

# Delegated Decision Report

Decision below £250k



<b>Subject:</b>	Registrars out of hours arrangements
<b>Decision maker: Senior Officer</b>	Shelley Kipling, Acting Chief Executive
<b>Decision maker: Cabinet Member</b>	Cllr Chris Goodwin, Cabinet Member for Don't Trash Oldham
<b>Decision date:</b>	21 <sup>st</sup> February 2025
<b>Report authors:</b>	Fran Lautman, Assistant Director of Customer Experience Marina Brown, Registration Services Manager
<b>Ward (s):</b>	All

## Reason for decision

The Registrars service became part of the Customer Services function in October 2024. This follows from the Medical Certificate of Cause of Death Regulations 2024 that came into force on 9 September 2024. Following these changes, a service review has taken place to ensure that we are delivering a resident focused out of hours service for death registrations that reflect the new regulations, meets the needs of our communities and are also clear and transparent.

## Recommendation(s)

1. To note the current practice to register deaths out of hours and the associated issues with the informal arrangements.
2. To note the changes to the death registration process as prescribed by the Medical Certificate of Cause of Death Regulations 2024.
3. To note a full year of demand data for death registrations during weekends.
4. To note the findings from the benchmarking undertaken of out of hours arrangements across Greater Manchester.
5. To review the options presented to move to a resident focused solution and the financial and people implications of doing so.
6. To approve the recommended option – Option 2 to deliver a death certificate on Saturdays between the hours of 9.30am – 12.30pm following the working hours of the duty Medical Examiner and 'green forms' on a Sunday and Bank Holiday to enable burials to take place and death certificates to be issued in person following this.

**1. Background**

- 1.1 Oldham Council's Registration Services are available in person Monday to Friday, 9am – 5pm at Chadderton Town Hall. At present there are no formal arrangements in place to support the death registration process on Saturdays, Sundays and Bank Holidays. The Registrar Manager is informally available remotely on Saturday and Sundays between the hours of 9am and 12pm. She is not currently remunerated to provide this support. There are two community contacts who can contact her directly between these hours. This informal arrangement provides no contingency, resiliency or respite for the service manager and cannot continue. Furthermore, the current practice is not publicly or transparently communicated causing issues. This understandably can cause frustration from residents and a lack of clarity as to when the service is available. Moving to a formal arrangement will provide a more appropriate staffing approach. It will also enable the Council to clearly communicate a more resident focused approach acknowledging that formal weekend arrangements are required to support the needs of our communities at this sensitive time.
- 1.2 Following the move of the Registrars Service to Customer Services in October 2024, a service review of out of hours death registration has taken place. This has entailed:
- reviewing the legislative changes effective from 9 September 2024 and any associated implications,
  - reviewing the demand data for death registration during weekends,
  - a benchmarking exercise across Greater Manchester to understand best practice and
  - engagement with the Registrars team.

**2. Legislation - death registration and certification process**

- 2.1 The Births and Death Registration Act, 1953 requires deaths to be registered in person within 5 days. The exception to this is if the Coroner is investigating the death. In accordance with the legislation, a death certificate is not required to undertake a burial. Once the Registrar has all the documentation required from the Medical Examiner, they can issue the 'green form' for a burial to take place. The formal death registration and issuing of a death certificate can take place within 5 days of the death and following the funeral where there is a requirement for the funeral to take place within a set time.
- 2.2 The Department for Health and Social Care (DHSC) introduced the Medical Certificate of Cause of Death Regulations 2024 that came into force on 9 September 2024. This changes the way in which the causes of death are scrutinized and certified in England and Wales with the introduction of a statutory Medical Examiner system. The changes means that independent scrutiny by a Medical Examiner is a statutory requirement prior to the

registration of all non-coronial deaths in England and Wales. The regulation introduces the new medical certificate cause of death to be used by attending practitioners and medical examiners. This change means that duty Medical Examiners are available 9.30am – 11.30am in Oldham on Saturday and Sundays and Bank Holidays (excluding Christmas Day and New Year’s Day), to prioritize the issuing of a medical certificate. The General Registrars Office (GRO) stipulate that the medical certificate is required for the Registrars service to issue the ‘green form’ to enable a burial to take place. Therefore, we need to provide a formal staffing arrangement to deliver this service.

### 3. Demand Data and Performance

3.1 Service data clearly demonstrates that there is a regular demand for service during weekends. From 1 April 2023 to 31 March 2024, 23 ‘green forms’ to enable a local burial to take place were issued by the Registration Manager during the weekend.

3.2 In this same period there were 3 instances whereby a ‘green form’ was issued and there was a change of arrangements whereby there was a request to remove the body out of England. In these cases, the Coroner must be satisfied that she does not need to investigate before she can issue her authority to remove the body out of England. She therefore requests sight of a death certificate before issuing her authority to enable this to happen requiring a death registration to be carried out with a family member in attendance. Currently the Coroner provides weekend cover 9am – 12pm on Saturdays, Sundays and Bank Holidays except Christmas Day and New Years Day. At present, the appointments are accommodated if a Registrar is available on a Saturday because they are present at Chadderton Town Hall to conduct a Wedding Ceremony. However, this must be fitted around ceremonies as it not always available. Requests falling on a Sunday are handled as a priority on a Monday morning.

3.3 Oldham’s Registration service is a top performer in the North-West. The GRO sets and publishes Key Performance Targets (KPTs). Cumulative performance from 1 April 2024 is as follows:

Process	KPT Target	North West Average	Oldham performance
<b>Death registration</b>	95% of deaths registered within 5 days	96%	98% (2% higher)
<b>Appointment availability</b>	95% of requests accommodated in 2 days	91%	100% (9% higher)
<b>Birth registration</b>	98% of births registered within 42 days	97%	98% (1% higher)
<b>Appointment availability</b>	95% of requests accommodated in 5 days	91%	100% (9% higher)

<b>Stillbirth registrations</b>	98% of births registered within 42 days	97%	100% (3% higher)
<b>Appointment availability</b>	95% of requests accommodated in 2 days	91%	100% (9% higher)

3.4 Any change to working hours would need to ensure continuation of excellent KPT performance.

#### **4. Benchmarking - good practice across Greater Manchester**

4.1 Benchmarking has been undertaken across Greater Manchester to understand how our regional neighbours undertake out of death registrations. Full details are outlined in *Appendix A*.

4.2 All councils deliver death registrations Monday to Friday. Out of hours arrangements vary significantly. All councils can issue 'green forms' out of hours. Bury and Wigan operate an on-call system from Friday afternoon closure through to Monday morning. The majority of Greater Manchester councils have on call arrangements on a duty basis. Bury and Oldham only have the Registration Manager fulfilling this. Rochdale, Salford and Stockport are available for 2 hours on each weekend day, Oldham and Trafford, are available for 3 hours, Manchester 3 hours on Saturdays and 2.5 hours Sundays. Tameside are available for 5 hours each day at the weekend with some provision for a death registration but have access issues to the Town Hall to register. Bolton's arrangements are unknown. Opening hours are predominately based around the availability of duty Medical Examiners which varies locally. Based on the conversations had and data available, we understand that only Tameside offer the full death registration process out of hours with all councils issuing 'green forms'.

4.3 As part of the benchmarking, consideration has also been given to opening hours. Oldham, Salford and Stockport are all open 8 hours a day, Monday to Friday. Bury open for 7.5 hours. Rochdale and Manchester City Council open for 7.25 hours and with Bolton, Tameside, Trafford and Wigan open for 7. The earliest opening is 8.15am and the earliest closure time is 3.30pm. Oldham's appointments are well utilized across opening hours. Closing earlier in the afternoon would arguably create a backlog for the following working day and risk the delivery of our excellently GRO's KPT performance as outlined in *section 3*.

#### **5. Options**

5.1 The following options have been developed following on from the review of legislation, Medical Examiner arrangements and engagement with the Registrars Team.

Option 1: Develop a voluntary remote working on-call duty rota for Saturday, Sundays and Bank Holidays 9.30am – 12.30pm.

- 'Green forms' can be issued in this time with no death certificates issued due to remote working. Full death registrations and the issuing of death certificate would need be handled as per current practice as a priority on a Monday morning.
- A duty phone would be made available at the number made available to funeral directors and to residents via the councils website. The duty phone will be switched on and answered 9.30am-12.30pm only with voicemails responded to the following working day from 9.30am.
- The duty Medical Examiner works 9.30 – 11.30am but there have been regular occurrences of this running over and the hours proposed reflect this.
- In accordance with Council Terms and Conditions, on duty staff would be paid a £25 standby payment per day. This would cover the first hour worked with remaining time worked paid at time and a half.
- There are concerns regarding operational difficulties of this option, i.e. incorporating further weekend working requirements using the current staffing levels. Forecasted costs do not include any potential increased payments to staff for unsocial working.

Option 2: Develop a voluntary remote working on-call duty rota for Sundays and Bank Holidays (apart from Christmas Day and New Years Day), 9.30am – 12.30pm. Saturdays would entail working at Chadderton Town Hall 9.30am – 12.30pm to issue death certificates to enable the full death registration and for bodies to be moved out of England subject to the Coroners approval.

- 'Green forms' can be issued on Sundays and Bank Holidays.
- A death certificate can be issued in person on a Saturday 9.30am – 12.30pm with urgent appointments made available.
- When a wedding ceremony is booked in on a Saturday, 2 Registrars are based at Chadderton Town Hall. 2 Registrars are required to undertake a wedding ceremony. Moving forward on such days, this will be extended to 3 registrars. The additional registrar would undertake administrative tasks and can carry out a full death registration if required allowing for the death certificate to be issued.
- To accommodate this option, it is proposed that the registrars structure be amended to incorporate increased working hours for Registrars at Grade 4 from the current 5.5fte to 6.16fte (24 hours) with 2 x additional 12-hour contracts. This will allow for the service to remain open throughout the year on Saturdays with a minimum of 2 staff working for health and safety purposes and enable increased cover over the weekend period for ceremonies.
- On a Sunday and Bank Holiday in accordance with Council Terms and Conditions, on duty staff would be paid a £25 standby payment per day. This would cover the first hour worked with remaining time worked paid at time and a half. On a Saturday, Registrars will receive normal working pay 9.30am – 12.30pm. Staff are on antisocial hours bandings.

Option 3: Develop voluntary remote working on-call duty rota for Sundays and Bank Holidays 9.30am – 12.30pm. Saturdays would entail working at Chadderton Town Hall 9.30am – 12.30pm to issue death certificates and reduce opening hours during Monday – Friday to offset to partially offset the costs of implementing the Saturday aspect of the new weekend arrangements.

- The service operates in person Monday – Friday 9am – 5pm at Chadderton Town Hall. Hours would be amended to Monday – Friday – 9am – 4.20pm with the 40 minutes per day put towards weekend hours.
- This option is not suitable as it would add a backlog of appointments that will impact on KPTs.
- The cost of this option would be minimal is nil on Saturday due to a change in opening hours. Sundays and Bank Holidays would be paid a standby payment of £25 plus time worked above an hour.

5.2 The preferred option is Option 2. This provides the potential for a full death registration to be carried out between 9.30am – 12.30pm on a Saturday with ‘green forms’ issued during the same hours on Sundays and Bank Holidays. There is little value being available past 12.30pm as a duty Medical Examiner would not be available to support the issuing of a ‘green’. Safe working procedures can be followed on a Saturday with Registrars in the building. This option also mitigates risk factors affecting staff as increased grade 4 hours to the structure plus the use of casual officers will spread the requirement for weekend working across a greater pool of staff.

## 6. Consultation

6.1 No conflict of interest has been identified.

## 7. Implications

Financial	<p>The preferred option (option 2) is to Develop a voluntary remote working on-call duty Rota for Sundays and Bank Holidays (apart from Christmas Day and New Years Day).</p> <p>To accommodate this option, it is proposed that the registrars’ structure be amended to incorporate increased working hours for Registrars at Grade 4 from the current 5.5fte to 6.16fte (24 hours) with 2 x additional 12-hour contracts.</p> <p>On a Sunday and Bank Holiday in accordance with Council Terms and Conditions, on duty staff would be paid a £25 standby payment per day. This would cover the first hour worked with remaining time worked paid at time and a half.</p>
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	<p>On a Saturday, Registrars will receive normal working pay 9.30am – 12.30pm. which includes an antisocial hour banding allowance.</p> <p>The cost of this proposal is circa £32k, which will be met from within the registrar’s income, following a fees and charges review as part of the 2025/26 budget setting process.</p> <p style="text-align: right;">(Matthew Kearns, Finance Manager)</p>
<p>HR</p>	<p>Following the move of the Registrars Service to Customer Services in October 2024, a service review of out of hours death registration has taken place.</p> <p>HR are fully sighted on this proposal and have discussed it in detail with the Assistant Director of Customer Experience and Registration Services Manager.</p> <p>There are no proposed changes to terms and conditions. If the preferred option is agreed, both permanently employed Registrars and casual Registrars will be asked to volunteer to work on a Sunday and Bank Holiday and will receive an on-call payment. The proposed option entails increasing the current establishment of Grade 4 Registrars from 5.5fte to 6.16fte to cover 2 Registrars staff being available to work for 3 hours on a Saturday.</p> <p>The preferred option is supported to provide the service with greater resiliency to deliver their core functions. At present overtime is being used alongside casuals to handle this and a more permanent arrangements as outlined in the preferred option is needed to accommodate sickness and holidays.</p> <p>It should be noted as part of this proposal that the Registration Service Manager has been undertaking the additional tasks/call out with no additional pay to date. It is recommended that there should be a backdated payment of £2000 from 1<sup>st</sup> April reflecting weekend on call hours and time worked over an hour.</p> <p style="text-align: right;">(Rebecca Jones, HR Manager)</p>
<p>Legal</p>	<p>The Preferred option is supported. The service has been performing very well, above the Northwest benchmarking figures, this is a credit to the staff in the team and their manager. It is, however, unreasonable for the Council to expect the additional work out of hours by the team manager to continue to be covered in effect out of her good will.</p> <p>It is important that the service is suitably aligned to the needs of the residents in the Borough, and it is clear there is need for out-</p>

	<p>of-hours service, therefore a permanent solution as alluded to in the report is required.</p> <p>Should the preferred option not be supported, it would be unreasonable to expect staff to continue unremunerated in offering an out-of-hours service.</p> <p>(Alex Bougatef, Interim Borough Solicitor)</p>
Equality impact including implications for Children and Young People	<p>The proposals will make access to the issuing of death certificates easier and more timely for all residents, particularly those from Oldham's diverse minority ethnic communities where faith/religious beliefs require the funeral to be held within a set time, or where the deceased is to be moved out of England. An Impact Assessment has been completed and is included in <i>Appendix C</i>.</p> <p>(Amanda Richardson, Policy Manager)</p>

Has the relevant Legal Officer confirmed that the recommendations within this report are lawful and comply with the Council's Constitution?	Yes
Has the relevant Finance Officer confirmed that any expenditure referred to within this report is consistent with the Council's budget?	Yes
Are any of the recommendations within this report contrary to the Policy Framework of the Council?	No

Background Papers under Section 100D of the Local Government Act 1972

None

Report author sign-off	Fran Lautman
Role	Assistant Director of Customer Experience
Date of sign-off	23 January 2025

<b>Approval</b>	
Officer approval sign-off	Steve Hughes on behalf of Shelley Kipling 
Role	Assistant Director of Strategy & Performance
Date of sign-off	21.02.25

<b>Approval</b>	
Member(s) approval sign-off	Cllr Chris Goodwin 
Role	Cabinet Member for Don't Trash Oldham
Date of sign-off	20.01.25

## Appendix A – Benchmarking Summary

	Green forms issued out of hours?	Full death registration offered out of hours?	Saturday on call arrangements	Sunday on call arrangements	Bank Holiday on call arrangements	Summary of out of Hours Arrangements
<b>Bolton</b>	unknown	unknown	unknown			No information available.
<b>Bury</b>	yes	no	Registrations Manager on call throughout			An emergency certificate for burial can be issued out of hours between Friday 4.30pm and 9am Monday. Contact is the Emergency Duty Team. The Registrations Manager then receives the contact. There are also 3 Muslim community representatives.
<b>Manchester City Council</b>	yes	no	9am-12pm	10am – 2.30pm		Email the service and the need for an urgent burial with URGENT FAITH DEATH in the subject line.
<b>Oldham</b>	yes	no	Registrations Manager informally on call 9am – 12pm			Funeral Directors and 2 Muslim community representatives call the Registrations Manager directly.
<b>Rochdale</b>	yes	no	10.30am – 12.30pm			Issue of green form only, no death certificates.
<b>Salford</b>	yes	no	10am-12pm			Issue of green form only, no death certificates.
<b>Stockport</b>	yes	no	10-12pm			
<b>Tameside</b>	yes	yes	9am – 2pm			Urgent death certificates can be issued, on call set-up.
<b>Trafford</b>	yes	no	9am – 12pm			Issue of green form only, no death certificates.
<b>Wigan</b>	yes	unknown	On call throughout			On call system available from office closure 4.30pm to opening following morning during week and 9am to following morning Saturday and same Sunday

## Appendix B – Monday – Friday opening hours

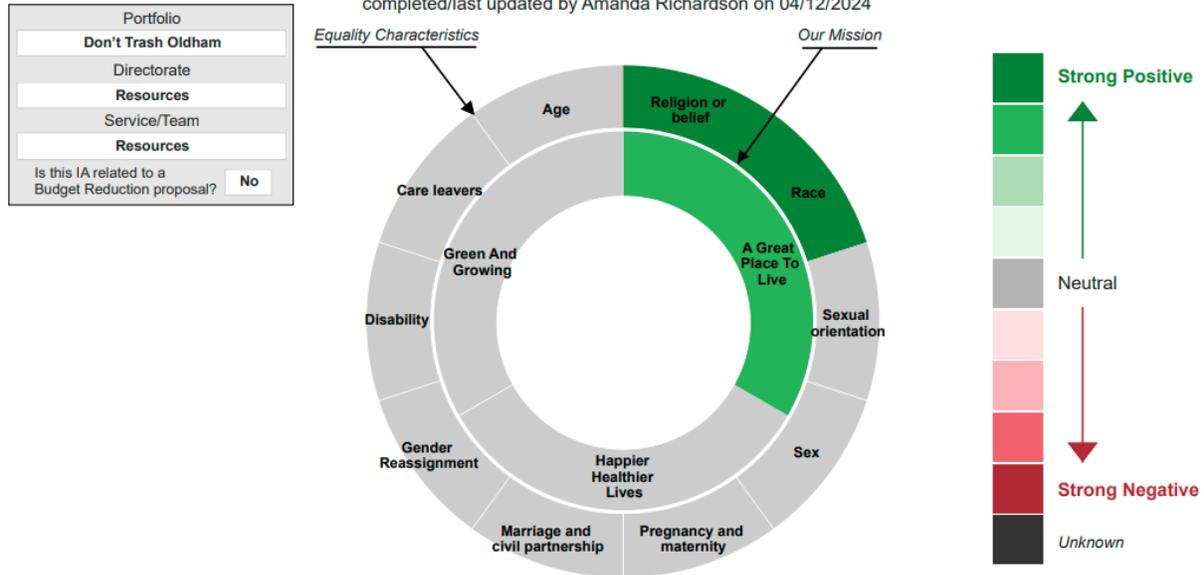
Council	Weekly Opening Days	Opening Times	Daily opening hours
<b>Bolton</b>	Monday - Friday	9am - 4pm	7
<b>Bury</b>	Monday - Friday	9am - 4.30pm	7.5
<b>Manchester City Council</b>	Monday - Friday	8.15am - 3.30pm	7.25
<b>Oldham</b>	Monday - Friday	9am - 5pm	8
<b>Rochdale</b>	Monday - Friday	9am - 4.15pm	7.25
<b>Salford</b>	Monday - Friday	8.30am - 4.30pm	8
<b>Stockport</b>	Monday - Friday	8.30am - 4.30pm	8
<b>Tameside</b>	Monday - Friday	9.30am - 4.30pm	7

Trafford	Monday - Friday	9am - 4pm	7
Wigan	Monday - Friday	9.30am - 4.30pm	7

## Appendix C – Equalities Impact Assessment

### Out of Hours Arrangements for Registrars

completed/last updated by Amanda Richardson on 04/12/2024



#### Equality Characteristics

Category	Impact	Likely	Duration	Impact Score	Comment
Age	Neutral	Very Likely	Long Term	0	
Care leavers	Neutral	Very Likely	Long Term	0	
Disability	Neutral	Very Likely	Long Term	0	
Gender Reassignment	Neutral	Very Likely	Long Term	0	
Marriage and civil partnership	Neutral	Very Likely	Long Term	0	
Pregnancy and maternity	Neutral	Very Likely	Long Term	0	
Sex	Neutral	Very Likely	Long Term	0	
Sexual orientation	Neutral	Very Likely	Long Term	0	
Race	Strong Positive	Very Likely	Long Term	8	The proposals will make access to the issuing of death certificates easier and more timely for all residents, particularly those from diverse minority ethnic communities where faith/religious beliefs require the funeral to be held within a set time, or where the deceased is to be moved out of England for the funeral. Hence the proposals are more strongly positive for this group.
Religion or belief	Strong Positive	Very Likely	Long Term	8	The proposals will make access to the issuing of death certificates easier and more timely for all residents, particularly those from diverse minority ethnic communities where faith/religious beliefs require the funeral to be held within a set time, or where the deceased is to be moved out of England. Hence the proposals are more strongly positive for this group.

#### Our Mission / Corporate Priorities

Category	Impact	Likely	Duration	Impact Score	Comment
Green And Growing	Neutral	Very Likely	Long Term	0	
Happier Healthier Lives	Neutral	Very Likely	Long Term	0	
A Great Place To Live	Moderate Positive	Very Likely	Long Term	4	Increasing out of hours access to the registrars will support all residents at a difficult and stressful time and better meet the cultural, religious and faith needs of Oldham's diverse communities. Working with this resident focus will foster a sense of belonging and pride in place.

