part of the Strategy.

Impact Needs/Requirement Assessment Completion Form

17. What will your resource allocation for action comprise of?

Currently, officer time within the Strategy and Service Development team, and the Sports and Parks Service of Environment and Neighbourhood Services.

If you need more space for any of your answers please continue on a separate sheet

Signed by the manager undertaking the assessment:

Full name (in capitals please):

Date: 13 November 2012

LESLIE WILLIAMS

Service Area and position in the council:

Strategy and Service Development Officer, Sports and Parks, Environment and Neighbourhood Services

Details of others involved in the assessment - auditing team/peer review:

Neil Davies, Strategy and Service Development Team, Sports Service.

Paul Hutchinson, Sports and Parks Service

Once you have completed this form, please take a copy and send it to: **The Corporate Diversity Team, Room 5 Brent Town Hall, Forty Lane, Wembley, Middlesex HA9 9HD**