READING BOROUGH COUNCIL

REPORT BY DEPUTY CHIEF EXECUTIVE

то:	POLICY COMMITTEE		
DATE:	14 JUNE 2021		
TITLE:	CEMETERY POLICY		
LEAD COUNCILLOR:	RUTH MCEWAN	PORTFOLIO:	CORPORATE AND CONSUMER SERVICES
SERVICE:	CORPORATE IMPROVEMENT AND CUSTOMER SERVICES	WARDS:	BOROUGHWIDE
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1. PURPOSE OF REPORT AND EXECUTIVE SUMMARY

- 1.1 To present the new draft Cemetery & Crematorium Regulations (Regulations) for public consultation.
- 1.2 Under the Local Authorities' Cemeteries Order 1977 (LACO) legislation, Local Authorities are required to prepare and adopt Regulations that set out the Council's policy and procedures for the operation of the cemetery. The last time the Regulations were updated and adopted by the Council was in 2011. The Regulations apply to Henley Road Cemetery, Reading Cemetery and Caversham Cemetery only. They also apply to Reading Crematorium and Gardens of Remembrance based at Henley Road Cemetery.
- 1.3 In October 2020, representations were made to the Council stating that the Bereavement Service the Council currently provides does not fully meet the needs of the Muslim community. In consultation with the Lead Councillor for Corporate and Consumer Services and the then Executive Director for Resources, temporary changes to the service were made, primarily the Council offered the opportunity for the families to retrospectively upgrade to a traditional grave (these changes related to the 5th Muslim section of the cemetery in the area known as 'Park' only. See appendix 3). The Council also committed to review the current Regulations and consult on the revised proposals.
- Appendix 1 Draft Cemetery & Crematorium Regulations 2021
 Appendix 2 Equality Impact Assessment
 Appendix 3 Cemetery Plan and Grave Types

2. RECOMMENDED ACTION

- 2.1 To approve the Draft Cemetery & Crematorium Regulations for public consultation as set out in Appendix 1
- 2.2 To note a further report will be brought to Policy Committee in September 2021 following the outcome of the consultation process; and
- 2.3 To approve the Councils holding position as set out in section 4.2.6 prior to agreement of the new Regulations.

3. POLICY CONTEXT

- 3.1 Local Authorities are required to publish Regulations that set out their service offer for burials within Council owned cemeteries. The Council operates 3 cemeteries and has adopted a further 5 closed churchyards. The Regulations only apply to 3 cemeteries as these are under our full control. They also apply to the Reading Crematorium and Gardens of Remembrance based in Henley Road Cemetery.
- 3.2 In September 2010 the Council adopted the Charter for the Bereaved which sets out a best practice model for cemeteries operations and an inclusive service provision for all faiths, where possible. In summary the Charter:
 - seeks to generate interest in and educate people about bereavement. It also helps to influence the expansion of services and clarify the various roles and responsibilities of those involved.
 - is a commitment to improving the service by confronting rather than disguising or ignoring death.
 - is intended to define the rights of every individual who experiences bereavement. In achieving this aim, it also sets standards of service related to burial, cremation, and funerals. It is a written statement of what can be expected and enables people to judge the quality of the service received.
 - seeks to increase the range of choice and options available to the bereaved.
 - seeks to enable the bereaved to arrange a meaningful funeral service with a content that meets with their own specific needs and requirements.

4. THE PROPOSAL

4.1 Current Position:

4.1.2 Background:

In 2016 the Council approved a change of use for recreational land located within the Henley Cemetery boundaries to be converted to burial land to extend the longevity of the cemetery. Although the original land had been purchased for the purpose of burial land in 1927, since this time the land had been used as recreational ground. Due to the lack of capacity at the Henley Road Cemetery, it was agreed in November 2015 this land become the new area for burials.

- 4.1.3 The land extension, now known as Westfield, was originally designated for Lawn Grave burials only, with a stipulation that all graves should be double depth. This allowed for a further provision of 9.5 years of Lawn burials, in addition to around 4.75 years in Mayfield (Traditional and Lawn Graves).
- 4.1.4 In July 2018, an initial consultation was held with Mosque Leaders on the proposals for burials within Westfield. Westfield is a multi-faith burial area of the cemetery however, Muslim burials were planned to happen on one side of the cemetery and all other burials at the opposite side, with grave plots eventually meeting in the middle.
- 4.1.5 There were some concerns raised by the Mosque leaders at the time of the consultation and a further meeting was held in 2019 with agreement that a community meeting should be arranged to consult on the proposals more broadly. The concerns raised were around the types of graves being offered in the new Muslim section of Westfield. However, the community meeting did not subsequently take place.
- 4.1.6 When the first burial took place in Westfield, the Service applied the general Lawn Grave burial rules to this area of the cemetery, with the addition that families needed to be offered a double depth burial plot. Families were also offered a Traditional Grave in the Mayfield area of the cemetery.
- 4.1.7 In October 2020 the Council received a complaint relating to the provision of service for Muslim faith burials at the cemetery. This related to the 5th Muslim section in the cemetery located in the Park area (see appendix 3). In response to the complaint the Service made some temporary changes to the service to better meet the needs of the community; primarily the Council offered the opportunity for the families to retrospectively upgrade to a Traditional Grave. These changes were made in consultation with the Lead Councillor for Corporate and Consumer Services and the then Executive Director for Resources. The service committed to review the current Regulations and consult on proposals. The primary areas of concern were:
 - The original consultation had not been fully concluded.
 - There was lack of clarity for Muslim families about the differences between a Lawn Grave and a Traditional Grave.
 - There were concerns that double depth and Lawn Graves were not in keeping with the requirements for Muslim Burials.
 - Concerns that Lawn Graves could be walked over or driven over by maintenance vehicles (grass cutters).
- 4.1.8 In March 2021, the Council held two community meetings with the Muslim community (one with Mosque leaders and one with the wider community). Around 70 residents and all mosque leaders in Reading attended the meetings. Although the Council has been providing Muslim Burials since the 1980's, it has become clear the Muslim community feel the Bereavement Service is not meeting the changing needs of Muslim residents.

4.1.9 **Operating Practices:**

There have been numerous additions and changes to operating practices across the cemetery over the past 40 years. Both in response to customer need/request, as well as changes to Regulations. This has resulted in many areas of the cemetery that were intended to be Lawn Graves, having been mounded or marked out with fences over time.

- 4.1.10 The enforcement of the Regulations has not been routinely applied for several years. Enforcing our policies is a sensitive issue for families that wish to adorn or mark out graves with items that contravene the Regulations. Prior to taking any action (e.g the removal of adornments) the Bereavement Service contact the grave owner to notify them of the contraventions. On occasion, and as a last resort, grounds maintenance teams will need to take action, for example where grave adornments encroach on neighbouring graves, are dangerous or where plants are overgrown etc.
- 4.1.11 These changes and lack of enforcement activity have had operational implications for the way the cemetery has been managed. Namely areas of the cemetery that could have been maintained with drive on grass mowers, now need to be maintained using hand mowers and strimmer's. This has increased maintenance costs, as maintaining a Traditional Grave takes around 3 times longer than a Lawn Grave. The current budget for grass mowing and grave digging across our cemetery's is £275,000 per annum.

4.1.12 Cemetery Longevity:

Changes to the Regulations will have longer term implications for the longevity of Henley Road Cemetery as a burial ground for the community. There is a national shortage of burial land and Henley Road Cemetery is the only landholding the Council currently has that is suitable for burials.

- 4.1.13 The predicted lifespan of Westfield was 9.5 years using an average of 125 new full body burials a year (figures 2016-2019). Although double-depth graves are dug, it is not an enforceable policy to insist a grave owner gives permission for another family member to be buried in the plot. Therefore, due to a reluctance by families to utilise the double depth graves, the lifespan of Westfield is again significantly reduced. Furthermore, the above figures do not reflect the true burial activity over the last 3 years or the increased burial activity in 2020 due to the Pandemic. In 2018 there were 203 burials, 2019 207 burials and in 2020, there were 287 burials. All three years showing a significantly higher number than the average predicted. It is accepted these burials were split between Mayfield and Westfield, however the increase particularly impacted on Westfield, due to the high number of Muslim Burials.
- 4.1.14 The newly revised projections (considering the proposals and the change in calculation) for the lifespan of Westfield is approximately 5 years and Mayfield is 3 years.
- 4.1.15 Second interments can still take place throughout the rest of the cemetery where there is only one coffin/cremated remains within the grave.
- 4.1.16 Currently RBC offer burials to customers outside of the Reading Borough Council Boundary. Over the past 3.5 years (Jan 2018 - Apr 2021) the number of burials for out of area residents is 112 (out of 799 total). Out of area burials incur additional charges. For example, a Lawn Grave would cost a Reading resident £1075 compared to £3225 for someone who lived out of the Borough. This excludes the interment fee which is the same regardless of residency. Further information is provided in the Section 10 - Financial Implications.

- 4.1.17 The person purchasing the exclusive rights to a grave space acquires only the right of burial in the grave for a period granted for 75 years. The ownership of the land and responsibilities remain the property of RBC. The owner is eligible to apply for a permit to place and maintain a memorial on the grave space if they wish.
- 4.1.18 There are circa 670 burial plots for cremated remains, with scope to increase this number considerably. It is estimated that there are 14 years' worth of capacity for this type of burial, currently planned for.
- 4.1.19 There are limited opportunities to expand Henley Road Cemetery any further for full body burials. In 2015 three land options were considered: BBC land to the rear of the cemetery, allotments land (originally purchased as burial ground) adjoining the cemetery and the recreation ground (now Westfield). At this time only the recreation ground was considered a viable option for expansion, although the report noted that the non-statutory allotment land should be retained for future consideration of burial ground.
- 4.1.20 Originally the options for the BBC land were based on a land swap and this is no longer viable, due to temporary housing being sited on the piece of land the Council had intended to swap. However, there are currently no active applications or pre-applications within the BBC land site. Therefore, there may be opportunities to enter in to negotiations.
- 4.1.21 Another option would be to explore out of area or cross border land with a neighbouring authority. A further report will be brought forward to Policy Committee in September 2021 with proposals on future provision of burial land. In the meantime, the options set out below may impact on the longevity of the cemetery as outlined in section 4.1.13. Where this is the case, it is highlighted with the potential impact.

4.2 Options Proposed

- 4.2.1 The proposed operations and service provision are set out within Appendix 1 "Draft Cemetery & Crematorium Regulations". The proposed changes are within the context of a national burial land shortage, and a predicted burial provision in Reading for a further 8 years (Westfield 5 years, Mayfield 3 years) should these proposed changes be adopted. This is a reduction of 3 years in the overall longevity of the burial space compared to when the recommendations to extend the land into Westfield were adopted in 2015 and taking into account 6 years have already passed.
- 4.2.2 The proposals have been developed to ensure the changing needs of communities within Reading, are met where reasonable and practicable to do so, specifically considering faith burial needs, and ensuring our operations are cost effective and efficient.
- 4.2.3 Several non-material changes have been made to the Regulations document, these include layout, showing both metric and imperial measurements and updates to legislation. The proposed new, changed or discarded policies to current operational practices are as follows:

Service		Description of Change/New rules
Double Depth Graves Graves dug to a depth of 6ft 6'(1.98m) to accommodate 2 standard depth coffins no more than 18' (457mm) each.	Change	 While the longevity of the extension land (Westfield) was based on 9.5 years (now predicted to be 5 years), this had been based on graves being Lawn and double depth. Although double-depth graves are dug, it is not an enforceable policy to insist a grave owner gives permission for another family member to be buried in the plot. Double depth graves will still be dug and offered, but the Council cannot mandate this in our cemetery regulations. Continuing to dig double depth graves provides the option for families to have a second burial in the plot at a later date, without having to undertake the legal exhumation process when disturbing a grave.
Adjacent Plot Graves Occasionally a family will purchase two plots side by side. Typically, these graves are Traditional. In the period Jan 2018 to date, 62 such graves have been purchased. Some of these adjacent graves did have one, double sized kerb set, and one memorial stone placed centrally over both graves known as Double Grave Sets. These were only allowed as a concession for a limited time.	Change	In late 2015/early 2016, the Council stopped the pre-purchase of Muslim Graves as ground in these dedicated areas was scarce. Burials were to happen sequentially from that point forward, so demand for burial space could be managed on a first come first service basis. It is still possible to purchase 2 plots adjacent to each other (at the time of first death) in Mayfield. To preserve burial space, this will no longer be an option in either Mayfield or Westfield for any residents. A family will still be able to bury loved ones together in a double depth grave or, upon request treble-depth. Treble depth graves are usually requested when a child has died, and the parents want to be buried with them in the future. This will help to extend the number of burials being offered to residents. Double size Traditional Grave kerb sets are currently not permitted in either Mayfield or Westfield. The new Regulations have been updated to confirm this.
Out of hours services Currently we provide weekend burials for	Change	Standard Opening hours will now be extended to include Saturdays as shown below:

Service		Description of Change/New rules
Muslim Faith Burials only.		Office - 10am - 4pm
Provision for this is made		Burial Services in Chapel:
on the basis of an out of		First Service 10.45 - Last Service 1pm
hours service. Two		Burial Services at Graveside:
members of staff need to		First 11.15am - Last 2.15pm
be working for a burial to		'
take place. Therefore,		In addition, a late night on a Thursday in the
the Council provide		Summer Season (May-Aug inclusive) will also
'licensee' options,		be provided.
whereby a member of the		Office - 9am - 7pm
public is licensed to		Burial Services in Chapel:
operate as a member of		First Service 9.45 - Last Service 3.45pm
the burial staff.		Burial Services at Graveside:
		First 9.45am - Last 4.30pm
		This addresses resilience for the service on
		Saturdays and provides a regular service
		provision for anyone that wishes to bury on a
		Saturday. This also removes the
		requirements for Licensees.
Grave Types	Change	A new type of grave will be offered in areas
Currently the Council		of the cemetery that are currently set aside
offer two types of graves		for Muslim graves. This policy should be
for burial of a coffin:		retrospectively applied to Westfield and
Traditional and Lawn		families offered the opportunity to convert a
Grave depending on the		lawn grave to a mounded grave (subject to
area of the cemetery.		fees).
Like graves are clustered		
together to ensure		Mounded graves: These graves will be
maintenance costs are		mounded to a maximum height of 300mm.
kept low. (See layouts in		5
appendix 3)		A Mounded grave can have either a Memorial
		stone (a headstone or a footstone depending
		on the location with cemetery) or a name
		plaque (size to be determined). This grave
		type will be charged at the same price as a
		Traditional grave to reflect the overall
		increase in maintenance costs. The cost of
		the memorial or plaque remains the
		responsibility of the family.
Cemetery Areas	Change	Westfield:
Each area of the cemetery		Is multi-faith with the Muslim section starting
allows for certain types of		at one end (multi or non-faith burials will
graves to be purchased.		start at the opposite end)
This section lists only		All sections of Westfield to be allocated as
those where changes are		Lawn or Mounded graves only. They will be
proposed to the		grouped with like graves where possible.
layout/operation.		
NB: Mayfield Is multi-faith		The introduction of Mounded graves will
throughout (with no		ensure the space is maximised while still
dedicated faith areas) and		addressing the concerns of the Muslim

Service		Description of Change/New rules
is split into 4 separate sections. 3 sections are allocated for Lawn Graves only and 1 section is Traditional Graves only. Park: This is a multi-faith area with 5 areas dedicated to Muslim burials. The Park section has no capacity for new burials except for 2 nd interments into existing grave plots. Grave Orientation Traditionally the	Change	Description of Change/New rules community about the walking over of lawn graves. Furthermore, the aesthetic of the burial ground is maintained, and the maintenance will be kept simple. Mayfield: East Westfield: East - All graves will be placed in
cemetery has oriented graves facing east. However, depending on the area of the cemetery orientation will differ slightly. (See layouts in appendix 3)		rows, with a plinth for a headstone only (if selected.) This will avoid any confusion around headstones or footstones Park: East
Access Some older areas of the cemetery do not allow for wheelchair access. It is not feasible to make these accessible to wheelchairs due to the size and positioning of burial plots.	New	All new burial areas will allow a 900mm grassed walkway between rows to allow access for a wheelchair.
Quran Graves This is a standard size grave which has wooden shoring. The dig fee is shared between Reading Mosques. The grave is then securely covered, and families request a key as an when required to place sacred scripts in the grave. Generally, this is dug to 7ft long x 2ft 6' wide (2133mm x 762mm) and to double depth although the most recent was dug to treble depth.	Change	Quran Graves will still be provided. However due to recent concerns around the types of items placed in the grave (non-scriptures) that may have environmental impacts and for safety issues, access to the grave will be by appointment only. A member of the cemetery team will discreetly escort the family to the grave to open and lock the grave. Quran graves are not located in the same place as other graves. The location of these graves is at the discretion of the Cemetery.

- 4.2.4 It is important to note the only areas of Henley Road Cemetery that can accept first burials is Mayfield and Westfield. All other areas of the cemetery can accept second interments where an appropriate grave depth has been purchased or the second interment is for cremated remains.
- 4.2.5 The new Regulations will be consulted upon prior to their adoption. In the meantime, a holding position is recommended for all new interments in Westfield.
- 4.2.6 Holding position: Families will be offered a Lawn Grave only in the Westfield area of the cemetery. When the new Regulations have been consulted upon and adopted, the new rules applying to this area can be retrospectively applied. Other areas such as Park section could also have the rules retrospectively applied, however this would increase maintenance costs as outlined. Where customers wish to change their grave type, they can do so by paying the appropriate fee for a new permit.

Service		Reason
No Change to current	Discarded	The current cemetery regulations no longer
cemetery regulations		reflect the needs of our community.
Stop Burials for out of	Discarded	Due to restricted land capacity all residents
Area Residents.		that live outside the Reading Borough
Residents that do not live		Council Boundary are charged an additional
in Reading Borough are		fee.
charged an additional fee		
to use Henley Cemetery.		In the past 3.5 years 799 burials have taken
		place at Henley Road Cemetery (of which
		112 were out of area)
		Based on income data over the last 3 years,
		the projected loss of income over the next
		3-year period could be approximately
		£240,000 per annum.
		Not allowing out of area residents to use Henley Road Cemetery will only extend the longevity of Henley Road Cemetery by a further 12 months.
		Therefore, on balance the lass of income to
		Therefore, on balance the loss of income to support the maintenance of the cemetery
		would have too great an impact.
Out of hours services	Discarded	Due to Muslim burials needing to be
Continue to operate as an	Disculated	arranged as soon as possible after the
emergency out of hours		death, Saturday burials will always need to
service.		be offered. This change provides resilience
		for the service, reduces the need for
		licensees, and allows bookings to be made
		on a Saturday for Monday burials.
		Changes will need to be made to working
		hours, as currently staff are only working

4.3 Other Options Considered

		voluntarily on a Saturday to meet the needs of families. This will be subject to a formal employee consultation. Offering a burial service on a Sunday is not proposed as this will increase the overall number of staff required by the service and is unlikely to be cost effective.
Grave Types Currently the Council offer two types of burial grave: Traditional and Lawn Grave depending on the area of the cemetery. Like graves are clustered together to ensure maintenance cost are kept low. (See layouts in appendix 3)	Discarded	Continuing to only provide Lawn and Traditional graves would not meet the needs of the Muslim Faith or address concerns raised through initial consultation.

5. CONTRIBUTION TO STRATEGIC AIMS

- 5.1 The purpose of this section is to ensure that proposals contained in reports are in line with the overall direction of the Council by meeting at least one of the Corporate Plan priorities:
 - Healthy Environment
 - Thriving Communities
 - Inclusive Economy
- 5.2 The proposals within this report support the Council's priority of Thriving Communities:
 - Committed to tackling inequality in our society, to ensure everyone has an equal chance to thrive whatever their economic, social, cultural, ethnic, or religious background.
 - Prioritising the needs of the most marginalised groups and the most vulnerable adults and children in our communities.
 - To promote equality and social inclusion for all.
- 5.3 Throughout the pandemic and more than ever before our citizens have felt the impact of losing loved ones. The Council has been able to respond to the needs of our community through this period and prior, however the current Regulations do not fully reflect our commitment to promoting an equal and inclusive community. The draft Regulations set out an inclusive service offer for bereaved families in Reading; balancing faith, non-faith, and accessibility needs, with the ongoing management of a cemetery for at least 75 years.

6. ENVIRONMENTAL AND CLIMATE IMPLICATIONS

6.1 The Council declared a Climate Emergency at its meeting on 26 February 2019 (Minute 48 refers). There are no climate change or environmental impacts to this report.

7. COMMUNITY ENGAGEMENT AND INFORMATION

- 7.1 In March 2021 a Reading Mosque leaders meeting was convened to begin setting out the Councils position in relation to Muslim Burials. Following this a Muslim community meeting was held with around 70 Reading residents in attendance. The purpose of the meetings was to provide the Muslim community with an opportunity to comment on current Regulations and the impacts they had in relation to Muslim faith burials. The Council committed to undertake a full review of the Regulations to address the concerns of the community.
- 7.2 The primary concerns set out by the community were:
 - The limited types of graves available
 - Cost of memorial stones and kerb sets
 - Pre-build of vaulted graves
 - Burials on Saturdays, in relation to ensuring their loved one could be buried as soon as possible after their death, and no later than 3 days.
- 7.3 The draft Regulations are specifically informed by the issues raised at the meetings and an updated equality impact assessment has been completed.
- 7.4 The draft Regulations will need further consultation to ensure that the proposals address and balance the needs of the wider community as well. Therefore, a consultation will be run (via our consultation portal) for 45 days where residents will be able to comment on the Regulations.
- 7.5 To encourage participation from all our communities and customers, signs will be placed around the grounds about the consultation. It will also be promoted on social media, and through our Voluntary and Community sector networks as well. These include:
 - The Mosque Burials Working Group (set up specifically to represent members of the Muslim community on these matters)
 - Access and Disabilities Working Group
 - ACRE: Alliance for Cohesion and Racial Equality
 - Religious and Faith groups
 - Cultural Identity groups
 - Bereavement Support services
 - Comprehensive list of other voluntary and community sector organisations

8. EQUALITY IMPACT ASSESSMENT

- 8.1 Under the Equality Act 2010, Section 149, a public authority must, in the exercise of its functions, have due regard to the need to-
 - eliminate discrimination, harassment, victimisation and any other conduct that is prohibited by or under this Act;
 - advance equality of opportunity between persons who share a relevant protected characteristic and persons who do not share it;
 - foster good relations between persons who share a relevant protected characteristic and persons who do not share it.

- 8.2 An equality impact assessment (EIA) has been undertaken and the Draft Cemetery & Crematorium Regulations set out in Appendix 1 reflect the findings of the assessment. The EIA specifically considers:
 - Faith Burials (Muslim, Christian, Hindu, and Sikh)
 - Traveller and Gypsy Burials
 - BAME
 - Access to the cemetery
- 8.3 The EIA has identified that current service provision and operational practices at the cemetery do not fully meet the needs of our Muslim or Disabled communities. In summary this includes:
 - Operating hours during weekends
 - Grave types (Traditional, Lawn and Mounded graves, double depth, adjacent plots)
 - Speed of burial service
 - Accessibility on site (specifically for wheelchair users)

9. LEGAL IMPLICATIONS

9.1 Under the Local Authorities' Cemeteries Order 1977 (LACO) Legislation the Council must set out its Regulations and publish them.

10. FINANCIAL IMPLICATIONS

- 10.1 Implementation of some of the following proposals will have an impact on costs and income generation:
 - Traditional Grave areas and Mounded grave areas of the cemetery will result in an increased cost of maintenance. Typically, a Mounded or Traditional grave costs around 3 times more to maintain than a Lawn grave area. This is because grass cutting for Lawn graves areas can be done with drive on grass cutters, whereas traditional or mounded graves require a hand pushed mower and strimmer. In addition to the mowing, mounded graves will require a 'shell' or covering to ensure the mound remains in place. It is anticipated a sedum mat would be used for this purpose. These mats cost approximately £35 each. Manual weeding & tending of the mats will be required.
 - Currently the cost of burials is held artificially low. The cost does not currently reflect the cost for maintenance of a grave over the 75-year lease period. Depending on the type of full body burial it can cost between £1075 to £3225. This cost covers: the grave digging fee, the dressing of the grave (e.g, grass matting, shoring, shovels for families to fill if they wish), admin costs such as staff salaries, concrete plinths on which the memorial stone is placed, memorial testing every 5 years (this would occur 15 times for a 75-year lease), and general maintenance of the grounds over the 75 years.
 - To offset these additional costs the Council will explore additional service offers such as additional graveside maintenance services, memorialisation, and extension of gardens of remembrance.
- 10.2 The impacts proposed in this report therefore will increase the maintenance costs over the life of the cemetery. Although this cannot yet be fully costed. A

review of the current ground's maintenance costs will be undertaken to identify opportunities to control costs. If appropriate a revenue growth bid may have to be submitted if we cannot offset costs against income.

- 10.3 Furthermore, when we are no longer able to offer new full body burials, income will also decrease (although we can still undertake second interments and burials for cremated remains.)
- 10.4 The table below shows the rationale for continuing to provide an out of area burials service.

	Actual Income Received Out of Borough Burials	What the income would have been if these had been in Borough burials only
Income received 2018/2019	£113,014.00	£38,010.00
Income received 2019/2020	£68,470.00	£23,160.00
Income received 2020/2021	£169,292.00	£60,430.00
Income received April 2021 to 05.05.2021	£15,645.00	£5,150.00
TOTAL	£366,421	£126,750

11. BACKGROUND PAPERS

11.1

- ICCM Charter for the Bereaved
- Guide for Burial Ground Managers (Department for Constitutional Affairs)
- GardensofPeace.org Website
- Cemeteries and Burial Culture and Traditions for people from the Traveller communities