



London Borough of Lewisham Bereavement Services

Memorial Safety Management Policy

Policy for the Safe Management of Memorials

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1.0 Introduction

1.1 The following document sets out Lewisham Borough Council's policy for the management of memorial safety within its cemeteries. The Authority currently has responsibility for the following cemeteries:

Ladywell & Brockley
Hither Green
Grove Park

2 Background

2.1 Following a Cemetery Risk Management Review in the summer of 2015, Lewisham Council's Bereavement Services developed a policy for the management of memorial safety and began the process of creating a risk rating action plan. The policy is based on guidance from the Ministry of Justice, Institute of Cemetery and Crematorium Management and onsite tuition training from a specialist training provider. Memorial inspections had been taking place prior to this but had not been adequately recorded.

2.2 Bereavement Services has acted to ensure that all new memorials installed within the cemetery are safe. This has included:-

- The introduction of a more rigorous procedure for memorial permit application approval, insisting upon the inclusion of professional diagrams with details of the installation method to be used for memorials of multi layered construction and consulting with industry recognised professionals.
- A deliberate move away from the use of old concrete beams for fixing lawn section type memorials, choosing instead to authorise the installation method of headstones with bases
- Ensuring all masons work to NAMM (National Association of Memorial Masons) standards and BRAMM (British Register of Accredited Memorial Masons) registration.
- Carrying out random onsite post-installation checks and permit compliance checks.

3.0 National Policy Guidance & Advice

3.0.1 The ICCM represents professionals working in burial and cremation authorities. Their guidance 'Management of Memorials' (2007) is a comprehensive guide to burial authorities responsibilities, offering a clear methodology for the management, inspection and making safe of memorials.

3.0.2 In 2006 The Local Government Ombudsman issued the Special Report – 'Memorial safety in local authority cemeteries'. This document reinforces much of the advice given by the ICCM, providing general guidance on memorial safety testing with the aim of reducing the risk of public offence, the focus being on taking reasonable steps to inform the public and memorial owners of the authority's intention to carry out safety testing. The authority

must also ensure adequate training of staff carrying out safety testing as well as having an adopted testing policy.

3.0.3 The NAMM (National Association of Memorial Masons) Code of Working Practice supports the British Standard BS8415 – 'Monuments within burial grounds and memorial sites' (2005). This standard sets out the requirements for checking the condition and stability of memorials and procedures for their inspection. The Standard supports the use of a visual inspection and/or hand test.

3.0.4 The Ministry of Justice's guidance 'Managing the safety of Burial Ground Memorials' (2009) states that operators should do all that is reasonably practicable to ensure that people visiting and working in burial grounds are not exposed to risk to their health and safety. It sets out a risk-based approach to memorial safety based on good practice guidelines. They advocate a sensible, proportionate and sensitive approach to managing risks in burial grounds and for carrying out remedial work to memorials to avoid unnecessary distress to the bereaved.

3.0.5 Ministry of Justice guidelines state that 'only when the memorial poses a significant risk, such as imminent collapse in a way that could lead to serious injury, does immediate action need to be taken to control the risk.' The routine staking of unsafe memorials is not recommended, however the option of temporarily making-safe may be considered to prevent a memorial being laid flat if a permanent repair is imminent. If a permanent repair is not imminent the use of warning signs or cordoning off of memorials is advised.

3.0.6 The HSE is clear that the risk associated with unstable memorials is real and cannot be ignored. In the event of an accident and subsequent investigation by the HSE it is important that their advice has been taken and the Burial Authority can demonstrate they have done all that is reasonably practicable to prevent incidents from occurring.

3.0.7 The Council is bound by the regulations within the Local Authorities Cemeteries Order 1977 and must manage memorial safety in line with these and those of health and safety legislation i.e. Health & Safety at Work Act 1974, Management of Health and Safety at Work Regulations 1999 and Occupiers Liability Act 1957.

4.0 Assessment of Risk

4.0.1 In recent years the safety of memorials has become the focus of attention due to a few serious incidents. However, both the HSE and The Ministry of Justice state that the risk of injury from a gravestone or other memorial, which has become loose and unstable, is very low. They say that action to manage risks in burial grounds, therefore, needs to be sensible, proportionate and undertaken in a sensitive way.

4.0.2 In the event of a serious injury it is likely that HSE inspectors would investigate. They will require evidence that the Council has followed guidance

and carried out a risk-based assessment of its burial grounds. They will consider whether a significant risk was foreseeable and whether reasonable and practicable measures were undertaken to control such risks.

4.0.3 As part of the risk assessment process it is necessary to carry out periodic inspections of each memorial within burial grounds and take measures to control any risk that may be identified. To help with this process a list of the most common types of memorial has been produced, along with codes corresponding to the most common cause of failure in these types of memorial.

4.0.4 In order to prioritise the first round of inspections, a risk based approach has been used. Visiting every plot in each cemetery and scoring it based on a series of ranked criteria, such as proximity to pathways, age, size and design of the memorials etc. The same system of scoring was applied to each of the cemeteries visited to ensure a consistent approach. This provides a clear prioritisation for the inspection work, all plots were given a low, medium or high risk rating, which was used to priorities the assessments over a rolling 5 year programme.

4.0.5 These site surveys are used to develop a 5 year rolling programme of inspections (Appendix 1). The Ministry of Justice guidance suggests it is for Burial ground operators to determine the frequency of inspections whilst the ICCM and NAMM advise inspections at least once every 5 years.

4.0.6 When taking action to make safe or repair memorials that are found to be unsafe, priority will be given to those memorials alongside or close to paths and main thoroughfares, memorials of historical or social importance, and memorials within highly visited sections. These memorials present the biggest risk in terms of potential injury to people visiting or working in the burial ground.

5.0 Lewisham Borough Council's Policy

5.0.1 The following section sets out Lewisham Borough Council's policy for the safe management of memorials in its cemeteries. The purpose of this policy is clarify the Council's position in all areas of memorial management including what procedures have been adopted for the treatment of memorials that are found to be unsafe.

5.1 New Memorials

5.1.1 All new memorials and all memorials re- erected following interment will be installed by a competent mason in accordance with the NAMM Code of Working Practice.

5.1.2 All memorial masons working in Council maintained burial grounds must agree to the terms and conditions of Lewisham Borough Council's regulations. An application to erect a memorial, add an additional inscription or carry out

other works must have been approved before any works on a memorial are permitted. The permit must be available for inspection during the installation.

5.1.3 All new memorials must conform to maximum size criteria relevant to individual burial sections. Details of specific restrictions are available from the Council on request.

5.2 Carrying Out Memorial Safety Inspections

5.2.1 Prior to commencing memorial safety inspections the Council will follow the notification procedure as set out under the Local Authorities Cemeteries Order (LACO) 1974. This includes notices around the burial ground and in local papers along with notification of Church of England and Commonwealth Graves Commission where required.

5.2.2 The Council will carry out safety inspections on all memorials in burial grounds managed by the authority. These inspections will be undertaken as part of a rolling programme in five yearly cycles.

5.2.3 All memorial safety inspections will be carried out by suitably trained individuals.

5.2.4 A record of all memorial inspections and the results of these inspections will be kept by the Council.

5.2.5 For memorials up to 1.5 metres, inspections will include both a visual check and a hand test. The hand test will be used to determine stability of the memorial. Even where a visual check reveals no sign of defects the hand test will be used to confirm that the memorial is stable.

5.2.6 The hand test will be carried out by standing to one side of the memorial and applying a firm but steady pressure in different directions, the recommended force to be applied being approximately 25kg. The hand test will be used to determine if or to what degree the memorial is unstable.

5.2.7 For memorials over 1.5 metres a visual check will be completed, if loose parts are suspected and they can be reached then a hand test on that part will apply. If the memorial is thought to be unsafe a memorial mason will be instructed to carry out a more detailed assessment. Where assessment of the memorial falls outside the experience of the memorial mason or where uncertainty remains regarding safety, a structural engineer or other suitably qualified professional will be instructed to inspect the memorial, the immediate action to make the memorial safe will be to cordon off the memorial to public access until further inspection.

5.2.8 Where memorials can be safely removed/ repaired through the use of a gantry, this work will be carried out by trained cemetery staff.

5.2.9 Mechanical force measuring equipment will not be routinely used to test the stability of memorials. Such equipment will only be used if the safety of a

memorial is in dispute. In these circumstances mechanical force measuring equipment may be used to confirm that the memorial is unable to withstand a force approximating 25kg and is, therefore, an 'immediate danger'. The equipment will also be used occasionally to ensure that each individual carrying out the testing has calibrated the level of force they are required to use, with the measuring equipment, to ensure consistency in testing.

5.3 Procedure For Contacting Grave Owners/Relatives of Deceased

5.3.1 At least 28 days prior to starting memorial safety inspections notices will be displayed at all main entrances and in prominent positions throughout the cemetery. These notices will detail what is being done, when it will be done and how people can obtain further information or raise concerns.

5.3.2 A press releases will be issued to a local newspaper at least 2 weeks in advance of the Council's intention to inspect memorials. Information will also be included within the borough's Lewisham Life publication.

5.3.3 For all memorials found to be unsafe, and where the grave owner/ interested party is known, a letter will be sent to them at their last known address informing them that their memorial has been found to be unsafe and providing details of the action needed to be taken. If after 3 months no response is received, a further letter will be sent giving the grave owner a further 3 months to carry out the work required to the memorial. The letter will state that if the required work is not carried out, cemetery staff will make the memorial safe on a permanent basis either by laying the memorial flat, partially burying it or carrying out repairs.

5.3.4 Where the grave owner or interested party have been contacted but are unwilling or unable to effect a repair, the memorial will be made safe by cemetery staff using one of the methods outlined above.

5.3.5 Timescales for the Council to permanently make safe memorials are dependent on the level of risk from the memorial. High risk memorials will be temporarily made safe immediately and permanently made safe within 6 months of the final deadline given to the grave owner, medium risk after 1 year and low risk after 2 years.

5.3.6 When purchasing grave rights new owners will be encouraged to keep the Council informed of any changes in address.

5.3.7 On consecrated ground the Council will notify the Church of England of the intention to inspect and test memorials and where required by them, obtain faculty permission for works.

5.3.8 Where appropriate the Council will notify the Common Wealth Graves Commission of the intention to maintain graves and keep them informed of any works to be carried out.

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5.4 Dealing with Unsafe Memorials

5.4.1 Ministry of Justice advice states 'only when the memorial poses a significant risk, such as imminent collapse in a way that could lead to serious injury, does immediate action need to be taken to control the risk'. Based on this advice when a memorial poses a significant risk one or more of the following actions will be taken:

- A safety notice informing people that the Memorial has been found to be unsafe and the action to be taken by the owner or interested party will be displayed on or near to the memorial.
- Fencing/cordoning off unsafe memorials may be necessary under some circumstances e.g. for very large memorials or where a significant number of memorials are unsafe within a specific area.
- Memorials will be laid flat if there is no other practical means of making the memorial safe or where the grave owner or interested party has requested it.
- Where a memorial can be made safe on a temporary or long term basis through a minor repair using a bonding agent, this will be done.

5.4.2 If large numbers of memorials are found to be unsafe within a section of a burial ground fencing of a whole area will be undertaken and signage displayed on the outside to inform visitors of the danger and contact details for further information. Fencing will be used to secure the area.

5.4.3 Where a memorial poses only a low risk a safety notice will be placed on it and the grave owner or interested party will be notified.

5.4.4 If visual checks identify a defect/ issue with a memorial, which the person inspecting does not feel sufficiently experienced or knowledgeable to deal with, a memorial mason or structural engineer will be called in.

5.4.5 Where, after at least six months from being found to be unsafe, the Council has been unable to contact the grave owner or interested party a decision will be taken as to how to make the memorial safe. Under these circumstances the memorial will be permanently laid flat or repaired. Where the grave owner or interested party has been contacted but they are unwilling or unable to have the memorial repaired, it will be laid flat.

5.4.6 If no grave owner can be found but a memorial is determined to be of heritage or amenity value, the Council may decide to repair a memorial. In these circumstances any relative being found in the future would be requested to pay the cost of the repair.

5.4.7 Where an inspection has found a memorial to be unsafe the Council will make no charge for permit applications from memorial masons to carry out repairs to that memorial (this does not include additional inscriptions).

5.4.8 Where kerbstones are found to be breaking apart and the grave space is generally in a poor state of repair the Council, under the Local Authorities

Cemeteries Order (1974) is permitted to remove the kerbs from the site and tidy the grave space. Where this is the intention, notices will be displayed on the grave space for a period of three months and letters sent to the last known address of the grave owner or the interested party.

6.0 Safe Systems of Work

6.1 Memorial Safety Inspections, Risk Assessments and Code of Practice.

6.1.1 All memorial safety inspections will be carried out by a suitably qualified person trained in accordance with the guidance provided by this policy and other relevant national guidelines.

6.1.2 Staff carrying out safety inspections must ensure they have the correct tools, equipment and protective clothing to carry out the task.

6.1.3 Inspections must not be carried out under adverse weather conditions or if temperatures fall below freezing.

6.1.4 Immediately prior to carrying out the inspection of any memorial the inspector must ensure that the area around the memorial is clear of all potential hazards, for example, loose memorial components, glass jars etc. Particular care should also be taken if the ground conditions are noted as poor or uneven.

6.1.5 If a memorial to be inspected is partially covered with vegetation this must be removed prior to inspection. This should be done with great care to avoid damage to the memorial and possible risks to safety.

6.1.6 For memorials up to 1.5 metres inspections will include both a visual check and a hand test. The visual check must be completed first and the results recorded on the memorial risk assessment form.

6.1.7 The hand test will be carried out by standing to one side of the memorial and applying a firm but steady pressure in different directions. The hand test will be used to determine if or to what degree the memorial is unstable.

6.1.8 Inspectors must ensure that their actions do not pose a hazard to other employees, visitors or themselves. When carrying out the hand test it is the inspector's responsibility to ensure that they and all other persons stand out of the possible fall area of the memorial.

6.1.9 Inspector must be vigilant at all times and consider their actions and omissions in respect of the health and safety of all users of the burial ground.

6.2 Memorial Safety Remedial Works

6.2.1 All works to make safe a memorial that has been identified as posing an immediate risk to health and safety will be carried out by a suitably qualified

person trained in accordance with the guidance provided by this policy and other relevant national guidelines.

6.2.2 The methods used to make safe memorials found to be of an immediate risk to health and safety are as follows: a) Installation of a temporary make safe structural support; b) Laying the memorial down; c) Cordoning off the memorial/s; d) Partially burying memorial in the ground e) carrying out a minor repair with a bonding agent;

6.2.3 Persons carrying out remedial works must ensure they have the correct tools, equipment and protective clothing to carry out the task. These tools, equipment and protective clothing must be made readily available.

6.2.4 All tools and equipment should be inspected prior to use. Any fault that should develop with any article must be reported immediately. The affected item must not be used until such time as a competent, authorised person has made full repairs.

6.2.5 Temporary make safe structural supports should be fitted according to the manufacturers guidelines. If due to the construction of the memorial the support cannot be fitted correctly then an alternative method of making the memorial safe should be used. Correct fitting of the structural support should not cause a trip hazard or create any other increased risk of injury.

6.2.6 When laying a memorial down a gantry should be used to lift any memorial that is considered too heavy to lift by hand. No person should attempt to lift or carry any item that they consider too heavy.

6.2.7 When laying a memorial down the risk of creating a trip hazard should be considered and all necessary precautions taken to reduce this risk e.g. resting memorial on timber packing, positioning of memorial in line with other adjacent memorials etc.

6.2.8 Before attempting to move any memorial the likelihood of any component parts of the memorial falling during the operation must be assessed by a competent person. Any loose or detached parts must be removed independently.

6.2.9 Where it is considered that Council staff cannot move a memorial safely the assistance of a specialist outside company or organisation will be engaged.

6.2.10 Where possible when laying memorials down a slight angle will be maintained using timber packing or by laying the memorial plate on its base to prevent the accumulation of water on the memorial face and the potential for long term damage to the inscription. The exception to this is crosses, which will be laid flat to prevent them from breaking in two.

6.2.11 When cordoning off a memorial the cordon will be around the fall area of the memorial not just the memorial as it stands.

6.2.12 The integrity of all temporary make safe works must be inspected regularly to ensure safety standards are maintained.

6.2.13 When partially burying an unsafe memorial in the ground at least 25% or 15" (380mm) (whichever is the greater of the height) must be below ground. When in place the soil around the memorial must be thoroughly consolidated. When measuring how much of the memorial is to be below ground the measurement is taken from the last joint, a new hand test will be undertaken to make sure the memorial is now safe after being partially buried.

6.2.14 In some circumstances it may be necessary to employ a specialist company or organisation to make memorials safe through repair, laying flat or partial burial. Under these circumstances the guidance in this policy and other relevant national guidelines will still be applicable.

6.3 General Health & Safety Requirements

6.3.1 The following section outlines general health and safety requirements relevant to the inspection and making safe of memorials found to be of immediate risk. Tools & Equipment

6.3.2 Mechanical and Electrical Equipment must not be interfered with by unauthorised personnel. Any fault that should develop with any article of machinery or equipment must be reported immediately to a Supervisor/ Manager. The affected item must not be used until such time as a competent, authorised person has made full repairs. Pre-start checks sheets will apply and all recording and repair records kept on site.

6.3.3 The operative must use the correct tools and equipment required to carry out a particular job as identified by Risk Assessment.

6.3.4 Tools and equipment provided must be suitable for the purpose.

6.3.5 Care is to be taken in the use of and laying aside of tools with sharp edges.

Lifting

6.3.6 No person should attempt to lift or carry any item that they consider too heavy. Assistance should be called for if there is any doubt whatsoever.

6.3.7 The correct lifting technique is as follows: Do not jerk or shove as twisting the body may cause injury. Lift in easy stages, i.e. from floor to knee then from knee to carry position. Reverse the lifting method when setting the load down. Hold weights close to the body. Lift with the legs and keep the back straight. Grip load with the palms of the hands, not with fingertips. Do not change grip whilst carrying. Do not let the load obstruct view. Ensure that the route to be taken is clear of obstructions before commencement.

6.3.8 All staff undertaking the testing and making safe of memorials must undertake manual handling training.

Protective Clothing

6.3.9 Suitable clothing must be worn to prevent snagging, strangulation and pulling.

6.3.10 Steel toe capped boots must be worn when carrying out any operation in a burial ground.

6.3.11 Gloves must be worn when handling any materials that may lead to abrasions, cuts, punctures, tearing or bruising.

6.3.12 Safety helmets must be worn when dealing with memorials over 1.5 metres in height.

Hazard Reporting

6.3.13 Staff must advise the Cemetery Office whenever damage to a memorial is reported e.g. vehicle collision or if it is suspected a memorial has become unsafe. Cemetery office staff must record these incidents and arrange for the memorial to be inspected as soon as practical.

6.3.14 It is the responsibility of every employee to report any hazard or potential hazard that he/she should notice. In the first instance the employee should, where it is safe to do so, remove the hazard or prevent any person from coming into contact with it. Should it not be possible to remove it immediately, the employee should report the fact to a supervisor/manager who will take the necessary action to remove the hazard.

6.3.15 All hazards should be investigated by a Senior Technician/ Supervisor or manager to evaluate risk and make any policy or risk assessment update.

Accident Reporting

6.3.16 All accidents and injuries, however slight, should be reported to a supervisor/manager, who will ensure that the details are recorded correctly. All accidents will be investigated by a supervisor/manager, and where findings indicate, a change in working practice will be made to prevent recurrence and the risk assessment will be reviewed.

6.3.17 All accidents causing an employee to be absent for more than 3 days must be reported to the enforcing authority.

6.3.18 All injuries must be reported as soon as practically possible and referred to occupational Health.

6.3.19 Employers and employees have a positive duty to protect the health and safety of members of the public who visit their burial grounds. Staff must be vigilant at all times and consider their actions and omissions in respect of the health and safety of visitors.

Appendix 1. Five Year Programme of Inspections

Grove Park Cemetery	
Plot	
A	
AA	
BB	
B	
C	
D	
K	
H	
E	
F	
W	
G	
GG	
Y&YY	
V	
U	
Z&ZZ	
M	
R	
S	
T	
Q	
P	
N	
NN	
PP	
J	
L	
X	
I	
Ladywell Cemetery	
Plot	
D2	
D1	
D4	
G1	
G2	
C1	
D3	
F	
E3	
B	
A	
H	
C2	
C3	
E1	
E2	

Brockley Cemetery	
Plot	
F	
E (Catholic)	
V	
G (No memorials)	
I1	
I2	
J1	
J2	
X	
Z	
H	
U1	
U2	
Y2	
Y1	
E (No memorials)	
B1	
A1	
AA	
C	
D2	
AB	
H	
G2	
D3	
W	
B2	
CC	
A (rosary)	
A123	
K	
L	
Q	
S	
M	
N	
T	
I/P	
D1	
Year 1	
Year 2	
Year 3	
Year 4	
Year 5	

Hither Green Cemetery	
Plot	
TT	
SS	
UU	
QQ	
VA	
HH	
YY	
ZZ	
EZ	
DZ	
FZ	
GZ	
HZ	
CZ	
AK	
BK	
CK	
DK	
LZ	
MZ	
M	
P	
T	
NN	
II	
H	
L	
K	
N	
MM	
I	
G	
GA	
CA	
JJ	
RR	
BB	
EE	
GG	
AZ	
KK1	
CC	
H	
E	
JZ	
KZ	
KK2	
KK3	
BZ1 (Private)	
BZ2 (public)	
A1	
A2	
B1	
B2	

D2	
D1	
C1	
C3	
C2	
F	
XX	
J	
U	
X	
R	
O	
OO	
S	
PP	
AA	
DD	
FF	
LL	
VV	
WW	
Z	
V	
W	
Y	
EE	
Year 1	
Year 2	
Year 3	
Year 4	
Year 5	