

# Equality & Poverty Impact Assessment 00966 (Version 1)

## SECTION ONE: ESSENTIAL INFORMATION

<b>Service &amp; Division:</b>	Place Services Environment & Operations	<b>Lead Officer Name:</b>	James Baillie
		<b>Team:</b>	Estates
		<b>Tel:</b>	07801649241
		<b>Email:</b>	james.baillie@falkirk.gov.uk
<b>Proposal:</b>	Bereavement Services - Fee Uplifts 25/26	<b>Reference No:</b>	PS254

What is the Proposal?	Budget & Other Financial Decision	Policy (New or Change)	HR Policy & Practice	Change to Service Delivery / Service Design
	Yes	No	No	No

Who does the Proposal affect?	Service Users	Members of the Public	Employees	Job Applicants
	Yes	No	No	No

**Other, please specify:**

### Identify the main aims and projected outcome of this proposal (please add date of each update):

31/01/2025	The proposal is to increase fees and charges related to burials, cremations and other relevant bereavement services by 10% in 2025/26. This is to support the Council in bridging it's budget gap and to better align fees for bereavement services in the Falkirk area with those in neighbouring authorities whilst remaining cheaper than private crematorium operators

## SECTION TWO: FINANCIAL INFORMATION

For budget changes ONLY please include information below:			Benchmark, e.g. Scottish Average
Current spend on this service (£'0000s)	Total:		
Reduction to this service budget (£'0000s)	Per Annum:		
Increase to this service budget (£'000s)	Per Annum:		
If this is a change to a charge or concession please complete.	Current Annual Income Total:	£2.6m	FC is currently the 10th most expensive nationally for Interments, and 7th most expensive for Cremations.
	Expected Annual Income Total:	£2.86m	Assuming other providers do not increase their fees at all in 2025/26 (unlikely), FC will become the 5th most expensive for Interments, and 4th for Cremations.
If this is a budget decision, when will the saving be achieved?	Start Date:	01/04/2025	
	End Date (if any):		

**SECTION THREE: EVIDENCE** Please include any evidence or relevant information that has influenced the decisions contained in this EPIA. (This could include demographic profiles; audits; research; health needs assessments; national guidance or legislative requirements and how this relates to the protected characteristic groups.)

**A - Quantitative Evidence** This is evidence which is numerical and should include the number people who use the service and the number of people from the protected characteristic groups who might be affected by changes to the service.

Fees and charges within Bereavement Services have been subject to a detailed benchmarking exercise during 2024/25, as part of a wider review of the Council’s fees and charges that sought to support the Council in bridging its budget gap and better aligning fees with those in neighbouring authorities.

Based on 2024/25 pricing, Falkirk Council is currently the 10th most expensive nationally for Interments, and 7th most expensive for Cremations. In the case of Crematoria, privately operated establishments were also included in the benchmarking to provide a more complete picture of the Council’s position relative to all the offerings available to the public. This was essential for comparison against areas where there is no local authority operated crematorium facility.

Assuming other providers do not increase their fees at all in 2025/26 (unlikely), Falkirk will become the 5th most expensive for Interments, and 4th for Cremations. Modelling that considered higher uplifts of 15% and 20% was also undertaken, which showed that Bereavement Services fees could be uplifted by as much as 20% (Interments) and 15% (Cremations) without having any further impact on Falkirk Council’s position relative to other providers, beyond the change arising from only a 10% uplift. It was the view of officers that 10% was sufficient to provide a meaningful contribution to the Council’s budget gap whilst minimising the impact on service users.

No data exists on the number or percentage of service users who may be within protected characteristic groups, as almost all funeral services provided are arranged through funeral directors. The Council carries out approximately 1800 cremations and 800 burials per year.

The Scottish Index of Multiple Deprivation (SIMD) 2020 provides insights into levels of deprivation across Scotland, including the Falkirk Council area. The SIMD measures multiple aspects of deprivation, including income, employment, health, education, access to services, crime, and housing. In 2020, approximately 15% of Falkirk residents lived in the 20% most deprived areas in Scotland.

**B - Qualitative Evidence** This is data which describes the effect or impact of a change on a group of people, e.g. some information provided as part of performance reporting.

**Social - case studies; personal / group feedback / other**

The proposed uplifts have not been subject to direct public consultation as the Burial and Cremation (Scotland) Act 2016 sections 20 and 63 state that the burial or cremation authority "may charge such.. burials...and cremation fees as they think fit".

**Best Judgement:**

<b>Has best judgement been used in place of data/research/evidence?</b>	Yes
<b>Who provided the best judgement and what was this based on?</b>	Place Services Officers and Service Accountants financial modelling and projections against benchmarking, costs and income targets.
<b>What gaps in data / information were identified?</b>	Protected characteristic data on those who engage with the service.
<b>Is further research necessary?</b>	No
<b>If NO, please state why.</b>	The fee uplfits are necessary to support the Council in bridging it's budget gap and better aligning fees with those of neighbouring providers.

**SECTION FOUR: ENGAGEMENT**

Engagement with individuals or organisations affected by the policy or proposal must take place

<b>Has the proposal / policy / project been subject to engagement or consultation with service users taking into account their protected characteristics and socio-economic status?</b>	No	
<b>If YES, please state who was engagement with.</b>		
<b>If NO engagement has been conducted, please state why.</b>	The Burial and Cremation (Scotland) Act 2016 sections 20 and 63 state that the burial or cremation authority "may charge such.. burials...and cremation fees as they think fit". It is recognised that any increase in fee could potentially impact on vulnerable or low income families however appropriate mitigations and concessions are available.	
<b>How was the engagement carried out?</b>	<b>What were the results from the engagement? Please list...</b>	
<b>Focus Group</b>	No	
<b>Survey</b>	No	
<b>Display / Exhibitions</b>	No	
<b>User Panels</b>	No	
<b>Public Event</b>	No	
<b>Other: please specify</b>		
<b>Has the proposal / policy/ project been reviewed / changed as a result of the engagement?</b>	No	
<b>Have the results of the engagement been fed back to the consultees?</b>	No	
<b>Is further engagement recommended?</b>	No	

## SECTION FIVE: ASSESSING THE IMPACT

**Equality Protected Characteristics:** What will the impact of implementing this proposal be on people who share characteristics protected by the Equality Act 2010 or are likely to be affected by the proposal / policy / project? This section allows you to consider other impacts, e.g. poverty, health inequalities, community justice, carers etc.

Protected Characteristic	Neutral Impact	Positive Impact	Negative Impact	Please provide evidence of the impact on this protected characteristic.
Age	✓			No negative impacts identified.
Disability	✓			No negative impacts identified.
Sex	✓			No negative impacts identified.
Ethnicity	✓			No negative impacts identified.
Religion / Belief / non-Belief	✓			No negative impacts identified.
Sexual Orientation	✓			No negative impacts identified.
Transgender	✓			No negative impacts identified.
Pregnancy / Maternity	✓			No negative impacts identified.
Marriage / Civil Partnership	✓			No negative impacts identified.
Poverty			✓	Price increases for universal services will likely impact low income households the most. Based on SIMD 2020 data, approximately 15% of Falkirk residents lived in the 20% most deprived areas in Scotland.
Care Experienced	✓			No negative impacts identified.
Other, health, community justice, carers etc.	✓			No negative impacts identified.
Risk (Identify other risks associated with this change)				

**Public Sector Equality Duty: Scottish Public Authorities must have 'due regard' to the need to eliminate unlawful discrimination, advance quality of opportunity and foster good relations. Scottish specific duties include:**

	<b>Evidence of Due Regard</b>
<b>Eliminate Unlawful Discrimination (harassment, victimisation and other prohibited conduct):</b>	The proposed fee uplifts will not discriminate against any particular protected characteristic group. Mitigations are in place for low income households.
<b>Advance Equality of Opportunity:</b>	Services will continue to be available universally with appropriate concession options available. Any communications regarding price rises and/or service changes will continue to be provided in a range of accessible formats and inclusive language.
<b>Foster Good Relations (promoting understanding and reducing prejudice):</b>	The proposal offers limited scope to improve relations between different protected characteristic groups.

**SECTION SIX: PARTNERS / OTHER STAKEHOLDERS**

<b>Which sectors are likely to have an interest in or be affected by the proposal / policy / project?</b>		<b>Describe the interest / affect.</b>
<b>Business</b>	Yes	Funeral directors will be primary group impacted by the proposed uplifts, with their increased costs being passed on to the consumer.
<b>Councils</b>	Yes	Service users may opt to use facilities operated by other authorities.
<b>Education Sector</b>	No	
<b>Fire</b>	No	
<b>NHS</b>	No	
<b>Integration Joint Board</b>	No	
<b>Police</b>	No	
<b>Third Sector</b>	Yes	Third section organisations who support people from low income households.
<b>Other(s): please list and describe the nature of the relationship / impact.</b>		

## SECTION SEVEN: ACTION PLANNING

**Mitigating Actions:** If you have identified impacts on protected characteristic groups in Section 5 please summarise these in the table below detailing the actions you are taking to mitigate or support this impact. If you are not taking any action to support or mitigate the impact you should complete the No Mitigating Actions section below instead.

Identified Impact	To Who	Action(s)	Lead Officer	Evaluation and Review Date	Strategic Reference to Corporate Plan / Service Plan / Quality Outcomes
Poverty	Those from low income households	The Funeral Expense Assistance (Scotland) Regulations 2019 provides assistance for those who may struggle with the cost of a funeral through the Funeral Expense Assistance (FEA) programme. Other low-cost funeral options are available (e.g. direct cremations).	James Baillie	31/12/2025	Supporting Stronger and Healthier Communities  Financial Sustainability
Poverty	Those from low income households	Existing low cost funeral options and FEA criteria will be promoted.	James Baillie	31/12/2025	Supporting Stronger and Healthier Communities  Financial Sustainability

### No Mitigating Actions

**Please explain why you do not need to take any action to mitigate or support the impact of your proposals.**

<b>Are actions being reported to Members?</b>	Yes
<b>If yes when and how ?</b>	Full Council, March 2025 (Budget Meeting)

**SECTION EIGHT: ASSESSMENT OUTCOME**

Only one of following statements best matches your assessment of this proposal / policy / project. Please select one and provide your reasons.

No major change required	No	
The proposal has to be adjusted to reduce impact on protected characteristic groups	No	
Continue with the proposal but it is not possible to remove all the risk to protected characteristic groups	Yes	It is recognised that any increase in fee could potentially impact on vulnerable or low income families. In response to this, by way of mitigation to this proposal, the Funeral Expense Assistance (Scotland) Regulations 2019 provides assistance for those who may struggle with the cost of a funeral through the Funeral Expense Assistance (FEA) programme. Other low-cost funeral options are available (direct cremations).
Stop the proposal as it is potentially in breach of equality legislation	No	

**SECTION NINE: LEAD OFFICER SIGN OFF**

Lead Officer:

Signature:	<i>James Baillie</i>	Date:	31/01/2025
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**SECTION TEN: EPIA TASK GROUP ONLY**

<b>OVERALL ASSESSMENT OF EPIA:</b> Has the EPIA demonstrated the use of data, appropriate engagement, identified mitigating actions as well as ownership and appropriate review of actions to confidently demonstrate compliance with the general and public sector equality duties?	No
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<b>ASSESSMENT FINDINGS</b>  If YES, use this box to highlight evidence in support of the assessment of the EPIA  If NO, use this box to highlight actions needed to improve the EPIA	The EPIA does not demonstrate use of data and appropriate engagement as no consultation has been carried out and there is a lack of available data on protected characteristics of service users to inform the assessment. Instead, best judgement has been used.  Mitigating actions have been identified and proposed where assessment identifies potential for negative impact.
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<b>Where adverse impact on diverse communities has been identified and it is intended to continue with the proposal / policy / project, has justification for continuing <u>without making changes been made</u>?</b>	Yes	If YES, please describe: Mitigations have been proposed where the assessment identifies potential for adverse impact (for those experiencing poverty).
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**LEVEL OF IMPACT: The EPIA Task Group has agreed the following level of impact on the protected characteristic groups highlighted within the EPIA**

LEVEL		COMMENTS
HIGH	Yes / No	
MEDIUM	Yes / No	
LOW	Yes	Impact identified on those experiencing poverty, but mitigations in place to ensure support available with funeral costs is widely promoted.

**SECTION ELEVEN: CHIEF OFFICER SIGN OFF**

<b>Director / Head of Service:</b>			
<b>Signature:</b>	<i>Malcolm Bennie</i>	<b>Date:</b>	06/02/2025