

Appendix 1 Equality Screening Form

Policy Scoping

Policy Title:  Draft Armagh City Banbridge and Craigavon Borough Council Cemetery Strategy 

Brief Description of Policy (please attach copy if available). Please state if it is a new, existing or amended policy.

The Cemetery Strategy outlines all aspects of cemetery provision within the Council area including the Council Rules and Regulations for Cemeteries. It includes details of the legal requirements the Council must comply with relating to Cemetery provision. It outlines the administration and operational aspects of cemetery provision across the Council. It also identifies the short, medium and longer term needs in terms of cemetery space. The strategy is aligned with the Corporate and Community Plan. The plan recognises the need to continually review and monitor the Council and regional demographics which may have an impact on future cemetery provision.

Intended aims/outcomes. What is the policy trying to achieve?

To ensure that the short, medium and long-term Cemetery needs of residents are met.

Policy Framework

Has the policy been developed in response to statutory requirements, legal advice or on the basis of any other professional advice? Does this affect the discretion available to The Council to amend the policy?

Council's cemetery functions are governed by legislation and informed by industry best-practice. Council aims to ensure that cemeteries are managed to a consistently high standard in accordance with burial laws, industry standards, Council policy and health and safety laws. Council aims to provide a cemetery service which delivers on behalf of all Borough residents, taking cognisance of different cultural and religious needs of the deceased and their families.

The draft Cemetery Strategy has been developed to reflect the legal requirements set out in the following legislation –

- Public Health (Ireland) Act 1878 Part 111
- Local Government (Miscellaneous Provisions) (NI) Order 1985
- The Burial Grounds Regulations (NI) 1992
- The Welfare Services Act (NI) 1971 and amended under Personal Social Services (N) Order 1972
- Health & Safety and Work Order (NI) 1978
- The Management of Health & Safety at Work Regulations (NI) 2000

Are there any Section 75 categories which might be expected to benefit from the policy? If so, please outline.

This cemetery service is provided for all borough residents from all s. 75 groups and takes into account the different cultural and religious needs of the deceased and their families.

Who initiated or wrote the policy (if The Council decision, please state). Who is responsible for implementing the policy?

Who initiated or wrote the policy?	Claire Duddy, Head of Climate, Sustainability and Parks
Who is responsible for implementation?	The Cemetery Service

Are there any factors which might contribute to or detract from the implementation of the policy (e.g. financial, legislative, other)?

Financial – cost of securing burial space and developing cemeteries/cemetery extensions.
Legal – changes in burial law. Other factors – planning implications, shortage of church burial spaces, changing demographics/population increases, price changes and other factors in neighbouring councils.

Main stakeholders in relation to the policy

Please list main stakeholders affected by the policy (Tick all that apply)

Staff ☒

Customers ☒ (residents and non-residents)

Other Statutory Bodies ☐

Community or Voluntary Sector ☐

Private sector ☒ Funeral directors, monumental masons

Other Clergy, Elected Members

Are there any other policies with a bearing on this policy? If so, please identify them and how they impact on this policy.

Draft Cemetery Management Rules and Regulations document

Available Evidence

The Council should ensure that its screening decisions are informed by relevant data. What evidence/information (both qualitative and quantitative) have you gathered to inform this policy? Specify details for each of the Section 75 categories. For up to date [S75 Borough Statistics](#)

Section 75 category	Evidence
Religious belief	43.8% of residents in the borough on Census Day 2021 belong to or were brought up in the Catholic religion and 46.7% belong to or were brought up in a Protestant and Other Christian (including Christian related) religion. A further 1.2% belonged to or had been brought up in other religions while 8.2% neither belonged to, nor had been brought up in a religion. Comment – no discrimination on grounds of religious belief. Policy will accommodate shorter turn around for Muslim burials, which may impact others seeking shorter notice period. No complaints received to date on application of cemetery policy on the basis of religious belief.
Political opinion	Armagh City, Banbridge and Craigavon Borough Council has 41 elected members. A breakdown of results of the Local Government Election in May 2023 for the borough are as follows: • Democratic Unionist Party – 13 • Ulster Unionist Party – 6 • Sinn Fein – 15 • Social Democratic and Labour Party – 1

	• Alliance – 4 • Independent – 1 • TUV – 1 A total of 87,684 votes were polled in the borough from an eligible electorate of 155,625 giving an overall turnout of 56.34%. This breakdown is taken as an approximate representation of the political opinion of people within the borough. Comment – no reason to believe that there would be any discrimination on the basis of political opinion. No complaints received on this basis.																																										
Racial group	Results from the 2021 Census showed that 96.7% of the usually resident population of the borough were white and 3.3% were from minority ethnic groups. The main ethnic minorities were Mixed (1,652 individuals), Black African (1,132 individuals) and Chinese (683 individuals). <table><tr><td></td><td>Armagh City, Banbridge and Craigavon</td><td>%</td></tr><tr><td>White</td><td>211,429</td><td>96.69%</td></tr><tr><td>Irish Traveller</td><td>534</td><td>0.24%</td></tr><tr><td>Roma</td><td>205</td><td>0.09%</td></tr><tr><td>Indian</td><td>617</td><td>0.28%</td></tr><tr><td>Chinese</td><td>683</td><td>0.31%</td></tr><tr><td>Filipino</td><td>406</td><td>0.19%</td></tr><tr><td>Pakistani</td><td>278</td><td>0.13%</td></tr><tr><td>Arab</td><td>116</td><td>0.05%</td></tr><tr><td>Other Asian</td><td>581</td><td>0.27%</td></tr><tr><td>Black African</td><td>1,132</td><td>0.52%</td></tr><tr><td>Black Other</td><td>519</td><td>0.24%</td></tr><tr><td>Mixed</td><td>1,652</td><td>0.76%</td></tr><tr><td>Other ethnicities</td><td>506</td><td>0.23%</td></tr></table> <i>Table 2: Ethnic group of residents in Armagh City, Banbridge and Craigavon Borough. Source: Table: MS-B01 Ethnic Group, Census 2021, NISRA.</i> Results from the 2021 Census show that 85.5% of residents in the borough were born in Northern Ireland. The borough had 8.6% of residents, or 18,836 individuals, who were born outside the United Kingdom or Republic of Ireland Results from Census 2021 show that 6.8% of residents in the borough aged 3+ years (14,376 individuals) spoke a language other than English as their main language. In Armagh City, Banbridge and Craigavon borough in 2021, the most prevalent main languages other than English were Polish (1.7%) and Lithuanian (1.2%). Comment – no reason to believe that there would be any discrimination on the basis of race. No complaints received on this basis. Issues have been identified regarding commemoration traditions within the Irish Traveller community being at odds with		Armagh City, Banbridge and Craigavon	%	White	211,429	96.69%	Irish Traveller	534	0.24%	Roma	205	0.09%	Indian	617	0.28%	Chinese	683	0.31%	Filipino	406	0.19%	Pakistani	278	0.13%	Arab	116	0.05%	Other Asian	581	0.27%	Black African	1,132	0.52%	Black Other	519	0.24%	Mixed	1,652	0.76%	Other ethnicities	506	0.23%
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	Council policy. Efforts will be made to engage with this community at the consultation stage.																					
Age	The population of the borough was estimated to be 218,656 on Census Day 2021, the profile of which is shown below <table><tr><th>Age Group</th><th>Armagh City, Banbridge and Craigavon</th><th>%</th></tr><tr><td>0 – 15 years</td><td>48,243</td><td>22.06%</td></tr><tr><td>16 – 24 years</td><td>21,774</td><td>9.96%</td></tr><tr><td>25 – 49 years</td><td>72,023</td><td>32.94%</td></tr><tr><td>50 – 64 years</td><td>41,626</td><td>19.04%</td></tr><tr><td>65 and over</td><td>34,990</td><td>16.0%</td></tr><tr><td>Total</td><td>218,656</td><td>100.0%</td></tr></table> <i>Table 5: Age profile of Armagh City, Banbridge and Craigavon Borough at Census Day 2021. Source: Table MS-A06 Age Structure, Census 2021</i> Comment - no reason to believe that there would be any discrimination on the basis of political opinion. No complaints received on this basis. Council previously permitted the older residents who met key criteria to pre-purchase plots. This option was removed in early 2025 due to several cemeteries having limited plots remaining. No complaints received in this respect.	Age Group	Armagh City, Banbridge and Craigavon	%	0 – 15 years	48,243	22.06%	16 – 24 years	21,774	9.96%	25 – 49 years	72,023	32.94%	50 – 64 years	41,626	19.04%	65 and over	34,990	16.0%	Total	218,656	100.0%
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Marital status	The 2021 Census provides information on the marital and civil partnership status of those aged 16 and over. Almost half of residents aged 16+ in the borough were married (49.0%). Comment – no reason to believe that there would be any discrimination on the basis of marital status.																					
Sexual orientation	Just 1.5% of the population aged 16 and over in the borough identified as lesbian, gay, bisexual or other (LGB+) while 90.5% identified as straight or heterosexual and 8% did not provide an answer to the question. Comment – there is no reason to believe that there would be discrimination on the grounds of sexual orientation. No complaints received.																					
Men and women generally	The 2021 Census showed that in Armagh City, Banbridge and Craigavon Borough 49.5% (108,268) of usual residents were male and 50.5% (110,388) were female. Comment - No reason to believe that there would be discrimination on the grounds of men and women generally. No complaints received on this basis.																					

Disability	According to the 2021 Census, more than one in five people in the borough (22% or 48,726 individuals) had a limiting long-term health problem or disability. Comment - Cemeteries (new and extensions) are made as accessible as possible, with the exception of older sites where there isn't generally adequate space to do so. Lawn cemeteries are typically more accessible than traditional surround cemeteries. One enquiry has been received regarding chair access from the first entrance gates at Kernan Cemetery. This will be reviewed as part of any additional works at the site.
Dependants	The 2021 Census showed that 32% or 27,192 households in the borough contained dependent children. Comment – No reason to believe that there is any discrimination on the grounds of dependants and no complaints received on this basis.

Needs, experiences and priorities

Taking into account the information gathered above, what are the different needs, experiences and priorities of each of the following categories in relation to this particular policy/decision?

Section 75 category	Needs, experiences and priorities
Religious belief	Muslim burials are required to take place within 24 hours.
Political opinion	N/A
Racial group	Irish Travellers may observe specific cultural traditions e.g. larger headstones than typically permitted under Council policy. Graves may be visited on a daily basis for up to 1 year (especially if the death was sudden and/or involved a young person). Family may install a bench for visiting relatives to sit upon. Graves are well-kept and may have adornments added, e.g. candles, statues, photos, toys, themed wreaths or a 'vacant chair'.
Age	N/A
Marital status	N/A
Sexual orientation	N/A
Men and women generally	N/A

Disability	New cemeteries and extensions are DDA-compliant. Older, traditional cemeteries are typically less accessible.
Dependants	N/A

Screening Questions

1. What is the likely impact on equality of opportunity for those affected by this policy for each of the Section 75 categories?

Category	Policy Impact	Level of impact (Major/minor/none)
Religious belief		None
Political opinion		None
Racial group		None
Age		None
Marital status		None
Sexual orientation		None
Men and women generally		None
Disability		None
Dependants		None

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

Category	If yes, provide details	If no, provide reasons
Religious belief		Council's Cemetery Service caters for all sections of the community. Council does not currently offer a crematorium as a means of disposing of the dead. Some religions are pro-cremation (Hinduism and Buddhism) as a means of disposal, whilst others forbid

		it (Islam and Orthodox Judaism).
Political opinion		Council's Cemetery Service caters for all sections of the community
Racial group		Council's Cemetery Service caters for all sections of the community
Age		Council's Cemetery Service caters for all sections of the community
Marital status		Council's Cemetery Service caters for all sections of the community
Sexual orientation		Council's Cemetery Service caters for all sections of the community
Men and women generally		Council's Cemetery Service caters for all sections of the community
Disability		Council's Cemetery Service caters for all sections of the community
Dependants		Council's Cemetery Service caters for all sections of the community

3. To what extent is the policy likely to impact on good relations between people of different religious belief, political opinion, or racial group?

Category	Details of Policy Impact	Level of impact (major/minor/none)
Religious belief	Greater awareness of the diverse needs of different religious groups in the Borough. Greater emphasis on ensuring that the needs of	Major ☐ Minor ☒ positive None ☐

	these groups will be met as we develop new cemeteries, create new extensions and consider the feasibility of a crematorium in the Borough.	
Political opinion		Major ☐ Minor ☐ None ☒
Racial group	Greater awareness of the diverse needs of different racial groups in the Borough. Greater emphasis on ensuring that the needs of these groups will be met as we develop new cemeteries, create new extensions and consider the feasibility of a crematorium in the Borough.	Major ☐ Minor ☒ positive None ☐

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

Category	If yes, provide details	If no, provide reasons
Religious belief	ABC Cemeteries will be promoted as shared spaces to be enjoyed by all religions and none.	
Political opinion	ABC Cemeteries will be promoted as shared spaces to be enjoyed by all residents, regardless of political opinion.	
Racial group	ABC Cemeteries will be promoted as shared spaces to be enjoyed by all races.	

Multiple Identity

Generally speaking, people fall into more than one Section 75 category (for example: disabled minority ethnic people; disabled women; young Protestant men; young lesbian, gay and bisexual people). Provide details of data on the impact of the policy on people with multiple identities. Specify relevant s75 categories concerned.

Council recognises that no one individual sits exclusively within one s75 group, e.g. older residents using our cemetery service may have a disability. Council's Cemetery Service is there to serve all sections of the community, regardless of any s75 category/categories that they may belong to.

Disability Discrimination (NI) Order 2006

Is there an opportunity for the policy to promote positive attitudes towards disabled people?

New cemeteries and extensions to existing cemeteries are DDA-compliant.

Is there an opportunity for the policy to encourage participation by disabled people in public life?

Yes ☐ No ☒

Please explain

There are no specific opportunities within the document to encourage participation by disabled people.

Screening Decision

A: NO IMPACT IDENTIFIED ON ANY CATEGORY – EQIA UNNECESSARY

Please identify reasons for this below

N/A

B: MINOR IMPACT IDENTIFIED – EQIA NOT CONSIDERED NECESSARY AS IMPACT CAN BE ELIMINATED OR MITIGATED

Where the impact is likely to be minor, you should consider if the policy can be mitigated, or an alternative policy introduced. If so, an EQIA may not be considered necessary. You must indicate the reasons for this decision below, together with details of measures to mitigate the adverse impact or the alternative policy proposed.

This strategy identifies the short, medium and longer term needs in terms of cemetery space. This cemetery service is provided for all borough residents from all s. 75 groups and takes into account the different cultural and religious needs of the deceased and their families. Accessibility is factored into the design process for new cemeteries and extensions to existing cemeteries. Lawn cemeteries are typically more accessible than traditional surround cemeteries. The Strategy has identified minor positive impacts for some s75 communities and therefore a full equality impact assessment is not required. The plan recognises the need to continually review and monitor the Council and regional demographics which may have an impact on future cemetery provision.

C: MAJOR IMPACT IDENTIFIED – EQIA REQUIRED

If the decision is to conduct an equality impact assessment, please provide details of the reasons.

N/A

Timetabling and Prioritising

If the policy has been screened in for equality impact assessment, please answer the following questions to determine its priority for timetabling the equality impact assessment.

On a scale of 1-3 with 1 being the lowest priority and 3 being the highest, assess the policy in terms of its priority for equality impact assessment.

Policy Criterion

Rating (1-3)

Effect on equality of opportunity and good relations

Social need

Effect on people's daily lives

The total rating score should be used to prioritise the policy in rank order with other policies screened in for equality impact assessment. This list of priorities will assist the Council in timetabling its EQIAs.

Is the policy affected by timetables established by other relevant public authorities? If yes, please give details.

Yes ☐ If yes give details *Click or tap here to enter text.*

No ☐

Monitoring

Effective monitoring will help the authority identify any future adverse impact arising from the policy. It is recommended that where a policy has been amended or an alternative policy introduced to mitigate adverse impact, monitoring be undertaken on a broader basis to identify any impact (positive or adverse).

Further information on monitoring is available in the Equality Commission's guidance on monitoring (www.equalityni.org).

Identify how the impact of the policy is to be monitored

The Cemetery Manager will monitor the usage rates by the various sections of the community and will record, monitor and address any complaints received.

Approval and Authorisation

A copy of the screening form for each policy screened should be signed off by the senior manager responsible for that policy. The screening recommendation should be reported to the relevant Committee/The Council when the policy is submitted for approval.

Screened by	Position/Job title	Date
Martin McCorry	Cemetery Manager	12/08/2025

Approved by	Position/Job Title	Date
Claire Duddy	Head of Climate, Sustainability and Parks	12/08/2025

Please forward a copy of the completed policy and form to:

Equality@armaghbanbridgecraigavon.gov.uk

who will ensure these are made available on the Council's website.

The above officer is also responsible for issuing reports on a quarterly basis on those policies "screened out for EQIA". This allows stakeholders who disagree with this recommendation to submit their views. In the event of any stakeholder disagreeing with the decision to screen out any policy, the screening exercise will be reviewed.

Appendix 2 Rural Needs Impact Assessment (RNIA)

SECTION 1

Defining the activity subject to Section 1(1) of the Rural Needs Act (NI) 2016

1A. Name of Public Authority: Armagh City, Banbridge & Craigavon Borough The Council

1B. Please provide a short title which describes the activity being undertaken by the Public Authority that is subject to Section 1(1) of the Rural Needs Act (NI) 2016.

Draft Armagh City Banbridge and Craigavon Borough Council Cemetery Strategy

1C Please indicate which category the activity specified in Section 1B above relates to:

Developing a ☐ Policy ☒ Strategy ☐ Plan/Procedure ☐ Activity

Adopting a ☐ Policy ☐ Strategy ☐ Plan/Procedure ☐ Activity

Implementing a ☐ Policy ☐ Strategy ☐ Plan/Procedure ☐ Activity

Revising a ☐ Policy ☐ Strategy ☐ Plan/Procedure ☐ Activity

Designing a Public Service ☐

Delivering a Public Service ☐

1D. Please provide the official title (if any) of the Policy, Strategy, Plan or Public Service document or initiative relating to the category indicated in Section 1C above

Draft Armagh City, Banbridge and Craigavon Borough Council Cemetery Strategy

1E. Please provide details of the aims and/or objectives of the Policy, Strategy, Plan or Public Service

To ensure the short/medium- and long-term delivery of an effective cemetery service that meets the needs of all residents within the Borough.

1F. What definition of 'rural' is the Public Authority using in respect of the Policy, Strategy, Plan or Public Service?

- Population Settlements of less than 5,000 (Default definition) ☒X
- Other Definition (Provide details and the rationale below) ☐
- A definition of 'rural' is not applicable ☐

Details of alternative definition of 'rural' used

N/A

Rationale for using alternative definition of 'rural'

N/A

Reasons why a definition of 'rural' is not applicable.

N/A

SECTION 2

Understanding the impact of the Policy, Strategy, Plan or Public Service

2A. Is the Policy, Strategy, Plan or Public Service likely to impact on people in rural areas?

Yes ☐ No ☒X If response is No go to 2E

2B. Please explain how the Policy, Strategy, Plan or Public Service is likely to impact on people in rural areas.

Click or tap here to enter text.

2C. If the Policy, Strategy, Plan or Public Service is likely to impact on people in rural areas *differently* from people in urban areas, please explain how it is likely to impact on people in rural areas differently.

Click or tap here to enter text.

2D. Please indicate which of the following rural policy areas the Policy, Strategy, Plan or Public Service is likely to primarily impact on.

- | | |
|---|--------------------------|
| Rural Businesses | ☐ |
| Rural Tourism | ☐ |
| Rural Housing | ☐ |
| Jobs or Employment in Rural Areas | ☐ |
| Education or Training in Rural Areas | ☐ |
| Broadband or Mobile Communications in Rural Areas | ☐ |
| Transport Services or Infrastructure in Rural Areas | ☐ |
| Health or Social Care Services in Rural Areas | ☐ |
| Poverty in Rural Areas | ☐ |
| Deprivation in Rural Areas | ☐ |
| Rural Crime or Community Safety | ☐ |
| Rural Development | ☐ |
| Agri-Environment | ☐ |
| Other (Please state) | |

Click or tap here to enter text.

If the response to Section 2A was YES GO TO Section 3A.

2E. Please explain why the Policy, Strategy, Plan or Public Service is NOT likely to impact on people in rural areas.

This strategy aims to deliver a cemetery service to meet the needs of all residents regardless of their postcode and covers the delivery of cemetery functions in urban and rural locations. It will have no impact on people living in rural areas.

SECTION 3

Identifying the Social and Economic Needs of Persons in Rural Areas

3A. Has the Public Authority taken steps to identify the social and economic needs of people in rural areas that are relevant to the Policy, Strategy, Plan or Public Service?

Yes ☐ No ☐X If response is No go to 3E

3B. Please indicate which of the following methods or information sources were used by the Public Authority to identify the social and economic needs of people in rural areas.

- | | |
|--|--------------------------|
| Consultation with Rural Stakeholders | ☐ |
| Consultation with Other organisations | ☐ |
| Published Statistics | ☐ |
| Research Papers | ☐ |
| Surveys or Questionnaires | ☐ |
| Other Publications | ☐ |
| Other Methods or Information Sources
(include details in Question 3C below) | ☐ |

3C. Please provide details of the methods and information sources used to identify the social and economic needs of people in rural areas including relevant dates, names of organisations, titles of publications, website references, details of surveys or consultations undertaken etc.

Click or tap here to enter text.

3D. Please provide details of the social and economic needs of people in rural areas which have been identified by the Public Authority?

Click or tap here to enter text.

If the response to Section 3A was YES GO TO Section 4A.

3E. Please explain why no steps were taken by the Public Authority to identify the social and economic needs of people in rural areas?

Council continues to operate several cemeteries throughout the Borough, both in urban and rural locations. Under the strategy, there are no plans to remove or reduce cemetery

services for people in rural settings. There is therefore no specific impact on those living in rural areas.

SECTION 4

Considering the Social and Economic Needs of Persons in Rural Areas

4A. Please provide details of the issues considered in relation to the social and economic needs of people in rural areas.

Consideration has been given to how rural and urban communities might be impacted by this policy review. No impacts were identified for those living in rural areas.

SECTION 5

Influencing the Policy, Strategy, Plan or Public Service

5A. Has the development, adoption, implementation or revising of the Policy, Strategy or Plan, or the design or delivery of the Public Service, been influenced by the rural needs identified?

Yes ☐ No ☒ If response is No go to 5C

5B. Please explain how the development, adoption, implementation or revising of the Policy, Strategy or Plan, or the design or delivery of the Public Service, has been influenced by the rural needs identified.

Click or tap here to enter text.

If the response to Section 5A was YES go to 6A.

5C. Please explain why the development, adoption, implementation or revising of the Policy, Strategy or Plan, or the design or the delivery of the Public Service, has NOT been influenced by the rural needs identified.

Council's cemetery service is delivered in both urban and rural settings, with no specific impacts identified for those living in rural environments.

SECTION 6

Documenting and Recording

6A. Please tick below to confirm that the RNIA Template will be retained by the Public Authority and relevant information on the Section 1 activity compiled in accordance with paragraph 6.7 of the guidance.

I confirm that the RNIA Template will be retained, and relevant information compiled. ☒x

Rural Needs Impact Assessment undertaken by: ☒ (Martin Mc Corry)

Position: ☒ (Cemetery manager)

Department / Directorate: ☒ (Climate, sustainability & Parks)

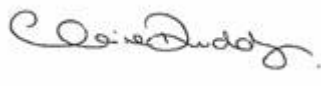
Signature: 

Date: 12/08/2025

Rural Needs Impact Assessment approved by: ☒ (Claire Duddy)

Position: ☒ (Head of Climate Sustainability and Parks)

Department / Directorate: ☒ (Environmental Services and Sustainability)

Signature: 

Date: 12/08/2025