



# MANAGING THE SAFETY OF GRAVE MEMORIALS

Within Cheshire East managed cemeteries

2025

## **CHANGE LOG & VERSION CONTROL**

Version	Approval date	Author	Description
v1.1	25/09/25	P.Brightwell	Review and update of the memorial safety policy

This document should be considered a live working procedures manual. It is subject to a rolling annual review with core amendments approved through current schemes of delegation culminating in authorisation by the Head of Environmental Services, with approval for any updates needed from Place Directorate Management Team (DMT).

This document will be stored in a central location where it is accessible as a reference guide for all Service users to view.

# **CONTENTS**

EXEC	UTIVE SUMMARY	3
1.1. 1.2. 1.3.	1: BACKGROUND Aim of the Policy Proportionate Risk Management The Councils Legal Responsibility & policy framework Scope of the Policy	3 4 5 6
2.1. 2.2. 2.3. 2.4.	2: MEMORIAL RISK MANAGEMENT POLICY Recording and Implementation Inspection process Evaluation of Risk Heritage and aesthetic value Staff Responsibilities Externally procured masonry resource	6 6 7 7 8 9
3.1 3.2 3.2.1 3.2.2 3.3 3.3.1 3.3.2 3.3.3 3.3.4	3: INSPECTION PROCEDURE  Memorial Inspection  Memorial Assessment: Stage one - Initial visual observation  Structural categorisation  Structural condition check  Risk Categorisation  Push testing – Small memorials  Large or complex memorials  Confirmation of memorial instability  Memorials lacking heritage or aesthetic value  Memorials with defined heritage or aesthetic value	9 10 10 11 11 11 12 12
PART 4.1 4.2 4.3 4.3.1 4.3.2 4.3.3	Remedial measures Low Priority Medium Priority	13 13 14 14 15
<b>5.1</b> Co	5: COMMUNICATION APPROACH ommunication of the Policy ommunication channels	17 17
FIGUE	RES	
Fig1:	Memorials categorization in Cheshire East cemeteries	14

#### **EXECUTIVE SUMMARY**

The purpose of this update to the councils Memorial Safety policy is to reflect a clarification on the position of the decision process concerning large or complex memorials where a failure to establish contact with the memorial owner leads to a necessity for remediation costs to be incurred by the council.

The Memorial Risk Management Policy is to enable the Council to discharge its legal duty of care for the management of memorial safety, using guidance issued by the Ministry of Justice (*Furthermore MoJ*) towards the development of a risk-based approach that ensures Local Authorities and other Bereavement Services operators can develop a reasonable and proportionate approach to the management of memorial safety in their cemetery sites.

The MoJ guidance was jointly developed by a sub-Group of the Burial and Cemeteries Advisory Group, which advises the MoJ on aspects of burial law and aims to assist burial ground operators towards implementing systems to control the risks from memorials to their employees, contractors, friends of groups, volunteers and members of the public.

The sub-Group represented burial ground operators, memorial masons and cemetery Managers along with the Health and Safety Executive and consulted with the insurance sector and Local Government employers.

The responsibility for the maintenance and upkeep of memorials generally sits with the living relatives of the deceased to which they are erected, although the Local Authority acting as the burial authority and also as the duty holder under the relevant health and safety statutes has powers to take action to mitigate severe risk associated with any unsafe vault, tombstone or memorial in the interests of public safety.

#### Part 1: BACKGROUND

## 1.1 Aims of the policy

The guidance factors industry specific statistical analysis which suggests limited numbers of fatalities are linked to issues of memorial safety and that the risk of suffering serious injury is generally considered to be low<sup>1</sup>.

<sup>&</sup>lt;sup>1</sup> Ministry of Justice, Managing the safety of Burial Ground Memorials Practical advice for dealing with unstable memorials, 2009, p3

This policy aims to address the potential risk posed by unsafe memorials whereby this guidance sets out how the Council will;

- a) Identify and manage the risk posed from unstable or falling memorials to a reasonable level through the application of a consistent, proportionate, riskbased approach.
- b) Establish and maintain a centralised system of recording and reviewing memorial inspections and damage reports that includes the retention of records of the inspection and assessment process, noting those memorials where risk must be managed and details of any remedial action.
- c) Establish a system for procuring specialist support for any remedial action where an initial visual check reveals defects beyond the capabilities of Cheshire Easts Bereavement Services operational staff.
- d) Take steps to identify liability and to contact memorial owners in the event of the need for repairs to make safe.
- e) Where the Council acts, to take account of the cost of control measures towards applying the most appropriate action to mitigate public safety concerns and to consider the preservation of any intrinsic heritage or prominent aesthetic value.
- f) Ensure aspects of performance and quality assurance processes are set in place in relation to managing risk derived from memorials within its sites that meet minimum statutory requirements for Safety, Health and Environmental quality.
- g) Provide direction to ensure competency of the staff undertaking inspections aligned with this guidance.
- h) Improve the confidence and trust of the borough's residents, elected Members, partners and broader stakeholders in relation to the Council's responsibility in relation to the management of memorial safety.

## 1.2 Proportionate Risk Management

Despite the overall risk to public safety from memorial collapse generally considered to be low, the Council has a duty of care to manage that risk and aims to do so in a proportionate way that balances the benefits and costs of risk reduction.

This guidance sets out the approach to managing memorials within the Council's cemeteries by managing risk to a level that is as low as reasonably practicable (ALARP).

This will be achieved by undertaking a cyclical process of memorial inspections that will direct remedial action in a proportionate and cost-effective manner by prioritising those areas where exposure to risk is considered to be most significant.

On the basis of a low overall perception of risk of harm, a reasonably practicable approach to managing memorial safety would not involve a detailed assessment of every single memorial on a regular basis. Nor should excessive remedial measures be implemented without first assessing the level of risk to determine the most appropriate level of intervention.

The Health and Safety Executive Inspectorate may be called upon to investigate serious incidents, including fatalities, and will seek assurance that operators have taken the sort of sensible, risk-based precautions set out in the guidance issued by the MoJ.

It is accepted by the HSE Inspectorate that very occasionally, even when all reasonably practicable precautions have been taken, incidents may still occur.

## 1.3 Councils Legal Responsibilities & policy framework

There is a duty of care which stipulates that operators of burial grounds must adopt safe systems of working to control the risks that memorials pose to their employees, contractors, Friends groups, volunteers and members of the public.

While the responsibility for the upkeep of graves and memorials typically lies with those who register ownership, local Authorities must regularly inspect memorials, maintain records, take steps to engage with the public to manage risks appropriately and where appropriate to take action to make safe any memorials where it has not been possible to establish ownership and a liable party to action any necessary remediation.

These responsibilities and legal permission to undertake works are underpinned by several key pieces of legislation linked to burial grounds that include the; <a href="Local government Act 1972">Local Authorities' Cemeteries Order 1977</a>. There are also statutory duties under core health sand safety legislation that include the <a href="Health and Safety at Work Act 1974">Health and Safety at Work Regulations 1999</a>, and the Occupiers' Liability Act 1957.

Further duties are outlined within the <u>Ministry of Justice Guidance on</u> <u>Managing the safety of Burial Ground Memorials 2009</u> ensuring that where reasonably practicable, operational activities are undertaken to diminish the exposure to the health and safety risk factors of staff, contractors and cemetery visitors.

Industry specific technical guidance includes the National Association of Memorial Masons (*NAMM*) Code of Working Practice, and the British Register of Accredited Memorial Masons (*BRAMM*) Blue Book, which promotes the application of *British Standard BS8415:2018* for the stability and inspection of memorials (*annex A*), along with the technical competency of externally registered fixer masons.

## 1.4 Scope of the Policy

The Council will adopt a risk-based and proportionate approach, with memorial risk management integrated into the councils Bereavement Services operational management practices and aligned with the councils broader Health and Safety policies.

An effective risk-based approach will feature assessment of relevant risk factors to ensure cost effective remediation that will satisfy the requirements of the relevant safety policies inclusive of the Health and Safety at Work Act 1974 and the Management of Health and Safety at Work Regulations 1999 and the associated Approved Codes of Practice.

#### PART 2: MEMORIAL RISK MANAGEMENT POLICY

## 2.1 Recording and Implementation

Inspection findings will be captured on a memorial inspection database that will record the details of all memorial risk assessments and will include the following key details:

- Date of inspection and the name of the inspector
- Unique identification of each memorial with any available reference to its section location, name of the deceased, owner and any contact details to notify those who may be required to undertake repairs.
- A record of the memorial category and condition and details of any push testing. Noting any significant hazards and referencing an estimate of the number of people who may be exposed and a risk rating factoring the likelihood and severity of any perceived hazard. To include any photographic references.
- Note of any prioritisation to remediate, i.e. those memorials that are large or complex, judged to be of a high risk of collapse, that are in areas of heavy use or are of significant heritage value.
- Record of any remedial action either taken or proposed.
- Timescales for any further assessment will be repeated if the memorial is scheduled to be monitored

## 2.2 Inspection process

The inspection process will address all memorials where there is a visible cue to initiate assessment towards prioritising remedial resource to those memorials considered most likely to present the greatest risk that would include:

- Memorials over 59" / 1.5m in height:
- Large multi-component memorials with unusual structural features e.g. crucifixes or pillars;
- Memorials featuring a narrow, damaged or undermined base;

- Memorials situated on uneven or sloping ground;
- · Memorials close to throughfares or roadways;
- Memorials close to other memorials of historical or local interest or that otherwise show signs of frequent visitation;
- Memorials close to areas with evidence of anti-social behaviour.

#### 2.3 Evaluation of risk

Cheshire East Bereavement Services will apply the '5 Steps' approach to assessing risk and satisfies the requirement to carry out risk assessments as outlined in the Management of Health and Safety at Work Regulations 1999:

- 1) Identify the hazard potential for memorial instability that could lead to personal injury or worse.
- 2) Identify who may be at risk and how Operational staff, contractors and visitors within the cemetery grounds
- 3) Evaluate the level of risk and determine necessary control measures
- 4) Record significant findings of the Risk Assessment.
- 5) Review the Risk periodically and update control measures and records as required or following an incident.

Larger memorials are determined to be unsafe on the memorial inspection register when one or more visual signs of defect, including leaning to one side, basal undermining or subsidence or other structural defects are confirmed by a suitably qualified external fixer mason and for smaller memorials where visual signs are confirmed with movement from a constant hand pressure that could lead to toppling.

The following criteria will allow determination of the level of risk in relation to the likelihood and severity of personal injury to cemetery users.

- Size categorisation, whereby larger and more complex memorials are considered to pose a more significant hazard
- Location;
  - Proximity to pathways, roadways or thoroughfares including known shortcuts and desire lines.
  - Proximity to other memorials of historical or local interest or that otherwise show signs of frequent visitation.
  - o Proximity to areas with evidence of anti-social behaviour.
  - Situated on sloping or uneven ground.

## 2.4 Heritage and aesthetic value

Following characterization of a memorials physical properties and the magnitude of any hazard and once the proximity to cemetery users has been evaluated to determine the perceived likelihood of personal injury, and any heritage value or

aesthetic prominence will be factored in a cost benefit analysis towards establishing the most suitable approach to remediation. Where necessary qualified advice should be sought towards the determination of any relevant heritage or cultural value that could include listed monuments and war graves.

A cost benefit analysis would indicate the most appropriate form of remediation for memorials situated in areas of visual prominence including the vicinity of chapels, crematoriums and the periphery of cortege routes. This process would ensure any remedial approach is aligned with the preservation of the broader aesthetic appeal of such areas towards enhancement of the services ongoing commercial viability.

This process would take into account efforts to either retain a memorial in a close approximation of its original structural form as is reasonably practicable in contrast to the consideration of alternative measures that would potentially be more visually impactful that are centred around partial or full dismantling to make safe.

For larger memorials deemed absent of any relevant heritage or aesthetic value, remedial efforts would default to more primitive and cost-effective measures ensuring any obstruction that the memorial could pose in a dismantled form is minimised.

## 2.5 Staff responsibilities

Memorial safety inspections for smaller memorials within the size capability of internal staff will be carried out by two operatives working as a team comprised of staff trained to the National Association of Memorial Masons (*NAMM*) Inspection & Safety Assessment of Memorials with task specific competency reviewed annually.

For larger memorials beyond the technical capabilities of the internal Cheshire East Bereavement Services staff, externally sourced masonry fixer resource accredited to the British Register of Accredited Memorial Masons (*BRAMM*) Scheme or equivalent would be procured to undertake the assessment.

Externally procured masonry agents must evidence valid Public Liability and Indemnity insurance cover of no less than five million pounds that would indemnify Cheshire East Council against any claims arising from acts or omissions in the undertaking of their duties.

The appropriate use of Personal Protective Equipment (*PPE*) is covered by the Personal Protective Equipment Regulations 1992 (as amended) and stipulates that the appropriate PPE must be worn at all times during the assessment and remediation process.

Plant, machinery or other heavy equipment to be utilised during the process should be in good serviceable condition with any relevant certification in accordance with the Lifting Operations and Lifting Equipment Regulations (LOLER) and the Provision and Use of Work Equipment Regulations 1998 (PUWER).

## 2.6 Externally procured masonry resource

For works to larger memorials that are determined to be outside of the councils' operational capabilities, any external masonry resource must provide a drawing or schematic of the proposed works which must be approved by the relevant Cheshire East Cemetery office along with payment of any necessary fees or surcharges.

Materials used in the remediation or construction of any memorial shall be natural stone or other quarried material with no artificial, synthetic, wooden or metallic structures permitted. No monument may be erected, modified, dismantled or any inscription made without prior validation of the necessary accompanying documentation, competencies and insurances by the relevant Chesire East council Cemeteries office.

## Part 3: INSPECTION PROCEDURE

#### 3.1 Memorial Inspection

The Inspection procedure will be undertaken using a two stage process that will evaluate factors that would contribute directly to memorial instability and to further categorise the memorials to determine the extent of any heritage or prominent aesthetic value:

- A cyclical process of observation to identify perceived hazards associated with the different types of memorials currently installed throughout Cheshire East managed cemeteries sites factoring their placement, size, construction, material type and structural condition.
- 2. Assessment of memorial risk following initial inspection with determination of any necessary remediation as appropriate to the level of risk posed, along with a secondary consideration for any heritage or aesthetic value that a particular memorial may exhibit.

## 3.2 Memorial Assessment: Stage one - Initial visual observation

## 3.2.1 Structural categorisation

The formal inspection process begins with a visual check to determine what features are present and to categorise the memorial as either small or large and of a more complex construction.

This categorisation helps identify smaller and more simplistically structured memorials that can be addressed by operational staff versus those larger structures that are considered to pose an inherently higher level of risk and which may require outsourcing to a specialist, competent masonry contractor for further analysis and to allow for a cost benefit analysis of any remediation proposal.

A memorial is categorised as large or complex when the following features are present:

- A height to base ratio more than 3:1 with height of more than 59" (1.5m);
- Unusual or complex structural features, constructed from multiple components typified by Crucifixes or Obelisk type structures.

#### 3.2.2 Structural condition check

Once the memorial has been categorised by size, a visual condition check is undertaken for signs of defect that would suggest the likelihood of instability that could include;

- Visible leaning from a vertical plane;
- Obvious structural defects including slipped or dislodged components, fractures or material peeling;
- Ground conditions and any evidence of basal undermining or subsidence.

For smaller memorials with a height to base ratio of less than 3:1 or height under 59" (1.5m) where a visual inspection reveals one or more factors indicating damage or weakness due to joint failure or general instability, the findings will be recorded on the inspection register and a push test will be undertaken.

For larger memorials with a height to base ratio of more than 3:1 or height above 59" / 1.5m, such as crucifix or obelisk type structures, the push test is not appropriate and further assessment is to be undertaken by a suitably qualified externally sourced masonry engineer to validate any initial visual concerns of instability.

For any memorial situated within a consecrated section of a graveyard, war grave section or for any listed memorials the relevant permission or Faculty

notice will be sought and actioned prior to commencement of any proposed inspection and remediation works.

#### 3.3 RISK CATEGORISATION

## 3.3.1 Push testing – Small memorials

For suitable smaller memorial types, a push test will be carried out to validate suspected instability as indicated from the initial visual inspection stage towards determining the appropriate steps for remediation.

Inspection operatives are to exercise caution for memorials comprised of multiple sections or blocks and must push test the upper sections first to avoid inadvertently dislodging loose material that could cause personal injury.

Where the push test reveals a memorial to be stable, no further action will be taken other than to record the findings on the inspection register as inconclusive and for the memorial to be reviewed again in the default 5 year timeframe for any further changes in structural appearance.

In the event of further reports highlighting concern around the structural integrity of the memorial, the default 5 year inspection interval would be disregarded whereby a further inspection would be undertaken at the time of reporting.

Where a small memorial shows signs of defect, e.g. sloping significantly, basal undermining, subsidence or other structural damage and also moves with a constant hand pressure that would suggest it could continue to fall with the potential for personal injury to cemetery users in the vicinity, the memorial will be recorded as unsafe on the memorial inspection register.

Assessment of the proximity of the small memorial to any access routes, thoroughfares or otherwise heavily trafficked area of site that could suggest an elevated likelihood of injury to cemetery users would be recorded on the memorial inspection register towards defining the level of perceived risk.

#### 3.3.2 Large or complex memorials

For larger memorial types above 59" or 1.5m where a push test is not appropriate, specialist externally sourced masonry resource will undertake further assessment towards:

- Validating initial visual concerns of suspected instability, and;
- Offer recommended remediation options to make safe factoring costs to dismantle or to remediate in a close approximation of the current form as is reasonably practicable.

Where the external stone masonry resource concludes a memorial to be stable, no further action will be taken other than to record the findings on the inspection register as inconclusive and for the memorial to be reviewed in the default 5 year timeframe for further changes in structural appearance.

In the event of further reports highlighting concerns around the structural integrity of the memorial the default inspection period would be disregarded a further inspection would be undertaken at the time of reporting.

Large memorials will be risk rated factoring proximity to access routes, thoroughfares or otherwise heavily trafficked areas of site that would suggest an elevated likelihood of personal injury for memorials that are encountered by a greater number of cemetery users. In such instances consideration will be given to the erection of interim barrier measures to limit the proximity of cemetery users to any unsafe memorial.

## 3.3.3 Confirmation of memorial instability

Where external masonry resource confirms initial visual suspicions of defect for a large memorial, e.g. significant leaning, basal undermining, subsidence or other structural damage and confirms there to be a valid potential for personal injury to cemetery users in the vicinity, the memorial will be recorded as unsafe on the memorial inspection register along with any recommendations for remediation.

## 3.3.4 Memorials lacking heritage or aesthetic value

For large memorials where there is no apparent heritage value or aesthetic prominence linked to their proximity of chapels or to the periphery of cortege routes, more primitive remedial efforts are proposed towards either full or partial dismantling.

Dismantled components would be placed in such a manner so as not to restrict accessibility around the memorial and dependent on the size and weight of components and the level of complexity to dismantle, there may be scope to undertake the works using the councils Bereavement Services staff instead of commissioning external masonry resource. Options may include;

- The memorial could be 'Monolithed' by either sectioning or setting in its entirety into the ground in a vertical plane
- Where space permits, the entire memorial or parts thereof could be laid flat and recessed into the ground to limit disruption to grounds maintenance operations and to avoid a tripping hazard to cemetery users.
- In extreme circumstances, leaning memorials or those with basal instability could be staked, pinned or anchored with mechanical support added (either concrete, metal or wooden bracing) where no other reasonable alternative exists.

## 3.3.5 Memorials with defined heritage or aesthetic value

For large memorials with an identifiable heritage or aesthetic value, or that are otherwise situated along the periphery of cortege routes or within close proximity of chapels, an individual cost benefit analysis of mitigation options as proposed by the external masonry assessor.

This will allow for the consideration of potentially more costly remediation techniques focused on retention of a memorial in a close approximation of its original form in the interest of preserving the aesthetic character of a particular section of a cemetery.

#### Part 4: MITIGATION MEASURES

## 4.1 Temporary measures – Hazard signage and barriers

For all memorial irrespective of size or level of risk, notices will be displayed on those individual memorials identified as being unsafe to warn cemetery users of the potential hazard when in close proximity.

Responsibility for maintaining individual memorials sits with those who erected them and the warning notices will contain contact details to direct the memorial owner to the relevant cemetery office to arrange for the necessary repairs to be undertaken.

Prior to any remedial action to memorials within consecrated, or war grave sections of a cemetery, inspection operatives must ensure that the relevant permission of Faculty notice is in place and that any mandatory requirements have been actioned prior to commencement of works.

## 4.2 Grave ownership - Notification period

A nominal period for all memorials of 12 months to coincide with the likelihood of familial visitation covering a full calendar year of anniversaries and other commemorative dates associated with the deceased will be allowed for registered grave owners to respond and to make contact with the council to initiate repairs to make their memorial safe

During this period the council will undertake monthly monitoring of any unsafe memorial for signs of change in risk profile.

Should the contact period elapse without any response from the grave owner, the council can utilise powers under the <u>Local Authorities Cemetries Order 1977</u><sup>2</sup>

<sup>&</sup>lt;sup>2</sup> 1977/204 (as amended)

to intervene and progress remedial action to make a memorial safe should it see fit and would aim to do so within the 6 months following the notification period. Any such costs associated with the remediation efforts would be sought from the grave owner should contact eventually be established.

Should a grave owner be dissatisfied with the authority's decision to categorise their particular memorial as unsafe along with the request for arrangements to be made for suitable remediation, a meeting can be arranged at the cemetery where a further inspection of the memorial can be witnessed with clarification offered around how and why the memorial was classified in relation the memorial safety policy as being unsafe.

#### 4.3 Remedial measures

Memorials will be categorised to determine a response priority factoring the level of risk along with any need to consider the conservation, heritage or aesthetic value.

Memorial	Risk factor: Proximity to paths /	Heritage /	Intervention
size	roadways or other heavily	aesthetic	level /
	trafficked areas	value	priority
Any	Yes	Y/N	High
Large /	No	Υ	High
complex			
Large /	No	N	Medium
complex			
Small	No	N	Low

#### 4.3.1 Low level of intervention

For small memorials indicating a positive push test that would suggest a risk of toppling but that are located away from thoroughfares or heavily trafficked areas of site, there is considered to be a low likelihood of personal injury to cemetery users. These memorials will have a warning sign attached and would be monitored monthly for signs of further deterioration.

Should the twelve-month notification period elapse, the memorial would be reassessed to determine any additional degradation. If the memorial has remained in the same condition, no further action would be taken beyond rescheduling for reassessment in a further 24 month period.

The above approach to retain memorials in their pre-existing state is supported by the Health and Safety Executive and the Ministry of Justice whereby it is

acknowledged that it is acceptable to avoid measures that would see the widespread laying flat of memorials where there is no demonstrable level of risk.

#### 4.3.2 Medium level of intervention

Large or complex memorials considered to be unsafe and that have no demonstratable heritage or aesthetic value and that are not situated near to walkways, roadways or thoroughfares value will be designated as a medium intervention category.

In addition to safety signage to notify cemetery users of the potential risk of personal injury associated with collapse, the peripheral area around such large or complex memorials would be cordoned off with hazard warning tape or Herris fencing panels as appropriate to restrict access during the 12 month notification period while efforts are made to make contact with the memorial owner.

If the memorial owner makes contact during the notification period, the necessary repairs would be arranged and the council notified to approve. Upon validation of completion by the council, the memorial safety register would be updated and the memorial set back into the nominal five year inspection cycle.

Should the twelve month contact period elapse with no contact, the memorial would be reassessed to determine any further degradation. Assuming the memorial has remained in a similar condition a decision would be taken for council to enact its powers under the <u>Local Authorities Cemetries Order 1977</u><sup>3</sup>, to implement cost effective remediation measures aimed at partial of full dismantling by a suitably qualified third party to mitigate the perceived risk.

#### This could include:

- The memorial could partially disassembled with the upper portion to be 'Monolithed' by setting in a vertical plane into the ground
- The memorial or parts thereof could be laid flat where space permits and recessed into the ground to limit disruption to grounds maintenance operations or to avoid a tripping hazard to cemetery users
- In extreme circumstances, mechanical support could be added to the memorial (either concrete, metal or wooden bracing) where no other reasonable alternative exists.

Any remedial action would be recorded on the memorial safety register and the memorial would be reverted back to the nominal 5 yearly inspection cycle.

## 4.3.3 High level of intervention

For memorials in close proximity to thoroughfares of walkways where there is considered to be a greater likelihood of personal injury, the peripheral area

<sup>&</sup>lt;sup>3</sup> 1977/204 (as amended)

around such memorials would be cordoned off with hazard warning tape or Herris fencing panels to restrict pedestrian access during the 12-month notification period while efforts are made to make contact with the memorial owner

If the memorial owner makes contact during the notification period, the necessary repairs would be arranged and the council notified to approve. Upon validation of completion by the council, the memorial safety register would be updated and the memorial set back into the nominal five year inspection cycle.

Should the twelve month contact period elapse with no contact, a decision would be taken for council to enact its powers under the **Local Authorities Cemetries**Order 1977<sup>4</sup>, towards determining the most appropriate remediation measures to mitigate the perceived risk.

In the six months following the notification period, externally qualified masonry resource would be procured to offer remedial proposals in readiness for the Service to undertake a cost benefit analysis to determine the most appropriate remediation measures. These would factor the commercial and reputational aspects that would take into account more costly restorative measures versus partial of full dismantling to mitigate the perceived risk. Such measures that could be undertaken would include:

- For small memorials where there is a risk of falling forwards and is considered large enough to cause personal injury, it could be staked & the headstone secured with banding to limit further leaning. In line with MoJ Guidance, staking of larger headstones would be avoided to limit the risk of further inadvertent damage.
- Partial of full laying flat of the memorial aiming to retain visibility of any inscription where immediate action is considered necessary and where no other alternative is considered suitable.
- Procurement of suitably qualified external masonry resource to undertake specialised repairs beyond the capabilities of in house Bereavement Services operatives to undertake restorative restoration of memorials where preservation of any prominent heritage or aesthetic value is warranted.

Any remedial action would be recorded on the memorial safety register and the memorial would be reverted back to the nominal 5 yearly inspection cycle.

<sup>&</sup>lt;sup>4</sup> 1977/204 (as amended)

#### 5.0 PART 5: COMMUNICATION APPROACH

## 5.1 Communication of the policy

Communication of the inspection and remediation process will be undertaken in a sensitive manner, ensuring any messaging is delivered compassionately to balance the acknowledgement of the underlying safety concern with that of the emotional significance of individual memorials to the families of the deceased.

#### 5.2 Communication channels

Communication outreach would include a series of approaches aiming to increase public awareness of any proposed testing schedule or remedial works. Individual notices on unsafe memorials would warn cemetery users of the immediate hazard in their periphery and direct memorial owners to the relevant cemetery office resource.

Additional signage explaining the safety policy would be deployed at site entrances and on notice boards as applicable, directing cemetery users to view the policy in an accessible format on the Councils Bereavement Services website.

Notice boards would also offer the opportunity to brief cemetery users about any larger scale remedial interventions that may temporarily disrupt accessibility to certain parts of the cemetery and help to reassure that any measures are both temporary and preventative in their nature.

Direct engagement to the last known rights-holder associated with the grave owner notification period would outline the nature of any safety issue and include the inspection findings, any interim action taken and what if any steps are proposed to make a memorial safe and any outline timescales.

Internal outreach would include toolbox talks and staff briefings ensuring Bereavement Services operatives undertaking the memorial inspections and remedial works are aligned with the approved practices.



## Appendix 1 – Risk Register

**Example Risk Register Template** 

Unique	Memorial	No of	Perceived			Inherent	Current/Existing			Residual	Proposed	Proposed review
Ref	Description	individuals	Consequences			Risk	Controls			Risk	Mitigation	date
		impacted										
				L	S			L	S			