



Memorial Safety Policy

Inspection of Memorials the closed churchyard at St Marys Church, Warmington and Broadgate Cemetery

1. **Introduction:** In respect of the Churchyard, this policy is to be read in conjunction with the diocese of Peterborough "Practice Direction 2012/01 – Testing of Memorials in Churchyards and Cemeteries." In particular the council should refer to paragraph 6 which negates the need for an individual faculty for each testing on condition that the council agrees to test memorials on accordance with Ministry of Justice guidelines.
2. The council has a duty under Health and Safety legislation to control the dangers that exist in the closed churchyard and the cemetery. Warning Signs/Notices/Cordons/Temporary Supports and other publicity alone will not necessarily protect the council's interests. The council must be actively working to remove the hazards posed by unstable memorials.
3. It is Warmington Parish Council's (WPC) intention to follow the latest guidance from the Institute of Cemetery and Crematorium Management (ICCM) and the Ministry of Justice on memorial safety and to take appropriate action to any memorial deemed unsafe within the cemetery or closed churchyard.
4. The owner of the memorial is responsible for maintaining the memorial in good condition and should be properly informed, in writing, of their and other party's responsibilities. Where owners cannot be traced the council has to decide how to deal with the memorial.
5. All memorials should be inspected on a minimum 5 yearly cycle. The inspection should be fully documented, identifying all dangerous or unstable memorials.
6. At least 28 days' notice will be given prior to the start of memorial safety inspections. Notices will be put up by the cemetery gates, with permission on the noticeboard at St Mary's Church, at the cemetery and on the WPC noticeboard, social media, and website. Notices will detail the intent of the council and the dates of the inspections. The diocese of Peterborough DAC secretary and Warmington churchwardens will be informed of inspections of St Marys churchyard and invited to attend.
7. **Risk Assessment:** Risk assessment is central to the memorial safety process and will be considered at all stages. The council's risk-based approach will include the following:
 - Knowledge of the different types of memorial currently installed in the burial ground. For example, through a site survey that identifies the various designs and materials of individual memorials and groups of memorials, their historical and social importance, and the likelihood of members of the public visiting or walking past particular memorials.
 - An overall assessment of the risks associated with these types of memorials to assist prioritisation of the more detailed inspections.
 - An inspection methodology for assessing the risk of each memorial, which might include:



- A visual check for obvious signs that a memorial is likely to be unstable.
- Where a visual check suggests no stability defects, a hand test can help confirm that assessment or identify stability problems – this test involves no tools or equipment and is intended to provide support to the visual checks.
- Arrangements for more detailed inspections of particular memorials where the initial inspection identifies significant risk, for example by a specialist structural engineer or memorial mason.

Occasionally there may be memorials that have serious structural faults but which the council decides not to remove or lay flat having regard to their aesthetic or heritage value. Specific assessments for each memorial and specific management measures may be required in these cases.

- 7.1. The council will use the Five Step approach suggested by the Health and Safety Executive for its risk assessment:
- a) Step 1: Identify the hazard - e.g. a potentially unstable memorial.
 - b) Step 2: Identify who might be harmed and how - employees, contractors, volunteers or visiting members of the public who may be struck by a falling memorial.
 - c) Step 3: Evaluate the risk of a memorial falling and harming someone and decide on the precautions needed to control this risk.
 - d) Step 4: Record the significant findings of the risk assessment and take steps to implement the precautions needed.
 - e) Step 5: Review the risk assessment periodically to see if anything has changed and update it if necessary.

- 7.2. Identifying the profile of risks from memorials: The council should use its experience and local knowledge to focus on those memorials most likely to present the greatest risk. The council should consider local factors, the design and style of memorial as well as environmental and historical factors.

The council will take the following into account to focus and prioritise the inspection and assessment process:

- Memorials alongside or within a short distance of paths are more likely to present a risk to visitors than those which are less accessible. Memorials of well-known people, or memorials widely appreciated for their architecture or aesthetic qualities are also more likely to attract visitors. Less frequented areas may attract anti-social behaviour or may need greater maintenance as relatives are no longer tending memorials. Memorials situated on sloping or uneven ground, may present an increased risk.
- Multi-part memorials which depend on bonding of their parts for stability can present a risk where the joint has failed. Some memorials might also be made of material which more readily erodes and causes the memorial to become unsafe. It may therefore be appropriate to examine these memorials in advance of others. On the other hand, the risk of joint failure is absent in monolithic monuments, and memorials with a broad base are less likely to fall than those with a relatively narrow base.
- More recent memorials should be designed to British Standards 8415, and the construction, dowels and fixings should be in accordance with the National Association of Memorial Masons (NAMM)



Code of Working Practice. Memorials installed to these practices have greater assurance of good stability.

- Proper practice necessitates that the council should record all memorials. This is an essential first step to enable prioritisation of and provide a focus for the inspection and assessment process.

7.3. Training will be provided for all personnel carrying out the inspections/testing and make safe work.

8. Inspection of memorials

A visual inspection should be the next step in assessing the risk of a memorial falling. It acts as an effective early warning system to help prioritise memorials that need more detailed inspection.

Problems to look out for include:

- Damaged or eroding bonding.
- Movement of parts of a memorial from its original position.
- Kerb stones breaking apart.
- Undermined or unstable foundations.
- Leaning memorials – particularly if there is evidence of recent movement.
- Evidence of structural damage or disturbance (e.g. cracks).
- The presence of vegetation, which may cause cracks etc to widen

8.1. The profile of memorial types in the burial ground, together with the visual inspection will help determine those memorials that require a hand test, and how to prioritise those hand tests:

- Some memorials will require specialist assessment, and the location and frequency of visitors to these locations will help determine the timing of that specialist inspection. It is not normally appropriate to use a hand test to confirm stability of these memorials.
- Where memorials (that do not require a specialist assessment) have visible signs of damage or defects such as joint or component failure, a hand test should be used to determine stability of the memorial and can save on unnecessary work. The location and frequency of visitors to these memorials will help determine the timing of the hand test e.g. more frequently visited parts of the burial ground should be prioritised for an early hand test. This can often be done straight away at the time of the visual inspection.
- Where memorials (that do not require a specialist assessment) have no sign of defects, a hand test may not be necessary but can still be used to confirm that the memorial is stable. These tests should be treated as a lower priority to the hand tests of memorials that have signs of instability – though they may, of course, be undertaken at the same time as the visual inspection. The hand test of memorials in locations that are more frequently visited should be treated as a higher priority than the memorial in less frequented locations.

9. **Hand Test or Check:** In this policy the simple hand test is the primary test for all memorials (except memorials over 2.5 metres in height or complex structures). The Institute of Cemetery and Crematorium Management (ICCM) only advises the use of a force measuring device on memorials 500mm to 1.5 metres in height that PASS the simple hand test. This action is recommended so as to ensure consistency in maximum pressure applied and negate over-pressuring and subsequent accusations of causing damage.



- 9.1. How to do a hand check¹: The hand check can be carried out by standing to one side of the memorial and applying a firm but steady pressure in different directions to determine to what degree if any the headstone is loose.
- 9.2. If some instability is detected following the hand test, a judgement must be made as to whether this movement is limited, or whether there is sufficient movement for the memorial to present a high risk to people's health and safety. Operators should note that many memorials installed in recent years on independent foundations are fitted with a ground support system. These memorials may move, even rock if the base to foundation joint is broken, but do so within designed tolerance limits and represent no danger as the memorial will lock on the ground anchor.
- 9.3. Visual and hand checks can be carried out by a person with a working knowledge of memorials and their defects, and/or good knowledge of the memorials in any burial ground, but those inspecting memorials need to be mindful of, and consider, the risks to their own health and safety. Hand testing is appropriate for many memorials, such as the modern, lawn type, as well as smaller stepped designs or tiered crosses. Much larger, heavier memorials, such as older columns or obelisk types, may require an assessment by a specialist engineer or competent memorial mason.
- 9.4. Where the judgement is not so clear, the council may need to consult a specialist engineer or memorial mason for advice.
10. **28 days notice will be given for any intended action to any memorial unless it is considered an immediate danger.** If all attempts to contact the grave owner fail then the council has the right to remove or take such steps as to make safe the hazard. This will also be the case for memorials where the grave owner or their heirs-at-law have been contactable but were either unwilling or unable to ensure a repair by a registered stone mason.
11. **Deciding on precautions**
 - a) Any precautions taken must be proportionate to the risk of people suffering harm. In most cases the actual level of risk from an unstable memorial will be very low such that a warning sign near to - or in some instances on - a memorial alerting visitors to the potential danger will suffice until repair has been arranged. If the circumstances make this impractical, for example there is the potential for confusion as to which memorial any warning refers, a memorial may need to be cordoned off until it is made safe.
 - b) A memorial may be so unstable there is an imminent risk of it toppling. In a very few cases where this could result in serious injury, immediate steps may be necessary to reduce the risk e.g. restricting access or laying the memorial flat. The routine staking of memorials is not recommended – not only is there a risk of harm in the staking itself, there is also the potential for damage to the memorial, but if deemed appropriate during the inspection a memorial may be staked for up to three months.
 - c) In all cases where temporary measures have been taken to make a memorial safe, steps to effect permanent repairs should be taken as soon as possible. The council should be aware of the potential for upset and distress amongst mourners and the bereaved, as well as the potential for disfiguring the appearance of a burial ground.
 - d) Arrangements will be put in place to encourage employees, contractors, volunteers and members of the public, to report any memorials which they believe may be unstable.
 - e) If a lot of improvements are needed, an action plan will be produced. It will include, prioritisation of improvements to manage the greatest risks, as well as longer term measures



for those memorials with structural faults which may need more frequent monitoring than the rest of the burial ground.

12. Keeping records

The council will record evidence to show that:

- Proper checks were made.
- Those who might be affected were identified.
- Significant risks will be dealt with, taking account of the number of people who might be exposed, and the likelihood of the risk.
- Any precautions are reasonable, and the remaining risk is acceptable.

Records will include information that will assist in the location of memorials in future inspections, information on the visual and hand tests, an assessment of the priority and any action taken. Digital photographs will also be taken as a permanent record.

Bibliography

- Diocese of Peterborough Notes of Guidance, Churchyards: Broken and Dangerous Gravestones (December 2012) of Justice Managing the safety of Burial Ground Memorials: Practical advice for dealing with unstable memorials (2009)
- Institute of Cemetery and Crematorium Management (ICCM) Management of Memorials (May 2012)
- Parish Council Memorial Safety Policy (Adopted 20 October 2011, reviewed 7 September 2015)
Family History Group Helmsley - Monumental Inscriptions: All Saints and Cemetery (2015) - download on order

ⁱ ICCM Para 1.7 A dangerous or unstable memorial is defined as one that will move and continue to fall to the ground with the exertion of a force of 25kg or less. It should be noted that a memorial that moves under pressure does not necessarily pose a danger and should be judged against the aforementioned definition.