



NORTH WALSHAM TOWN COUNCIL

Memorial Safety Testing Policy

Adopted by the Council at its meeting held on 28.07.2026

Summary:

This policy sets out the procedure for inspecting and testing memorials to ensure they remain in a safe and stable condition, in accordance with relevant safety guidance, the British Standard for memorials, and industry best practice.

The issue of memorial safety was brought about publicly following cases where memorials have toppled over and caused injuries, sometimes fatal, to members of the public. In particular, the death of a child in Yorkshire in 2000 highlighted the problem of unstable memorials. In July 2025 a four year old boy died after a gravestone fell on him at a local authority cemetery in Rawtenstall, Lancashire.

Locations:

This policy relates to the following locations:

The Chapel Cemetery – Mundesley Road, North Walsham

The North/South Cemetery and Garden of Remembrance – Bacton Road, North Walsham

St Nicholas Churchyard – Market Place, North Walsham

Responsibilities and Liability:

1.1 North Walsham Town Council has responsibility for the overall safety within a burial ground under the Health and Safety at Work Act 1974 and the Occupiers Liability Act 1957 to ensure that, as far as reasonably practicable, their sites are maintained in a safe condition.

1.2 In order to comply with the Health and Safety at Work Act 1974 and subsequent regulations, North Walsham Town Council intends to embark on a systematic programme of memorial safety inspections ensuring that any memorials that pose a safety risk are made safe.

1.3 The strategic aim of this policy is to ensure that all open and closed cemeteries which are under the responsibility of North Walsham Town Council, are safe places for staff, visitors and all others who may visit or work in the cemeteries.

1.4 Whilst North Walsham Town Council has overall responsibility for the safety of the cemetery, including risks from unstable memorials, it does not own the memorials. The owner of the memorial will be the grave owner/owner of the Exclusive Rights.

1.5 The owners of memorials are responsible for maintaining the memorial in a good condition. In some cases, there is however no identifiable owner.

1.6 Memorial Stonemasons must now ensure memorials are erected safely and in accordance with current standards available within the industry – British Standard 8415, the National Association of Memorial Masons (NAMM) code of working practice and the British Register of Accredited Memorial Masons (BRAMM) Blue Book.

1.7 All memorial safety testing will be carried out in accordance with the relevant risk assessments by trained Council staff.

1.8 This policy has been adopted by North Walsham Town Council, and therefore any appropriate officers/operatives of the Council are to carry out the instructions of the Council, as per this policy.

1.9 All letters will be signed from the Town Clerk as the Proper Officer of the Council.

Procedure

2.1 Initial Visual Inspection

1. Conduct a preliminary visual assessment of the memorial.
2. Record and evaluate the following:
 - General condition of the memorial.
 - Condition of all joints and fixings.
 - Evidence of damage, deterioration, or loose components.
 - Signs of foundation erosion or ground subsidence.

2.2 Stability Assessment

1. If no immediate hazards are identified during the visual inspection, perform a physical stability test by hand.
2. Apply a measured and controlled hand force to the top centre of the memorial to assess stability, in accordance with recognised industry practice.

3. Determine whether the memorial remains secure and resistant to movement.
4. Classify the memorial as:
 - Pass – Stable and not at risk of collapse.
 - Fail – Unstable, poses a safety risk, or likely to fall without resistance.
 - Partial Pass – Stable but there is still an issue.

2.3 Notification of Failure

For any memorial classified as Fail:

- The Council will contact the registered grave owner at their last known address, as recorded in Cemetery records.
- A written notification (Letter 1 – Annex C) will be issued, requesting that the memorial be repaired within six (6) months.
- The letter will specify that repairs must comply with the relevant British Standard.
- A warning notice will be placed on the memorial; this identifies the memorial as failing a memorial test and being in an unsafe condition.
- Any memorial that is identified as being at risk of imminent failure may be made safe prior to attempts being made to contact the grave owner. (Cemetery Rules & Regulations refer to making memorials safe [stake and strap] and/or laying them down [last resort] without prior notice.)

2.4 For any memorial classified as Partial Pass:

For any memorial classified as Partial Pass:

- The Council will contact the registered grave owner at their last known address, as recorded in Cemetery records.
- A written notification (Letter 4 – Annex F) will be issued, detailing any issues and suggesting any remedial work as necessary.
- The letter will specify that any repairs must comply with the relevant British Standard.
- The memorial will be retested in twelve (12) months.
- To ensure consistency and accuracy in the inspection process, a calibrated pressure testing tool will be used alongside the hand test method where appropriate. The results will be recorded to provide an objective and auditable record of the inspection, helping to minimise discrepancies or errors and ensure that memorials are assessed against the same standard.

2.5 Retesting and Further Action

1. The Council will retest all failed memorials six (6) months after, and all partially passed memorials after twelve (12) months issuing failure notifications.
2. If a memorial remains in a failed condition at the retest:
 - Details will be recorded regarding the failure to repair.
 - A written notification (Letter 2 – Annex D) will be issued if retesting a failed memorial, or (Letter 1 – Annex C) if a Partial Pass now fails.
 - Council staff will lay down, secure, or otherwise make the memorial safe as soon as possible.
3. If a memorial remains in a partially passed condition at the retest:
 - The memorial will be rested in twelve (12) months.

2.6 Record Keeping

All inspections, test results, notifications, and remedial actions will be documented and retained as per our retention policy.

3. Training

Only appropriately trained staff will carry out all memorial inspections. This training is delivered and accredited by the Institute of Cemetery and Crematorium Management (ICCM).

4. References:

North Walsham Town Council has produced this policy in line with guidance from the ICCM report “Management of Memorials” August 2019, The Local Government Ombudsman’s special report “Memorial Safety in Local Authority Cemeteries” 2006 and the Ministry of Justice “Managing the Safety of Burial Grounds Memorial” 2009.

5. List of Annexes:

Annex A – Memorial Inspection Form Details

Annex B – Memorial Assessment Details

Annex C – Letter 1 (Failure Letter Action Required)

Annex D – Letter 2 (Failure Letter Final Reminder Before Further Action)

Annex E – Letter 3 (Failure Letter Notice of Action Taken)

Annex F – Letter 4 (Partial Pass Letter Action Suggested)

Memorial Inspection Form Details:

The following details will be recorded per memorial tested.

Inspection details:

Inspection Method – Hand testing / Device

Test Details:

Cemetery Name

Plot Number

Name/s on memorial

Type/material – Headstone etc

Visual Condition - lean angle, stability, decay, movement

Stability Test (pass/fail/partial pass) give details if not passed

Risk Factor Overall – High / Med / Low

Action required

Details of any photographs

Timescale for reinspection

Any notes

Inspector Details:

Date

Inspector Name

Memorial Assessment Details:

Each memorial will be assessed as follows:

	Visual Checks	Manual Check
Low Risk (Pass)	• No cracks • Memorial upright and without any significant leaning	• No movement detectable or movement is within built tolerances
Medium Risk (Partial Pass)	• Some cracks visible	• Some movement possible if force applied
High Risk (Fail)	• Large visible cracks • Obvious lean • Ground around memorial disturbed • Pieces of the memorial missing or in wrong place (i.e. on the floor)	• Moved easily with minimal pressure

Actions Following Assessment

	ACTIONS Required
Low Risk	• Re-inspect in 5 years
Medium Risk	• Officers to inform owner that repairs are recommend • Re-inspect in 12 months
High Risk	• Report immediately to Town Clerk • Council staff to take any initial actions to make it safe • Officers to inform owner to make repairs • Re-inspect in 6 months

Annex C - Letter 1 – Failed Memorial Safety Test

Dear,

Re: Memorial Safety Inspection Fail – Action Required

Deceased:The Late

Cemetery:

Section/Plot:

As part of North Walsham Town Council's ongoing responsibility to help keep our cemeteries safe for everyone who visits them, we are carrying out a programme of memorial safety inspections.

The inspection programme has been carried out as an open process, with notices displayed within the cemetery and in various forms of media before inspections began. The inspections are being undertaken by Council staff who have received memorial safety inspection training through the Institute of Cemetery and Crematorium Management (ICCM), in accordance with the Council's Memorial Safety Testing Policy and the decision of Full Council Meeting 28.07.2026.

Your memorial was respectfully inspected on [Date] by a trained Council staff member.

During the inspection, it was found that the memorial was unstable and requires attention to ensure it is safe.

As a precaution, the Council has taken temporary measures by placing a small notice and staking/strapping to support the memorial, which reduces any immediate risk to visitors. This is a temporary safety measure only and is not a permanent repair.

Under the Council's Cemetery Rules and Regulations, responsibility for maintaining a memorial rests with the registered owner of the Exclusive Right of Burial.

We kindly ask that you arrange for the memorial to be permanently repaired within six months of the date of this letter. Repairs should be carried out by a suitably qualified memorial mason and must comply with current industry standards, including:

BS 8415 – Code of Practice for Memorials within Burial Grounds.

The National Association of Memorial Masons (NAMM) Code of Working Practice.

The British Register of Accredited Memorial Masons (BRAMM) Blue Book.

Once the repair has been completed, please let us know so that we can re-inspect the memorial, remove the temporary safety measures as appropriate and update our records.

If repairs are not completed within six months, the Council may need to consider taking further action to ensure the memorial remains safe for visitors and staff. The Council's intention is to provide sufficient time for the necessary repairs to be arranged before any further action is considered. We appreciate your assistance in arranging the necessary work.

If you believe our records are incorrect, or if you have any questions about this letter or the inspection, please do not hesitate to contact the Town Council Office. We will be happy to help.

Thank you for your understanding and cooperation in helping us maintain a safe and respectful cemetery for all.

Yours sincerely

Annex D - Letter 2 – Failed Memorial Safety Test Reminder

Dear,

Re: Memorial Safety Inspection Fail – Final Reminder Before Further Action

Deceased:The Late

Cemetery:

Section/Plot:

We are writing further to our previous letter dated [Date of First Letter] regarding the memorial on the above grave.

As explained in our earlier correspondence, the memorial was inspected on [Inspection Date] and was found to be unstable. Temporary safety measures were put in place to reduce the risk to visitors, staff and contractors while permanent repairs are arranged.

To date, we have not received confirmation that repairs have been carried out or are being arranged.

The Council has a legal duty to manage health and safety within its cemeteries and, while we fully appreciate the personal significance of memorials, we must also ensure that they do not present a risk of injury. Even a small amount of movement in a memorial can increase over time and may result in it becoming unsafe.

We would therefore respectfully ask that you arrange for the memorial to be permanently repaired by a suitably qualified memorial mason within the next three months. As advised previously, any repair work should comply with current industry standards, including:

BS 8415 – Code of Practice for Memorials within Burial Grounds.

The National Association of Memorial Masons (NAMM) Code of Working Practice.

The British Register of Accredited Memorial Masons (BRAMM) Blue Book.

Once the work has been completed, please contact the Town Council so that we can re-inspect the memorial, update our records and where appropriate, remove the temporary safety measures.

We sincerely hope this matter can be resolved without the need for any further action. However, if we do not hear from you within three months of the date of this letter, the Council will take further action in the interests of public safety.

This action is likely to involve laying the memorial flat to remove the risk it presents. We appreciate that this can be upsetting for families and would like to reassure you that this is considered only as a last resort, after every reasonable opportunity has been given for the memorial owner to arrange the necessary repairs.

If you are experiencing difficulties in arranging the work, or if you believe our records are incorrect, please contact the Town Council Office as soon as possible. We are happy to discuss the matter with you.

Thank you for your understanding and cooperation in helping us maintain a safe and respectful environment for everyone visiting the cemetery.

Yours sincerely,

Annex E - Letter 3 – Failed Memorial Safety Test Notice of Action Taken

Dear,

Re: Memorial Safety Inspection Fail – Memorial Laid Down for Public Safety

Deceased:The Late

Cemetery:

Section/Plot:

We are writing to inform you that North Walsham Town Council has now laid the memorial on the above grave flat for safety reasons.

This action follows our previous correspondence dated [Date of First Letter] and [Date of Reminder Letter], sent to your registered address, advising that the memorial had failed a safety inspection and requesting that repairs be arranged. Despite our attempts to contact you over the past nine months, we have not received a response.

The Council has a legal duty to ensure that its cemeteries remain safe for all visitors, staff and contractors. Whilst we fully recognise the importance and significance of memorials to families and loved ones, we also have a responsibility to reduce the risk of injury where a memorial has been identified as unstable.

Laying a memorial flat is always a last resort and is only undertaken after reasonable efforts have been made to contact the registered owner and sufficient time has been allowed for repairs to be arranged.

The memorial remains your responsibility as the registered owner of the Exclusive Right of Burial. If you wish to have the memorial reinstated in the future, you will need to arrange for a suitably qualified memorial mason to carry out the necessary work in accordance with current industry standards, including:

BS 8415 – Code of Practice for Memorials within Burial Grounds.

The National Association of Memorial Masons (NAMM) Code of Working Practice.

The British Register of Accredited Memorial Masons (BRAMM) Blue Book.

Once repairs have been completed, please contact the Town Council so that arrangements can be made to re-inspect the memorial after its final reinstatement.

If your contact details have changed, or if you believe our records are incorrect, we would be grateful if you could let us know so that our records can be updated.

Should you wish to discuss this matter or arrange for the memorial to be repaired and reinstated, please contact the Town Council Office. We will be pleased to assist you.

Thank you for your understanding and cooperation.

Yours sincerely,

Annex F - Letter 4 – Memorial Safety Testing Partial Pass

Dear,

Re: Memorial Safety Inspection Partial Pass – Action Suggested

Deceased:The Late

Cemetery:

Section/Plot:

As part of North Walsham Town Council's ongoing programme of memorial safety inspections, your memorial was inspected on [Inspection Date] by a trained Council staff member.

The inspection programme is undertaken as part of the Council's legal duty to help ensure that its cemeteries remain safe for visitors, staff and contractors. Inspections are carried out by officers who have received memorial safety inspection training through the Institute of Cemetery and Crematorium Management (ICCM), in accordance with the Council's Memorial Safety Inspection Policy and the decision of Full Council Meeting 28.07.2026.

We are pleased to advise that your memorial passed the safety inspection, and no immediate action is required.

As part of the inspection process, Council staff use a measured pressure testing tool alongside the hand test method to help provide a consistent and objective assessment of memorial stability. The results are recorded as part of the inspection record, helping to ensure that memorials are assessed accurately and consistently throughout the inspection programme.

However, during the inspection, Council staff noted the following condition(s), which may require attention in the future:

Inspection observations:

[Insert observations, e.g. slight movement detected, weathering to joints, minor cracking, leaning within tolerance, deterioration of mortar, signs of settlement, etc.]

Although these issues do not currently present a level of movement or instability that requires immediate safety action, they may deteriorate over time if left unattended and before the usual scheduled retest in 5 years.

As the registered owner of the Exclusive Right of Burial, you are responsible for maintaining the memorial in a safe condition under the Council's Cemetery Rules and Regulations. We therefore recommend that you consider arranging for the memorial to

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be inspected by a suitably qualified memorial mason and that any necessary remedial work is carried out before the condition worsens.

Any repairs should comply with current industry standards, including:

BS 8415 – Code of Practice for Memorials within Burial Grounds.

The National Association of Memorial Masons (NAMM) Code of Working Practice.

The British Register of Accredited Memorial Masons (BRAMM) Blue Book.

As part of the Council's ongoing inspection programme, this memorial will be re-inspected in approximately 12 months to monitor its condition. If the memorial remains stable, no further action will be required. However, if its condition has deteriorated and it no longer meets the required safety standard, further action may be necessary to ensure public safety.

If you have any questions regarding the inspection or would like to discuss the observations recorded, please do not hesitate to contact the Town Council Office.

Thank you for your cooperation in helping us maintain a safe and respectful cemetery for all visitors.

Yours sincerely,