



# **Policy for the Management of Memorials**

February 2023  
CHISELDON PARISH COUNCIL

## **POLICY FOR THE MANAGEMENT OF MEMORIALS**

### **Introduction**

Chiseldon Parish Council owns and manages the Butts Road Cemetery and the Sir Henry Calley Memorial Ground in Chiseldon. The Butts Road cemetery was opened in 1877 and is still in use, and the Sir Henry Calley Memorial Ground was opened in the 1980s and is still in use. There is a range of memorial types exhibited in the Butts Road Cemetery, with some Victorian full memorials, up to modern lawn-type headstones. The Sir Henry Calley Memorial Ground features mainly law-type headstones and cremated remains memorials. It is estimated that there are approximately 1200 memorials in the Butts Road cemetery, and 110 in the Sir Henry Calley Memorial Ground.

Burial authorities are expected to ensure that the memorials in their cemeteries are safe and do not pose a risk to anybody visiting or working in the site. Older memorials may be neglected and can become worn and damaged over time, thus presenting a danger. Relatively new memorials may be equally as dangerous, however, if they were poorly fixed and are now loose on their foundations.

Chiseldon Parish Council has adopted this policy for the Management of Memorials in its cemeteries.

The policy covers 2 distinct categories:

- A. Existing Memorials
- B. Future Installations

### **A. Existing Memorials**

Chiseldon Parish Council recognises that memorials can become unstable and consequently pose risks to the health and safety of members of staff, cemetery visitors, funeral directors, mourners, contractors and stone masons working in the cemeteries.

In order to comply with its duty of care under the Health and Safety at Work Act 1974 the Council intends to embark on a systematic programme of inspection of all memorials, and removing the risk from those that are deemed to present a danger to those working in or visiting the cemetery.

This policy supplements the Chiseldon Parish Council's corporate health and safety policy and the general cemeteries health and safety policy.

The strategic aim of this policy is to make the cemeteries safe places for staff, mourners and all others who may visit or work in the cemeteries.

The regime of inspection and actions has been formulated using the advice contained in the Institute of Cemetery and Crematorium Management's Code of Practice for the Management of Memorials, the Ministry of Justice's Managing the Safety of Burial Ground Memorials and British Standard 8415, with adaptations to suit local conditions. All staff involved in the inspection programme will have received appropriate training from the ICCM regarding inspections, and appropriate training in the safe use of any lifting or other appropriate equipment from the

supplier of such equipment. Specialist consultants may be used to carry out the testing in place of cemetery staff.

## **Communications**

Chiseldon Parish Council recognises that adverse publicity could be attracted if the reasons for the inspection regime and subsequent actions are not properly communicated to the public prior to the commencement of the programme. To counter this, notices will be placed in prominent places around the cemetery and at the cemetery gates for a minimum of 2 months before the programme start date. The notices will explain what is happening and why, and will provide contact details for those wishing to find out more. Those who wish to witness their memorial being tested may do so. Articles will also be placed in the local press and in any suitable Council publications that are widely distributed in the area. Information will also be placed in the relevant section of the Council's website.

It is not deemed feasible or desirable to try and contact every grave owner prior to the commencement of the programme. Experience in other authorities has shown that such attempts attract a very small return rate for such a costly exercise, and that publicity in local media and within the cemetery is more effective.

## **Authorisation**

It will be necessary for Chiseldon Parish Council to obtain a Faculty from the local Diocese for the inspection and safety works in the consecrated sections of the cemetery. A copy of the Management of Memorials Policy will be submitted with the Faculty application, together with reassurances that memorials will be treated with decency and sensitivity. The Faculty, if granted, may contain conditions required by the Bishop that the Council must comply with.

## **Responsibilities**

Chiseldon Parish Council recognises its duty of care under the Health & Safety at Work Act 1974 with regard to the provision of safe places of work for members of staff and the extension of this duty to include the safety of members of the public and others visiting or working in their cemeteries.

The supervision of the memorial management programme will be the responsibility of the Parish Clerk.

The owners of memorials have a responsibility to maintain their property.

## **General Risk Assessment**

A general site risk assessment with regard to memorials must be the starting point for the memorial management system. The following factors have been considered for the cemeteries:

### Sizes of Memorials Present

It is reasonable to state that the height and size of a memorial directly relates to its potential to do harm. A memorial over 1 meter in height has the potential to cause a death should it fall on an unsuspecting person whereas a modern lawn memorial of 1 meter or under may not cause a death but could cause serious injury. Therefore it would follow that the major hazards are

represented by those memorials over 1 meter in height and that these should be inspected and dealt with at the start of the inspection programme. Once these memorials have been inspected and those found to be unstable are made safe a second sweep of memorials less than 1 meter will be commenced.

It is considered that memorials over 2.5 meters in height will require detailed inspection by a structural engineer. However, staff carrying out inspections will carry out a full visual examination of these memorials and cordon off any that show signs of potential instability. Staff carrying out inspections will not be able to carry out stability tests on such memorials by virtue of their size.

#### Frequency of Visitation by the Public

It is reasonable to state that in a heavily visited cemetery the potential exists for more people to come into contact with potentially unstable memorials. It follows that volume of visitation must be considered when planning the inspection regime.

#### Level of vandalism

The level of vandalism in the cemetery has been considered, taking in account that there have been a number of reported deaths of children who have been killed by falling memorials whilst playing in UK cemeteries. The action of vandals can also give rise to the possibility that their activities may have caused an increase in the number of potentially dangerous memorials. Level of vandalism has been assessed for the cemeteries with due consideration then being made in the general risk assessment for the sites.

#### Cemeteries Risk Rating

Chiseldon Parish Council owns and manages 2 cemeteries, Butts Road Cemetery and Sir Henry Calley Memorial Garden. The cemeteries feature consecrated, and unconsecrated sections, and are laid out in a series of sections defined mainly by roads and paths.

The following risk matrix indicates the general assessments made for the cemetery in relation to memorial size, visitation and vandalism.

SITE	Memorials above 1 meter	Memorials 1 meter and under	Visitation	Vandalism	Site Risk Rating	NOTES
Butts Road Cemetery	4	2	3	2	<b>2.75</b>	Larger proportion of older memorials which in general were constructed to a higher standard. No recorded acts of vandalism
Sir Henry Calley Memorial Garden	2	4	4	2	<b>3</b>	Higher overall risk as most recent interments in higher quantities therefore more visitors. No recorded acts of vandalism.

Note: 1= low risk, 5=high risk

## **Inspection Regime**

The initial inspection regime will be divided into the following phases with each phase being conducted in the oldest sections first, followed by the most visited sections:

1. Inspect and make safe where necessary all memorials between 1.0 meter and 2.5 meters in height and visually inspect only all memorials over a height of 2.5 meters with cordoning off of those considered to be hazardous.
2. Simultaneously (if possible) with 1 arrange inspection of all memorials over a height of 2.5 meters by a structural engineer and remove the risks from any identified as being hazardous via the use of a specialist company. If this is not possible the cemetery manager and safety officer could inspect these memorials and come to an agreed decision on any action required.
3. Inspect and make safe where necessary all memorials of 1 meter and under.

The inspection of each memorial will include a full visual assessment, hand testing for stability (on memorials under 2.5m), recording of findings, immediate actions taken and future actions required.

The testing of each memorial, including those found to be in a good and stable condition, will be recorded following which the records will be input onto the office administration system for production of work-lists for follow-up actions and notification to grave owners.

## **Inspections**

### **General**

A systematic process will take place from section to section using appropriate statutory plans in order to ensure that all memorials receive appropriate attention.

All inspectors will receive full and comprehensive training in the processes of visual inspection and testing of memorials. If specialist consultants are used, Chiseldon Parish Council will ensure that they are appropriately qualified and experienced and carry adequate public liability insurance.

Each memorial will receive a full visual inspection in order to alert the inspector to any potential problems prior to testing taking place. The results of a visual inspection of a memorial are used to assess the risks that might be posed by that particular memorial. The opinion of the inspector is confirmed or otherwise by the physical testing.

In certain circumstances, and in accordance with findings, memorials may be categorised for re-inspection. Re-inspection categories are discussed later in this document.

Inspectors will test only those memorials under a height of 2.5 meters. Memorials over 2.5 meters will only receive a full visual inspection by inspectors with any immediate action required being limited to cordoning off pending inspection and receipt of qualified advice from a structural engineer.

Following visual inspection of a memorial it will be tested by hand by the application of a steady, increasing pressure to a maximum force of 25kg. This test force of 25kg is currently the industry accepted standard for existing memorials. Those undertaking memorial inspections will receive training and will have a 'muscle memory' of the force required to achieve 25kg.

Specific guidance and information with regard testing of memorials is contained within the risk assessment and safe system of work which follows later in this document.

On finding an unstable memorial immediate action must be taken in order to eliminate the hazard or prevent any person coming into contact with the hazard pending its elimination. Immediate actions could include laying flat, use of a temporary support or cordoning off, but consideration will be given to the severity of the risk and the likely impact the action will have on the appearance of the cemetery and the potential to cause distress to mourners.

The cordoning off or supporting of a memorial is considered to be a temporary solution with further action being undertaken at the earliest possible opportunity to eliminate the hazard. The Council will place a sign on the cordoned off memorial asking any visitors to contact the office so the situation can be explained. The Council will also write to the registered grave owner, wherever possible, to advise them of the state of the memorial and make recommendations for how this should be resolved.

A general risk assessment relating to inspectors is contained in the following table.

**It should be noted that members of the public and others are exposed to the risks identified in items 1 – 6 in the table. The actions identified \* in the table will eliminate or significantly reduce risk to members of the public and others.**

## Memorial Inspection Risk Assessments

HAZARD	RISK	TYPE OF INJURY	ACTION TO REDUCE / ELIMINATE RISK
1. Unstable vertical structure	Fall of structure <b>Risk is increased in relation to size of structure</b>	Impact / crush / fatality <b>Severity increases in relation to size of structure</b>	<b>Stand to side when testing.</b> <b>Check area and make sure visitors, other workers etc are not in the vicinity</b> <b>*Take and record immediate action to prevent any person coming into contact with hazard.</b> <b>Report and record any further actions that are required to eliminate the risk.</b>
2. Detached components	Trip	Impact injuries	<b>Vigilance. *Stack detached components on landing/foundation</b>
3. Small memorials (tablets, vases etc)	Trip	Impact injuries, sprains	<b>Vigilance. *Grass cutting</b> <b>*Raise / erect on slab</b>
4. Uneven ground	Trip	Impact injuries, sprains	<b>Vigilance. *Report subsidence for re-instatement</b>
5. Glass jars	Trip/Fall onto glass object/ Risk of breakage	Cuts, lacerations	<b>Log items for removal. Report for removal. (Regulations)</b>
6. Unauthorised memorials, fences etc	Trip/Fall onto fences	Impact injuries, puncture wounds from fall onto fence	<b>Log items. *Report for removal (Regulations)</b>
7. Aggressive behaviour	Physical assault	All categories of injury	<b>Vacate area. Report to senior manager.</b> <b>Complete incident form.</b> <b>Public awareness campaign relating to memorial management.</b>

**Personal Protective equipment:** Wear safety boots or shoes at all times. Safety Helmet to be worn when visually inspecting memorials over 2.5 meters in height. Protective gloves to be worn when handling memorial components or glass objects.

### **Visual Inspection**

Prior to any physical testing of a memorial a full visual examination must take place. This examination will alert the inspector to any possible faults, which may indicate that the memorial will fail the stability test and thus lead the inspector to take a cautious approach. Unless a full visual inspection is carried out prior to testing the possibility exists for the memorial to fall suddenly on the exertion of minimum pressure thus causing the inspector to fall also.

The visual inspection should take into account all joints, kerbs and corner posts where present, angle of lean, cracks and faults, condition of inscription, whether hard or soft stone, ground conditions and action of nearby trees.

It should be noted that a memorial may appear perfectly fine on a visual inspection, but exhibits enough movement to render it unsafe on a hand test. This is particularly the case on lawn type memorials, where it is not always possible to tell how the headstone is fixed to the base, nor the base to the foundation. Conversely, a memorial may be leaning and have cracks between the joints, but does not move under a hand test. A visual inspection alone is therefore not a rigorous enough test to proclaim a memorial as safe or unsafe.

### **Testing**

All memorials up to a height of 2.5 meters will be tested for stability by inspectors. All memorials above 2.5 meters in height will receive visual inspection only with immediate action limited to cordoning off pending further inspection by a structural engineer.

The hand test will be the primary test for stability. Should a mechanical device be used this should only be used as a confirmatory test on memorials that have passed the hand test. A mechanical device can be used to calibrate hand test pressure in order to achieve parity. An increasing pressure should be applied to a vertical structure up to a maximum of 25kg force, being the industry recommended maximum pressure applied to existing memorials.

Inspectors must wear appropriate safety footwear. A safety helmet should be worn when inspecting memorials over 2.5 meters in height and testing memorials between 1.5 and 2.5 meters in height.

The inspector must stand to the side of the memorial being tested and apply pressure towards the apex of the memorial in a steady forward motion. Memorials must never be pulled toward the inspector.

The inspector must remain vigilant and ensure that no other person stands within the radius of fall of a memorial being tested.

If a memorial moves under the hand test, and would continue to move and fall should pressure continue to be applied, the inspector must cease testing straight away and before reaching the maximum test loading. Such memorials will be deemed as unstable and will require immediate action. Immediate actions are detailed in the specific section below.

It is possible that some memorials may exhibit limited movement when the hand test is applied, but they would not fall if the pressure up to the maximum test loading continued to be applied. Such memorials are not unsafe, but the grave owner should be notified so that they can contact their memorial mason to have the memorial repaired if required.

Memorials that are found to be stable should be judged using the results of the visual inspection, current state of deterioration and possible further deterioration prior to placement in a re-inspection category.

Following inspection, each memorial will be placed in one of the following categories:

Category 1 – unsafe - immediate action to remove the risk is required

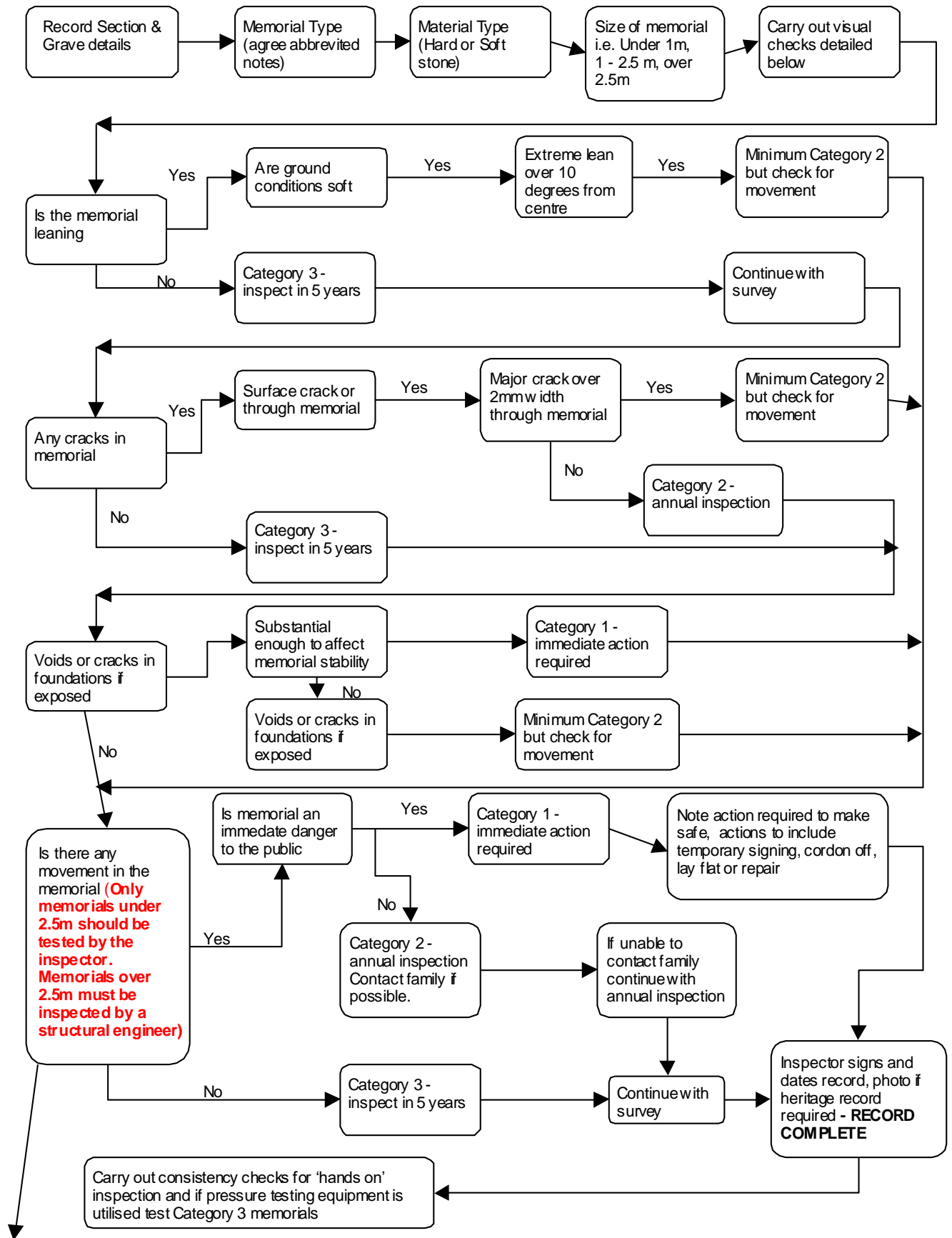
Category 2 – safe but some movement - reinspect in 12 months

Category 3 – safe - reinspect in 5 years

The flow chart contained on the following page expands the inspection regime and indicates factors affecting the placement of memorials in re-inspection categories.



## Inspection of Memorials – Flow Chart



**NOTE:** Full visual inspection only is made of memorials over 2.5 meters in height. Where visual inspection indicates that a problem may exist the inspector should take immediate action to cordon off pending full inspection by structural engineer. Structural engineer must inspect all memorials over 2.5 meters in height commencing with those identified by the inspector as possibly posing a hazard.

## Actions

### Immediate Actions

Whenever a memorial that poses an immediate danger is identified the Council must take immediate action to eliminate the hazard or prevent any person coming into contact with the hazard.

Immediate action is limited to cordoning off or installing temporary supports pending the use of lifting equipment. Inspectors and Council staff must only attempt to lift minor components of memorials.

Immediate actions must be recorded together with further actions that are required. This information will be used to compile work-lists for further actions designed to eliminate the hazards.

Immediate actions such as cordoning off or installing supports must only be considered as temporary measures and further actions as described below must be taken to eliminate the hazard.

It is in the best interests of the authority to carry out further actions required as soon as is practicably possible. Should a delay in taking further actions be experienced, supports or cordons that have been installed will require inspection to ensure continued security until such time as further actions are taken.

### Further Actions

The Parish Clerk will contact the registered owner of any grave to inform them of the stability problems and provide options for dealing with these. In the event that the owner cannot be traced, the Council may take further action to make the memorial safe.

Actions to make the memorial safe may include:

- Laying flat (this should be a temporary and last resort measure only)
- Re-erecting the memorial as a monolith, ie burying the lower third of the memorial in the ground
- Having a suitably qualified memorial mason re-fix the memorial to current industry standards
- If the memorial is derelict and beyond repair, a photographic record should be made and the memorial should be removed and destroyed.

Proper lifting equipment in the form of a gantry with block and tackle should be used to handle those memorials that have been identified by inspectors as being unstable.

Council staff will only tackle memorials of a height less than 2.5 meters. A specialist company will be contracted to make safe those memorials that are of a height greater than 2.5 meters that have been deemed unsafe by the structural engineer.

Only Council staff trained in the proper use of the gantry lifting equipment will be permitted to use such equipment. Records of inspection of the lifting equipment and lifting slings that are compliant with the Lifting Operations and Lifting Equipment Regulations will be kept and maintained by the supervising officer.

## B. Future Installations

In order to prevent future problems with unstable memorials, Chiseldon Parish Council has registered as a burial authority with the British Register of Accredited Memorial Masons (BRAMM). All Memorial Masons wishing to carry out work within Chiseldon Parish Council Cemeteries must be BRAMM registered. This requires that businesses selling memorials are registered with BRAMM, with registration being renewed on an annual basis if they continue to meet the business accreditation requirements. Individuals who actually fix or carry out repairs and restoration work on memorials must hold the BRAMM Fixer Licence, or must be supervised by a BRAMM Fixer Licence holder.

The aims of BRAMM are:

- To establish a recognised, uniform standard of workmanship and business practice throughout the UK
- To promote BRAMM accredited businesses and registered fixers
- To ensure all businesses, fixers and burial authorities on the BRAMM register follow current health & safety guidelines to protect both the public and their employees
- To ensure that BRAMM businesses give a guarantee of the stability of their memorial
- To ensure the scheme will be effectively policed ensuring that acceptable standards of fixing are maintained
- To encourage ongoing training and education within the memorial masonry industry
- To promote a closer working relationship between memorial masons and burial authorities

For a burial authority to be a member of BRAMM they must demonstrate:

- Commitment to training – burial authorities should train their own staff to ensure they have a basic understanding of British Standard 8415 and relevant industry codes such as the BRAMM Blue Book and the NAMM (National Association of Memorial Masons) code of working practice. They should also ensure they are fully aware of burial and grave digging procedures, particularly where this could affect the stability of the memorial
- Compliance with BRAMM standards – burial authorities should ensure that any work that relates to memorial safety, e.g. provision of concrete beams, repair of memorials, removal and replacement of memorials etc. should comply with BRAMM standards or equivalent
- Compliance with the ICCM Code of Safe Working Practice – all burial and grave digging procedures should be carried out in accordance with ICCM guidance or equivalent, particularly in relation to the re-instatement of graves
- Monitoring of memorial masons – a degree of monitoring will be required by the burial authority, which is still directly responsible for maintaining safe sites. Staff should be aware of British Standard 8415, the BRAMM Blue Book, NAMM code of working practice or equivalent and should monitor the installation of memorials on a random basis. Risk assessments and safe systems of work submitted by memorial masons will be available to check on the BRAMM website but the authorities will be responsible for approving them or otherwise. The dismantling of memorials as a form of control, is discouraged and should only be carried out in exceptional circumstances. The disciplinary process will be available to burial authorities where masons fail to comply with burial ground standards

- Responsibility for local disciplinary procedures – registered and licensed masons will be expected to work to local management rules and regulations as well as the rules of BRAMM. Where any of these are breached, the burial authority will be expected to deal with the disciplinary process as they have direct responsibility for their own burial grounds. Any action taken should be reported to BRAMM head office
- Commitment to providing undisturbed ground or concrete beams for all new memorials, where this is possible – where it is feasible, the burial authority should provide sufficient room within the grave space to ensure memorials can be erected on undisturbed ground (never to be disturbed by burial) or provide a concrete beam to current industry standards. It is understood that this will not be possible on some old sections and where new rows have been started in new sections

Chiseldon Parish Council recognizes its commitments under the BRAMM scheme and is in a position to adhere to them.

For the Memorial Industry, the rules of BRAMM require that:

- Eligibility – any business or fixer who has been barred from performing work in any cemetery within the previous two years may be ineligible to be accredited within the BRAMM scheme. In these circumstances, each case will be considered individually. Businesses or Fixers must submit details of such disciplinary actions with their application. Failure to disclose details of disciplinary actions, which subsequently come to the attention of the BRAMM Board, may result in disciplinary action
- Insurance – every business must be covered for public liability insurance to the value of £5 million for any one incident. Similarly, employers liability insurance cover to the value of £10 million must be obtained
- Health & Safety policy – every business must be compliant with current health and safety legislation. Proof of compliance is required in the BRAMM business accreditation requirements documentation
- Risk Assessment – every business must be compliant with current risk assessment legislation for its practical work within its workshop, cemeteries and churchyards. Proof of compliance is required in the BRAMM business accreditation requirements documentation
- Written guarantee – every business must provide its customers with a written company guarantee which, at the very least, provides a stability and safety guarantee for a minimum of 10 years. (It is strongly advised that this is tied into a 5-year maintenance check.)
- BS8415 - every business is expected to have a copy of the British Standard “Monuments within burial grounds and memorial sites – Specification BS8415: 2005” (or updated version currently in force) on its premises, and understand clearly what it means
- BRAMM Blue Book - every business must have at least one copy of the current BRAMM Blue Book (available free of charge) on its premises and conform to it. It is also recommended that a copy of the current NAMM code of working practice is obtained. A copy of the Blue Book should be carried in any vehicles used for fixing. Masons must also ensure that they have evidence that all materials purchased in from wholesalers meet the standards defined within the BRAMM Blue Book
- Spot check visits - every business may receive a random visit from a BRAMM representative to ensure on-going compliance with the BRAMM rules and regulations. 48 hours notice will be given of an intended visit and the relevant documentation must be made available to the representative for inspection. The representative may also wish

to inspect the workshop to ensure that working practices, supplies, materials used, etc. are in line with current industry codes

- Burial authority - every business must provide details of any burial authority cemeteries where it normally works. BRAMM will apply for any references it considers relevant
- Disciplinary procedures – every business or individual listed on the BRAMM register is deemed to have agreed to fully comply with the disciplinary procedures and abide by its decision in all matters

All people who purchase the Exclusive Right of Burial in a grave plot, which includes the right to erect a memorial, will be issued with a leaflet advising them of their responsibility for ensuring the continued safety of any memorial on a grave.

The adoption of the BRAMM scheme and better information for grave owners will help to ensure that future memorial installations do not become problematic or unsafe.

### **Permits**

Chiseldon Parish Council operates a permitting system for the installation of memorials on graves within the cemetery. Memorial masons must submit an application for a permit to erect or carry out any work to a memorial on the form provided by the Council. The application must include details of the memorial, the proposed inscription and the fixing method, together with the permission of the grave owner. On payment of the appropriate fee the Council will process the application, and if all is in order, issue a permit to allow the mason to fix the memorial. Once the memorial has been erected, the mason must return the permit to the Council to demonstrate that it is in place.

### **Checks**

Once a permit has been returned by the memorial mason, Council officers will inspect the memorial to ensure that it has been fixed on the correct grave and to the correct standards. Any defects or issues with location will be notified to the memorial mason immediately, who must return to the cemetery as soon as possible to rectify any problems.

Once the memorial has been checked and proven to be satisfactory, it will be placed into category 3, ie to be inspected in 5 years. The category may be reclassified if any issues with the memorial become apparent during the 5 years, or if there is a further burial in the grave requiring the memorial to be removed and re-fixed.