



Okehampton Town Council

## Okehampton Town Council Cemetery Memorial Management Policy

### Introduction

Okehampton Town Council owns and manages the Cemetery at All Saints Church, Okehampton, known as Okehampton Cemetery. The Cemetery was opened in 2008 and is still in use, with approximately 12 burials per year.

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.

Okehampton Town Council has adopted this policy for the Management of Memorials in its Cemetery.

The policy covers 2 distinct categories:

- A. Existing Memorials
- B. Future Installations

### A. Existing Memorials

Okehampton Town 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 Council's health and safety policies.

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

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 receive appropriate training 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, if necessary.

### Communications

Okehampton Town 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 on the Cemetery noticeboard and the

website for a minimum of 3 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.

It is not deemed feasible or desirable to try and contact every grave owner prior to the commencement of the programme.

#### **Responsibilities**

Okehampton Town 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 Town 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 Cemetery:

a. **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.

There is only one memorial stone that is over 1 meter in height in the Councils Cemetery. Future memorials will be restricted in height to be less than 1 meter.

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b. **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.

c. **Level of vandalism**

The level of vandalism in the Cemetery has been considered on the basis that there have been a number of reported deaths of children who have been killed by falling memorials whilst playing in cemeteries across the country. 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 Cemetery with due consideration then being made in the general risk assessment for the site.

d. **Cemeteries Risk Rating**

Okehampton Town Council owns and manages the Okehampton Cemetery at All Saints Church, as shown on the map at Appendix A. The Cemetery is un-consecrated and is laid out in rows with a path along one side.

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 |
|---------------------|-------------------------|-----------------------------|------------|-----------|------------------|-------|
| Okehampton Cemetery | One                     | All others                  | 3          | 1         | 3                |       |

Note: 1= low risk, 5=high risk

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### 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. There are no memorials over a height of 2.5 meters.
2. 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, 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 worklists for follow-up actions and notification to grave owners.

### Inspections

#### General

A systematic process will take place starting from the oldest 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, Okehampton Town Council will ensure that they are appropriately qualified and experienced and carry adequate public liability insurance.

The Town Clerk or nominated staff member will arrange for periodic re-inspection of a random sample of memorials in order to ascertain consistency amongst inspectors. Should discrepancies among inspectors be found, it may be necessary for re-inspections of all memorials to take place.

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.

Following visual inspection of a memorial it will be tested by hand by the application of a steady, increasing pressure. 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.

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

**Personal Protective equipment:** Wear appropriate boots at all times. 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.

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.

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A hand test, as recommended by the ICCM, will be used to establish the stability of memorials.

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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.

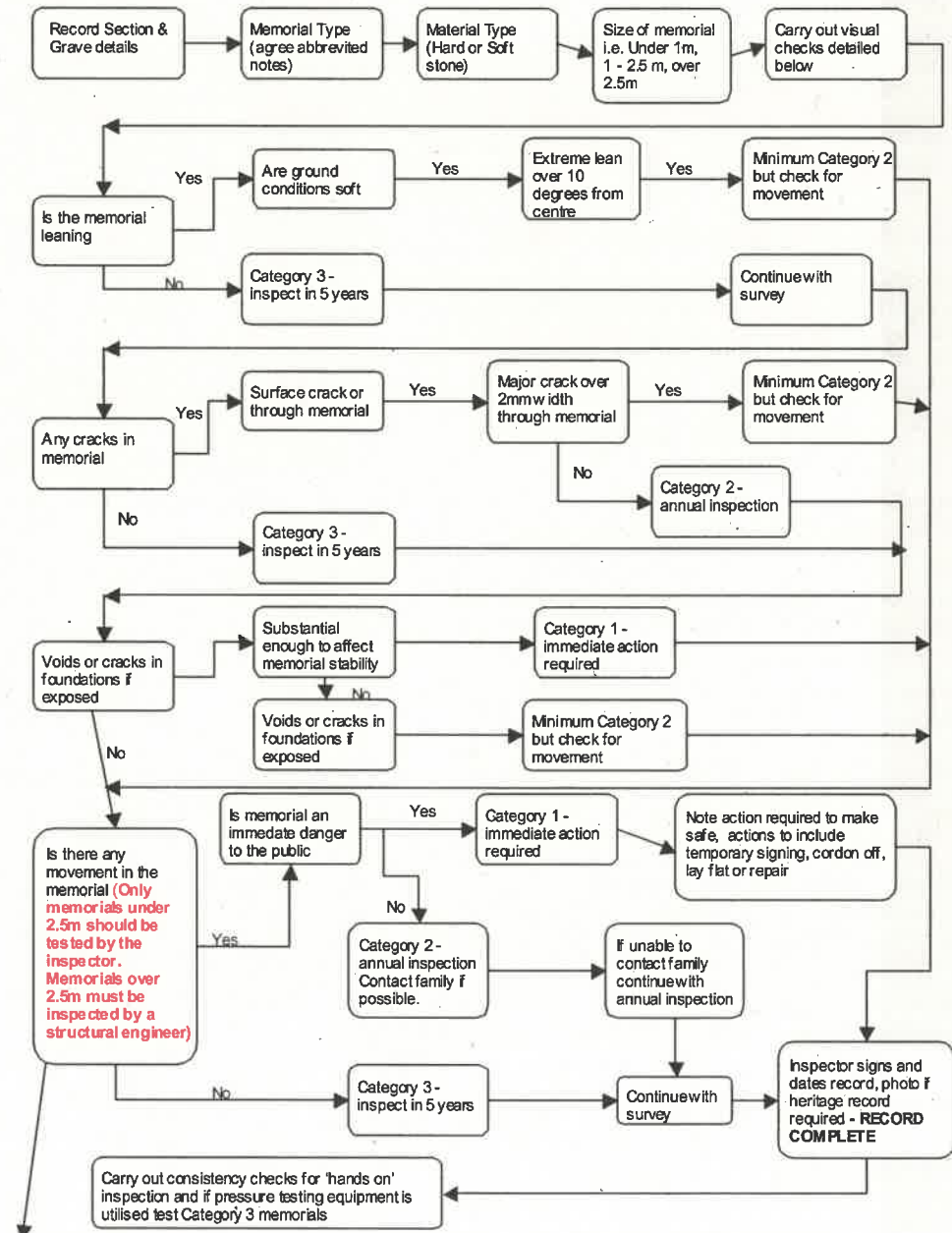
If a memorial moves under the hand test and would continue to move and fall should pressure continue to be applied, the inspector must cease testing straight away and before reaching the maximum test loading. Such memorials will be deemed as unstable and will require immediate action. Immediate actions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

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 inspector 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 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 worklists 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

Cemetery Administration staff 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 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 will be used to handle those memorials that have been identified by inspectors as being unstable.

Works staff will only tackle memorials of a height less than 2.5 meters.

Only works 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, Okehampton Town Council strongly recommends that Memorial Masons used to carry out work within Okehampton Cemetery are registered with the British Register of Accredited Memorial Masons (BRAMM). Accredited Masons can be found on the BRAMM website <http://www.bramm-uk.org/find-masons/>

Memorial Masons working within Okehampton Cemetery must:

- 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

- Health & Safety policy – every business must be compliant with current health and safety legislation.
- Risk Assessment – every business must be compliant with current risk assessment legislation for its practical work
- 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.
- 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)

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 brochure advising them of their responsibility for ensuring the continued safety of any memorial on a grave.

#### **Permits**

Okehampton Town 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.