



ROSSENDALE BOROUGH COUNCIL

Management of Memorial Safety Policy and Procedures

August 2025

1. Introduction

- 1.1 Rossendale Borough Council (RBC) recognises that it has a duty of care to ensure, so far as is reasonably practicable, the safety of employees, contractors and the public who work in or visit their cemeteries and closed churchyards.
- 1.2 It is recognised that memorials can deteriorate over time, and that this deterioration can adversely affect their stability, creating safety risks to both visitors to burial grounds and employees and contractors working within them.
- 1.3 Guidance for Burial Authorities advises the regular inspection and assessment of memorials as an integral part of maintaining the safety of burial grounds.
- 1.4 This policy outlines the approach to the inspection and assessment of memorials in RBC's burial grounds, and the action to be taken according to the risk each memorial presents.
- 1.5 This policy applies to all Council staff working in any of the burial grounds under RBC's control, including those who inspect memorials, or who carry out other duties, such as gravedigging and grounds maintenance.

2. Definitions

- 2.1 **Memorial** – a memorial is a permanent structure that commemorates a deceased person or a group of people. Memorials are made out of a range of materials e.g. sandstone, granite, marble and are built with varying construction methods and in a range of styles.
- 2.2 **Closed Churchyards** - closed churchyards are churchyards which are no longer used for burials, and where the responsibility for their maintenance rests with RBC. Throughout this policy, cemeteries and closed churchyards are referred to collectively as burial grounds.
- 2.3 **BS 8415** – The current British Standard for the design, erection and fixing of memorials.
- 2.4 **BRAMM** – The British Register of Accredited Memorial Masons. This is the industry's single registration scheme, designed to ensure that all masons work in compliance to British Standard BS8415 to improve safety standards within burial grounds.
- 2.5 **NAMM** – The National Association of Memorial Masons. NAMM is a trade association for memorial masons and helps set the industry standard with its Code of Business Practice & Code of Working Practice. NAMM also provides accredited training for fixing memorials and for safety inspection and assessment of memorials.
- 2.6 **RQMF** – The Register of Qualified Memorial Fixers. This is a registration scheme, administered by NAMM, for memorial fixers/installers/erectors and memorial mason businesses. All those registered are required to comply with industry standards of memorial fixing in accordance with the current NAMM Code of Working Practice and British Standard BS8415.

3. Purpose

The purpose of the policy is to outline RBC's approach to managing the safety of memorials in its burial grounds. Its aim is to safeguard, so far as is reasonably practicable, the health, safety and welfare of those who work in and visit RBC's burial grounds from foreseeable risks from the deterioration of or damage to memorials.

4. Policy

- 4.1** RBC will ensure that all memorials in burial grounds under their control are regularly inspected, by a competent memorial inspector, and that all memorials are risk assessed to determine the appropriate action.
- 4.2** Prior to conducting regular inspections, RBC will place notices informing grave owners and visitors to its burial grounds of the forthcoming inspections which are aimed at identifying and controlling any danger from unsafe memorials. These will be placed at the entrance to the burial ground, on cemetery noticeboards and at appropriate locations within each burial ground. Information will also be provided on RBC's website and may be given out on RBC's social media platforms.
- 4.3** Details of inspections carried out will be held electronically to provide a continuous and accessible record, including the current risk rating of each memorial.
- 4.4** At least one employee in each of RBC's four cemeteries will be trained in the safety inspection and assessment of memorials, and will be responsible for monitoring the general condition of memorials in the cemeteries, and for reporting any damage, suspected deterioration or accidents involving memorials to their line manager as soon as is reasonably practicable, so that a re-inspection of the memorial can be carried out at the earliest opportunity.
- 4.5** Cemeteries staff will undertake routine inspection of memorials when conditions which may affect the safety of memorials change, for example in the immediate area surrounding a newly dug grave.
- 4.6** All staff who undertake work in RBC's burial grounds will be briefed on the risks associated with memorials, relevant controls for reducing the risks during their work, and how to report any concerns.
- 4.7** Grave owners who wish to erect, fix, re-fix or add engraving to a memorial must apply to RBC for a permit before any work is undertaken. They will be required to provide satisfactory evidence that all works will meet the industry-recognised standard BS 8415. For new memorials, evidence will be required to certify that memorials and any component ground anchor and lock-down systems have been designed to meet BS 8415. All works must be carried out by a memorial mason who is registered with a body that works in compliance with BS 8415 e.g. BRAMM, NAMM. RBC will only issue a permit after receipt of satisfactory evidence. Monumental masons are required to ensure all workmanship is covered by a guarantee of conformity and a minimum six-year stability guarantee.

5. Responsibilities for memorial safety

- 5.1** As the burial authority, RBC has a duty to manage foreseeable safety risks within all burial

grounds under their control, so far as is reasonably practicable, to safeguard the health, safety and welfare of anyone who works in, or visits their burial grounds. Where memorials are identified as being unsafe RBC has a responsibility to take remedial action in proportion to the risk associated with that memorial.

- 5.2** Grave owners are responsible for maintaining the safety and stability of memorials.
- 5.3** Memorial masons are responsible for ensuring that memorials are erected safely and in accordance with BS8415. They also have responsibilities under The Consumer Rights Act 2015 to ensure that their services are provided with reasonable skill and care. They are also responsible for working in compliance with RBC's Cemetery Rules and Regulations and for reporting any concerns they have about any memorials in RBC's burial grounds to Bereavement Services.

6. Inspection Programme

- 6.1** In order to strengthen the approach to a rolling programme of regular inspections, from August 2025, a revised inspection programme will be implemented, adopting the following approach:
 - 6.1.1** Commencing at Rawtenstall Cemetery, and in advance of the inspections by RBC's competent memorial inspectors, a BRAMM-Accredited Memorial Mason will test each memorial in each burial ground to identify those which present the highest risk to employee or public safety. These tests will be carried out across the remaining three cemeteries and then the nine closed churchyards maintained by RBC.
 - 6.1.2** RBC's competent memorial inspectors will then begin inspecting every memorial, beginning with those identified as presenting the highest risk and progressing through every memorial at Rawtenstall Cemetery.
 - 6.1.3** Inspections of all memorials identified as presenting the highest risk across all remaining cemeteries will be carried out, followed by the remaining highest risk memorials in the nine closed churchyards.
 - 6.1.4** When inspections of the highest risk memorials have been completed, all remaining memorials in the cemeteries and closed churchyards will be inspected.
 - 6.1.5** At the end of this inspection programme, all memorials in RBC's burial grounds will have been inspected and given a risk category, which will determine the action to be taken as a result and the frequency of further inspections.
 - 6.1.6** Every memorial will be inspected at least once in a 5-year period, with those deemed as higher risk being inspected more frequently. Intervals for reinspection in such cases will be determined by the risk assessment of each memorial.
- 6.2** Inspections will be carried out by two people, at least one of whom will be a trained employee who has been independently assessed as competent to carry out safety inspection and assessment of memorials.
- 6.3** Records of each memorial inspection will be made, to include photographs and measurements of the memorial and details of the inspection and any testing carried out. Records will be made using 'Safe Memorials' software and held electronically.
- 6.4** Each memorial will be allocated to one of three categories, according to the risk to safety it presents. The risk category will determine the action to be taken for each memorial.

7. Inspection Process

- 7.1** Inspection of memorials is carried out in teams of two people, with at least one of these people holding the Safety Inspection and Assessment of Memorials (SIAM) City & Guilds Assured Certificate. Where inspection of a memorial is outside the capability of the RBC's competent Memorial Inspectors, or testing requires access equipment, a specialist structural engineer or a monumental mason may be engaged to carry out the inspection.
- 7.2** A full visual inspection is carried out first to determine or confirm existing details of the memorial, and to detect any defects. Details of the memorial type, height category, angle of lean, material and where possible the date of the last interment are recorded digitally, and a photograph is taken.
- 7.3** After the visual inspection, the stability of the memorial is determined through a hand-push test to check whether the memorial is loose on its foundation or at any joint. If instability is detected following the hand test, a judgment is made as to whether this movement is limited, or whether there is sufficient movement for the memorial to present a health and safety risk. The age of the memorial, ground conditions and local knowledge such as proximity to well-used areas, will also be used by inspectors in determining the level of risk.
- 7.4** Ministry of Justice guidance and BS 8415 state that the routine use of mechanical test instruments as inspection tools is not recommended and therefore RBC does not use them.
- 7.5** As a result of the inspection and assessment, the inspector will allocate each memorial into one of three categories, according to the level of risk it presents:

Green	Stable and secure, presents no apparent danger of falling
Amber	Some instability, but presents a low health and safety risk.
Red	Unstable and requires immediate attention

The risk category will determine the action required as a result of the risk assessment.

- 7.6** Larger, heavier, taller memorials, such as columns or obelisks, or listed monuments, may require detailed assessment by a specialist structural engineer or memorial mason.
- 7.7** War graves will be inspected and tested. However, if any defects are detected, they will be reported immediately to the War Graves Commission to repair. Any war graves assessed as being in the red risk category will be made safe pending repair.
- 7.8** Listed memorials will be inspected and tested. If any need dismantling or repairing then permission will be sought from RBC's Planning Dept. They will be made temporarily safe in the appropriate manner until the permission is granted.

8. Action following inspection

Action will be prioritised according to risk category, with red category risks actioned first.

8.1 Green risk category

Most memorials categorized as green risk level will be re-inspected as part of the five-year rolling programme.

The exception are 'Priority' Green memorials. These are memorials that are deemed safe upon inspection, but, due to a combination of risk factors like age, size, location, footfall, construction materials, ground conditions, there is a concern that they could become unsafe sooner than 5 years, and therefore require a more frequent inspection regime. These Priority Green memorials will be inspected either every 12 months or 36

months, with the interval determined by the inspector.

8.2 Amber risk category

The following action will be taken without delay:

- A wooden stake with a written notice will be placed in suitable position near the memorial to warn of the unstable condition of the memorial.
- Where the last interment was within 30 years and grave owner or next of kin is identified:
 - If the memorial is a lawn type, it will be made safe with a temporary support and banding to secure the memorial until the next scheduled inspection date, which will be conducted within 10 working days of the 3 months allowed for the grave owner to repair.
 - A letter will be sent to the grave owner within ten working days of the inspection requesting memorial repair within three months;
 - If the memorial is a larger type memorial, it will be made permanently safe as soon as practicably possible after the inspection, by the most cost-effective means.
 - Where possible, the headstone will be laid down flat at the point of inspection or on the same day;
 - A letter will be sent to the grave owner explaining the action taken and outlining the option to refix.
- Where the last interment was over 30 years ago:
 - the memorial will be made permanently safe as soon as practicably possible after the inspection, by the most cost-effective means.
 - Where possible, the headstone will be laid down flat at the point of inspection or on the same day.
 - Cemeteries staff will bury the memorial by one third in the ground at a later date when inspections for that cemetery are completed.
- Where the grave owner has been written to regarding the repair of an Amber memorial, and no contact has been made with RBC within the 3 month period:
 - The memorial will be made permanently safe by the most cost-effective manner, which is usually lay the headstone flat on the ground or bury one third in the ground.
 - The costs of remedial work will be recharged to the owner, where known, together with an administration charge of 30% of the cost of the work.
 - If the memorial is less than six years old and the mason that installed the memorial is known, RBC will notify them in order to arrange re-fixing to NAMM Code of Working Practice and current BS8415 standards.
- Where an Amber category memorial is repaired by a monumental mason, a further inspection by one of RBC's competent inspectors will be carried out as part of the standard 5 year cycle, and the current risk category recorded.

8.3 Red risk category

Where memorials are categorised as red, the following action will be taken without delay:

- Action to make the memorial permanently safe will be taken as soon as practicable, by the most cost-effective means. This usually involves lying the memorial down immediately.
- If the memorial cannot be laid down immediately, it will be cordoned off with accompanying hazard warnings displayed.
Cordoned off areas will cover a fall area of at least 1.5 times the memorial height.
- A notice will be placed in a suitable position at the grave to warn of the immediate danger posed by the memorial.
-
- Checks will be made regularly, with photographs of the cordoned area be taken, until the memorial can be made permanently safe.
- Where the grave owner or a person with an interest in a memorial is known, and the last interment is within 30 years :
 - a letter will be sent within ten working days of the inspection to notify them of the action taken;
 - if works have been undertaken by RBC to make the memorial safe, attempts will be made to recover the costs from the owner, together with an administration charge of 30% of the cost of the work.
- Where a Red category memorial is repaired by a monumental mason, a further inspection by one of RBC's competent inspectors will be carried out as part of the standard 5-year cycle, and the risk category recorded.

9. Ongoing monitoring and reporting

- 9.1** Each of Rossendale's four cemeteries have at least one member of staff present and working there for approximately 80% of the working week. These employees have been trained in the safety inspection and assessment of memorials and have been assessed as competent. This has given them the skills to identify obvious defects or areas of concern when carrying out their duties.
- 9.2** If in the course of their duties they identify an obvious defect or area of concern the area will be taped off and the defect or concern will be immediately reported to a line manager so that a full inspection and test can be arranged and carried out as soon as is reasonably practicable, but within 3 working days.
- 9.3** After burials have taken place, it is possible that surrounding ground can be disturbed by the excavation process. Burial staff therefore will test all memorials immediately surrounding the newly dug grave for any movement straight after the backfill and record findings. The same memorials will then be tested again after 6 months to ensure they are secure and have not been affected by any movement of the land. These inspections will be recorded and any relevant action will be taken according to the memorial's assessed risk category.
- 9.4** Monitoring of this policy and of progress on the memorial inspection programme will take place via the Operations' Health and Safety Committee

10. Review

10.1 This policy and these procedures will be reviewed every five years or sooner if any new information on hazards or changes in best practice become available.