



MEMORIAL MANAGEMENT & SAFETY TESTING POLICY

1. Policy Statement

Diss Town Council recognises its duty to provide and maintain safe cemeteries and churchyards for visitors, staff, contractors, volunteers and members of the public, whilst respecting the dignity of the deceased, the rights of grave owners and the heritage value of memorials.

The Council adopts a proportionate, risk-based approach to memorial management that balances public safety with sensitivity towards bereaved families and historic environments.

2. Purpose

This policy aims to:

- a) Ensure memorials remain safe and do not present a risk to the public.
- b) Establish a consistent approach to memorial inspection and testing.
- c) Define the responsibilities of the Council, grave owners, memorial masons and contractors.
- d) Ensure compliance with relevant legislation and industry guidance.
- e) Maintain appropriate records and communication processes.
- f) Protect the historic and cultural significance of cemetery and churchyard memorials.

3. Scope

This policy applies to Heywood Road Cemetery, St Mary's Churchyard and all headstones, kerb sets, crosses, tablets, monuments and other memorial structures for which Diss Town Council has management responsibility.

4. Definitions

Heritage Memorial: A memorial identified by the Council as possessing historical, architectural, archaeological, artistic, cultural, religious or community significance.

Unsafe Memorial: A memorial which, through instability, deterioration or damage, presents a foreseeable risk of injury to persons or property.

5. Legislative and Regulatory Framework

This policy is informed by:

- a) Health and Safety at Work etc. Act 1974.
- b) Occupiers' Liability Acts 1957 and 1984.
- c) Local Authorities' Cemeteries Order 1977.
- d) Ministry of Justice and HSE guidance, Managing the Safety of Burial Ground Memorials: Practical Advice for Dealing with Unstable Memorials.
- e) Management of Health and Safety at Work Regulations 1999.
- f) BS 8415:2018 Memorials within Burial Grounds and Memorial Sites.
- g) ICCM Guidance: Management of Memorials 2019.
- h) Any applicable diocesan Faculty requirements within consecrated areas.

6. Roles and Responsibilities

6.1 Diss Town Council

The Council, as Burial Authority and site manager, shall:

- a) Maintain a memorial safety management programme.
- b) Undertake periodic inspections.
- c) Keep suitable inspection and maintenance records.
- d) Assess and manage identified risks.
- e) Notify grave owners where defects are found, where possible.
- f) Take reasonable action to protect public safety.
- g) Ensure inspections are undertaken by suitably trained personnel.

6.2 Grave Owners

The owner of the Exclusive Right of Burial is responsible for:

- a) Maintaining memorials in a safe condition.
- b) Arranging repairs where defects occur.
- c) Keeping the Council informed of current contact details.
- d) Meeting costs associated with memorial repairs unless responsibility lies elsewhere.

6.3 Memorial Masons and Installers

Memorial masons and installers shall:

- a) Obtain written approval from the Council before installation and arrange an appointment before undertaking work within the cemetery or churchyard.
- b) Install memorials in accordance with BS 8415, any subsequent revision and current industry standards.
- c) Provide evidence of competence, appropriate insurance, risk assessments and method statements when requested by the Council.
- d) Comply with the Council's Cemetery Regulations, Memorial Application Procedures and site safety requirements.
- e) Rectify defective workmanship where applicable.

6.4 Other Contractors

All other contractors working in the burial grounds shall comply with the Council's Cemetery Regulations and site safety requirements. They must maintain appropriate insurance and competence and provide supporting documentation when requested.

7. Memorial Approval and Unauthorised Memorials

No memorial may be erected, altered, removed or substantially modified without prior permission from the Council.

The Council reserves the right to:

- a) Require removal of unauthorised memorials.
- b) Require alterations to non-compliant memorials.
- c) Recover reasonable costs where permitted by law.

8. General Principles of Memorial Safety

The Council shall adopt a risk-based approach based on:

- a) Visual inspection as the primary inspection method.
- b) Proportionate action based on measurable risk.
- c) Respect for grave owners and visitors.
- d) Consideration of heritage and conservation requirements.
- e) Accurate record keeping.
- f) Clear communication with affected parties.

9. Inspection and Testing Programme

9.1 Frequency

Memorials over 625 mm in height will normally be inspected on a cycle not exceeding five years. Additional inspections may be undertaken following storm damage, subsidence, vandalism, ground movement, or concerns raised by visitors or staff.

9.2 Inspection Methodology

Inspections shall generally follow a staged approach.

Stage 1 - Visual inspection. Inspectors shall assess leaning, cracks or fractures, loose components, deteriorated joints, foundation failure, ground conditions, vegetation impacts and evidence of vandalism or instability.

Stage 2 - Hand assessment. Where appropriate and safe, small movements may be assessed using a controlled hand test by trained personnel. Visual assessment shall remain the primary inspection method.

10. Risk Classification

Category 1 - High Risk

Memorials presenting an immediate risk of collapse or serious injury.

- a) Immediate risk reduction.
- b) Temporary support, cordon or laying flat.
- c) Attempts to contact the grave owner.
- d) Permanent remedy arranged as soon as practicable.

Category 2 - Medium Risk

Memorials showing deterioration but not presenting immediate danger.

- a) Monitoring.
- b) Re-inspection within an appropriate period.
- c) Owner notification where possible.

Category 3 - Low Risk

Memorials stable and presenting no immediate concerns.

- Routine re-inspection during the next inspection cycle.

11. Management of Unsafe Memorials

Where a memorial is found to be unsafe, the Council may place warning notices, erect barriers or temporary fencing, install temporary supports, create an exclusion zone, lay the memorial flat where necessary, or take other reasonable action to eliminate or reduce the risk.

The action taken shall be proportionate to the level of risk and the characteristics of the memorial. Where possible, grave owners will be informed before permanent works are undertaken. Where an immediate danger exists, public safety shall take precedence.

12. Churchyard and Heritage Memorials

The Council recognises that memorials within St Mary's Churchyard, and certain memorials within Heywood Road Cemetery, may have historical, architectural, archaeological, artistic, cultural, religious or community significance. Safety management and remedial work shall be sensitive to that significance and, within consecrated areas, comply with any applicable Faculty requirements.

12.1 Identification

A memorial may be treated as a Heritage Memorial, regardless of age, where it:

- a) Is listed or forms part of a listed site, or is within a protected churchyard.
- b) Has significant age, rarity, historic interest, inscriptions, carving, craftsmanship, sculpture, design or materials.

- c) Commemorates a person, event, family, organisation or institution of significance.
- d) Makes an important contribution to the character of the cemetery or churchyard.
- e) Has been identified by the Council, Diocese, Historic England, a local history group or a conservation specialist as having heritage value.

Age alone will not determine heritage significance. Memorials over 100 years old, and those dating from before 1900, should normally receive additional consideration before significant intervention.

12.2 Inspection and Risk Management

Inspection shall prioritise detailed visual assessment, minimise physical intervention, consider condition, construction, materials and heritage significance, and record defects and risks in writing and, where appropriate, through photographs.

Where a Heritage Memorial presents a safety risk, the Council shall use the least intrusive reasonably practicable control before considering dismantling, laying flat or removal. Controls may include temporary barriers, warning notices, supports or restricted access. Where there is immediate danger, the Council may take any necessary action to eliminate or reduce the risk.

12.3 Specialist Advice and Recording

For a listed, particularly significant, structurally complex or uncertain memorial, the Council may seek advice from a conservation specialist, structural engineer, relevant diocesan or Church authority, Historic England, an appropriate heritage organisation or a local authority conservation officer.

Before significant alteration, dismantling or removal, the Council should consider photographic recording, recording significant inscriptions and features, retaining original fabric, recording decisions and works, and storing significant removed components where practical and appropriate.

The Council shall seek to preserve heritage significance wherever reasonably practicable, but public safety remains the overriding consideration where a memorial presents a significant risk of injury.

13. Record Keeping

The Council shall maintain records of:

- a) Memorial permits and approvals.
- b) Memorial ownership information.
- c) Inspection dates and findings.
- d) Risk classifications and actions taken.
- e) Photographs where appropriate.
- f) Correspondence with grave owners.

Records may be kept electronically and shall be retained in accordance with the Council's data protection and retention policies.

14. Communication

The Council will communicate memorial safety matters clearly, transparently and sensitively. Where possible, it will:

- a) Contact grave owners about safety concerns.
- b) Display notices where inspections are planned.
- c) Explain the reasons for safety action.
- d) Provide guidance on owner responsibilities and repair requirements.

15. Training

Council officers and other Council-appointed personnel undertaking memorial inspections shall receive appropriate training in memorial safety awareness, inspection techniques, risk assessment, record keeping and safe systems of work. Contractors remain responsible for maintaining and evidencing the competence required for their work, as set out in section 6.

16. Policy Review

This policy shall be reviewed every four years, following a significant incident, following changes in legislation, guidance or industry standards, or where operational experience indicates that amendment is necessary.

This policy should be read alongside the Council's Cemetery Regulations, Memorial Application Procedures and any applicable Church Faculty requirements.